

TEXAS WORKFORCE COMMISSION
Adult Education and Literacy Letter

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To: Adult Education and Literacy Grant Recipients
Adult Education and Literacy Special Project Grantees
Local Workforce Development Board Executive Directors
Commission Executive Offices
Integrated Service Area Managers

From: 
Courtney Arbour, Director, Workforce Development Division

Subject: **Educational Outcomes for Adult Education and Literacy—*Update***

PURPOSE:

To provide Adult Education and Literacy (AEL) grantees¹ with information and guidance on the performance requirements for educational outcomes under the Workforce Innovation and Opportunity Act (WIOA), including requirements related to Measurable Skill Gains (MSGs)², Credential Attainment, and Post-Exit Educational Enrollment.

This updated AEL Letter:

- revises guidance related to Coenrollment;
- defines or revises terms related to performance accountability under WIOA;
- identifies the allowable MSG options for Basic Education and Workforce Training, when they are part of an Integrated Education and Training (IET) program, that are applicable for Program Year 2018–2019 (PY’18–’19); and
- clarifies requirements for measuring IET programs to ensure documentation of Basic Education and Workforce Training competencies.

RECISSIONS:

AEL Letter 01-18

¹ For the purposes of this AEL Letter, AEL grantees are entities that are Texas Workforce Commission (TWC) grantees funded with AEL funds.

² Capitalization represents terms that have specific definitions outlined in this AEL Letter or in other AEL Letters, guides, state or federal laws, or other publications cross-referenced in this AEL Letter.

BACKGROUND:

WIOA §116 establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of the six core WIOA programs³ in achieving positive workforce and educational results for program participants. WIOA supports the alignment of performance-related definitions and indicators, thereby facilitating comparable data collection and integrated reporting across the programs and program-specific requirements.

Requirements related to the implementation and operation of the performance accountability system are described in WIOA §116, including implementing joint regulations in 20 CFR Part 677 (reprinted in 34 CFR Parts 361 and 463). The WIOA common reporting specifications were initially developed by the US Department of Labor (DOL) and the US Department of Education (ED), approved by the US Office of Management and Budget in June 2016, and modified in March 2018.

ED's Office of Career, Technical, and Adult Education (OCTAE) Program Memorandum 17-2, revised on August 23, 2017, and entitled, "Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs," provides sub-regulatory guidance on the performance accountability requirements for WIOA Title II, also known as the Adult Education and Family Literacy Act (AEFLA). The guidance provided in Program Memorandum 17-2 corresponds to the guidance provided in DOL Training and Employment Guidance Letter 10-16, Change 1, which has the same title as the OCTAE memorandum; the only difference is that the unique cover letters written by ED and DOL affect the pagination.⁴

ED's *NRS Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act* (NRS Guide) provides additional guidance on AEL performance accountability and augments the joint federal guidance. Each year, as required by ED, TWC uses the NRS Guide and related federal and state guidance to update the TWC *AEL Assessment Guide* (Assessment Guide), which must be approved by ED. In the interim, TWC has published this AEL Letter to provide more immediate guidance. This AEL Letter is updated with revised guidance for implementation beginning July 1, 2018. Guidance in this AEL Letter is being incorporated into the PY'18-'19 Assessment Guide, which will include more detailed technical assistance on implementing the educational outcome measures described in this AEL Letter.

³ The six core programs are the Adult, Dislocated Worker, and Youth programs, authorized under WIOA Title I and administered by DOL; the AEFLA-funded program, authorized under WIOA Title II and administered by ED; the Employment Service program, authorized under the Wagner-Peyser Act, as amended by WIOA Title III and administered by DOL; and the Vocational Rehabilitation program, authorized under Title I of the Rehabilitation Act of 1973, as amended by WIOA Title IV and administered by ED.

⁴ This AEL Letter references only OCTAE Program Memorandum 17-2, Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs, revised August 23, 2017.

Expanded Options for AEL Staff to Consider

WIOA greatly expands performance options to match allowable AEL activities. MSG and Credential Attainment options support targeted measurement of college readiness and transition, Postsecondary Education or Training, and customized employer-based services. Instructors and performance accountability leads are required to clearly understand which performance options are most appropriate to measure activities related to participants' goals and programs of study so that they can plan and monitor services and performance accordingly. Additionally, it is important that participants are aware of the program's plan for measuring their accomplishments.

Boosting Educational Outcome Performance

Overall, Texas AEL's performance on educational outcomes has lagged, as providers worked on redesigning systems and expanding local service delivery to increase Postsecondary Education or Training and employment objectives. For PY' 18-'19, a principal program objective is to boost both MSG and Credential Attainment performance.

WIOA allows multiple MSG options for AEL providers to measure and document performance. This letter separates MSG into two categories: those designed primarily to measure Basic Education competencies (Types 1a, 1b, and 2) and those designed primarily to measure attainment of Workforce Training skills provided through IET programs (Types 3, 4, and 5).

MSG for IET to Support Students

WIOA requires IET programs to document the integrated service delivery of contextualized Basic Education, Workforce Preparation activities, and Workforce Training through common learning objectives. Documentation of delivery is required in course syllabi beginning July 1, 2018. Documentation requirements are set forth in AEL Letter 07-17, issued December 13, 2017, and entitled, "Required Syllabus Design for Adult Education and Literacy Instruction, and any subsequent issuances. When providing integrated service delivery in IET programs, grantees are required to develop educational, training, and employability competencies. AEL grantees are expected to ensure that the Basic Education contextualized for Workforce Training is of sufficient rigor and duration to ensure success in Workforce Training, as set forth in AEL Letter 02-16, Change 1, issued October 13, 2016, and entitled, "Implementing the Integrated Education and Training Service Approach—*Update*," and any subsequent issuances.

Historical IET program performance has revealed that certain program models have inconsistent or weak provision of Basic Education (reading, writing, math, and English language), sometimes resulting in high failure rates among students. This weak performance reduces the likelihood of students successfully transitioning to or completing Postsecondary Education or Training. AEL grantees are required to ensure that the rigor and duration of the contextualized education provided in an IET is delivered to support the educational and career advancement of the participant.

TWC research on educational outcomes—largely based on the Pretest-Posttest (MSG Type 1a)—uncovered that, despite weaknesses in certain program models, overall, participants in IET programs perform better in MSG rates than participants not in IET programs. For PY’16 –’17, MSG rates for IET participants were 48 percent, compared to the overall participant rate of 34 percent.

Collecting MSGs that measure Basic Education competencies will:

- better ensure that participants successfully complete IETs and earn a Postsecondary Credential;
- support the potential for continued Postsecondary Education or Training and career advancement;
- place equal value on the Basic Education component of IET;
- support trainers and employers who need individuals with competency in Basic Education; and
- support advances in overall MSG attainment for Texas.

This AEL Letter clarifies that IET programs are required to support participant MSG gains through the alignment of both Basic Education and Workforce Training competencies with IET common learning objectives.

PROCEDURES:

No Local Flexibility (NLF): This rating indicates that AEL entities must comply with the federal and state laws, rules, policