



Wyoming Adult Education SEA: Wyoming Community College Commission

Policy #032020: Scoring Adult Education Grants

Part I: Introduction

Section 232 of the Workforce Innovation and Opportunity Act (WIOA-Title II) and 34 CFR §463.22 requires that eligible providers desiring a grant or contract from an eligible agency shall submit an application to the eligible agency containing such information and assurances as the eligible agency may require, including:

- (1) A description of how funds awarded under this title will be spent consistent with the requirements of this title
- (2) A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities
- (3) A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under Title I, as appropriate
- (4) A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators
- (5) A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate
- (6) A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
- (7) Information that addresses the considerations described under section 231(e), as applicable.

In Wyoming, the Wyoming Community College Commission (WCCC), is the eligible agency or State Educational Agency (SEA) for which all Adult Education grants must be submitted to. Every three to five years, the WCCC releases a competitive grant competition to eligible providers in the State who wish to offer adult education services.

Part II: Reviewing the Application

Adult Education grant applications received by the WCCC are distributed to two distinct teams of readers: A compliance team and an alignment team. Each team reads grant applications for different purposes.

Prior to the commencement of any readings and/or reader trainings, all selected readers are required to sign a *Conflict of Interest* form, certifying that they have no affiliation with or involvement in any organization or entity who has submitted an Adult Education grant application, with any financial interest (such as honoraria; educational grants; participation in speakers' bureaus; membership, employment, consultancies, stock ownership, or other equity

interest; or grant writing expertise), or non-financial interest (such as personal or professional relationships, affiliations, knowledge or beliefs) in the subject matter or bidding on the State of Wyoming Adult Education grant opportunities.

The Alignment Team

According to statute, (section 107(d)(11)(B)(i)(I) of WIOA and 34 CFR § 463.21(b)(1)), the WCCC is required to submit applications to the Local Board to review for alignment with the local plan. Because Wyoming is a single area state, the Alignment Team members must come from the Wyoming Workforce Development Council, which operates as the Local Board for Wyoming. Three members from the Wyoming Workforce Development Council are selected by the Council to act as readers on the Alignment Team.

Statute requirements further mandate that this team of readers review the applications submitted to the WCCC to provide Adult Education and Literacy activities under Title II for the local area, which in Wyoming refers to the State of Wyoming and its 7 regional service areas, to determine whether such applications are consistent with the local plan (i.e. the State Plan) AND to make recommendations to the WCCC to promote alignment with such plan. The Wyoming Community College Commission must consider the results of this review team by the Local Board in determining the extent to which the application address the required considerations AND to promote alignment with the approved local plan, which is identified as the Unified State Plan.

Reader's identities are kept confidential and their comments may be shared with successful applicants, if requested. Prior to each grant competition, the WCCC will identify questions which the Alignment Team will review for alignment to the Unified State Plan and any other State identified initiatives.

A scoring rubrics is to be included in the RFP and readers will utilize this rubrics to score application into these categories:

Fail or Needs Improvement:

Application shows minimal alignment to the State Plan and/or to any Statewide initiatives outlined in an RFP.

The State will consider 'Fail or Needs Improvement' applications as '*Probationary*', high risk applications which are subject to 2 CFR§200.207 Specific Conditions. This statute authorizes the Wyoming Community College Commission, as the pass-through entity, to impose additional specific award conditions as outlined below.

- (a) The Federal awarding agency or pass-through entity may impose additional specific award conditions as needed, in accordance with paragraphs (b) and (c) of this section, under the following circumstances:
 - (1) Based on the criteria set forth in §200.205 Federal awarding agency review of risk posed by applicants;
 - (2) When an applicant or recipient has a history of failure to comply with the general or specific terms and conditions of a Federal award;

- (3) When an applicant or recipient fails to meet expected performance goals as described in §200.210 Information contained in a Federal award; or
- (4) When an applicant or recipient is not otherwise responsible.
- (b) These additional Federal award conditions may include items such as the following:
 - (1) Requiring payments as reimbursements rather than advance payments;
 - (2) Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance;
 - (3) Requiring additional, more detailed financial reports;
 - (4) Requiring additional project monitoring;
 - (5) Requiring the non-Federal entity to obtain technical or management assistance; or
 - (6) Establishing additional prior approvals.
- (c) The Federal awarding agency or pass-through entity must notify the applicant or non-Federal entity as to:
 - (1) The nature of the additional requirements;
 - (2) The reason why the additional requirements are being imposed;
 - (3) The nature of the action needed to remove the additional requirement if applicable;;
 - (4) The time allowed for completing the actions if applicable, and
 - (5) The method for requesting reconsideration of the additional requirements imposed.
- (d) Any specific conditions must be promptly removed once the conditions that prompted them have been corrected.

Applicants agreeing to the 'Specific Conditions' outlined by the Wyoming Community College Commission, will hold a '*probationary*' status for at least one year. In the event that the specific award conditions are not met after a one year probationary period, the grant award will be nullified and the area will be **re-competed**.

Applicants not agreeing to the 'Specific Conditions' outlined by the Wyoming Community College Commission, will result in either:

- (a) A **re-competition** of the grant for the area OR
- (b) The Wyoming Community College Commission awarding additional grant funds to another approved local provider to offer Adult Education services in the area.

Reader comments will be shared with applicant, if so requested.

Pass & High Pass:

Application satisfactorily meets or exceeds expectations and demonstrates alignment to the State plan and to any Statewide initiatives outlined in an RFP.

Reader comments will be shared with applicant, if so requested.

Compliance Team

Reader selection for the Compliance Team will be conducted by the WCCC and will consist of one individual from each of the following:

- (1) Fiscal person for the Adult Education grants at the SEA
- (2) An Adult Education professional
- (3) A Workforce Specialist from Wyoming
- (4) A professional grant reader/writer

The Compliance Team reviews submitted applications for compliance to the RFP application, to WIOA requirements, and for completeness and the inclusion of all requested forms and budgets. The scoring rubrics used by the compliance team is to be included in the RFP and readers will utilize the rubrics as outlined in the RFP.

The criteria used to score applications is based upon the 13 Considerations for Funding WIOA eligible local providers. WIOA §231 (e). RFP questions outlined under each consideration are weighted differently, but the entire Adult Education application will total 200 points. There are additional questions and points associated with a Corrections and/or an IELCE grant application. Scoring these types of applications is also conducted using a rubrics. In addition to scoring each question, readers are encouraged to make comments throughout the application. Successful applications will have these comments shared with applicants, if requested. Applicants for the Corrections and/or IELCE grants who fail to answer the 13 considerations in context and/or the additional questions, will not have their applications forwarded to readers.

Scores are reviewed and ranked by the Wyoming Community College Commission and reviews from both teams support funding decisions

Compliance Team Scoring Protocols

- 0%-30%** The area will be **re-competed** if the :
- (1) Compliance team scores an application at the 30th percentile or below AND
 - (2) Alignment team indicates that an application shows little or no alignment to the Local Plan and/or Statewide initiatives as indicated by 'failing' scores.
- 40%-59%** Applications scored within this category may be successful, but will be considered '*Probationary*', high risk and subject to 2 CFR§200.207 Specific Conditions. This statute authorizes the Wyoming Community College Commission, as the pass-through entity, to impose additional specific award conditions as outlined below.
- (a) The Federal awarding agency or pass-through entity may impose additional specific award conditions as needed, in accordance with paragraphs (b) and (c) of this section, under the following circumstances:
- (1) Based on the criteria set forth in §200.205 Federal awarding agency review of risk posed by applicants;
 - (2) When an applicant or recipient has a history of failure to comply with the general or specific terms and conditions of a Federal award;
 - (3) When an applicant or recipient fails to meet expected performance goals as described in §200.210 Information contained in a Federal award; or
 - (4) When an applicant or recipient is not otherwise responsible.

- (b) These additional Federal award conditions may include items such as the following:
 - (1) Requiring payments as reimbursements rather than advance payments;
 - (2) Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance;
 - (3) Requiring additional, more detailed financial reports;
 - (4) Requiring additional project monitoring;
 - (5) Requiring the non-Federal entity to obtain technical or management assistance; or
 - (6) Establishing additional prior approvals.
- (c) The Federal awarding agency or pass-through entity must notify the applicant or non-Federal entity as to:
 - (1) The nature of the additional requirements;
 - (2) The reason why the additional requirements are being imposed;
 - (3) The nature of the action needed to remove the additional requirement if applicable;;
 - (4) The time allowed for completing the actions if applicable, and
 - (5) The method for requesting reconsideration of the additional requirements imposed.
- (d) Any specific conditions must be promptly removed once the conditions that prompted them have been corrected.

Applicants agreeing to the 'Specific Conditions' outlined by the Wyoming Community College Commission, will hold a '*probationary*' status for at least one year. In the event that the specific award conditions are not met after a one year probationary period, the grant award will be nullified and the area will be **re-competed**.

Applicants not agreeing to the 'Specific Conditions' outlined by the Wyoming Community College Commission, will result in either:

- (b) A **re-competition** of the grant for the area OR
- (c) The Wyoming Community College Commission awarding additional grant funds to another approved local provider to offer Adult Education services in the area.

Reader comments will be shared with applicant, if so requested.

60% and higher:

Application was successful and will have no conditions placed upon it.

Reader comments will be shared with applicant, if so requested.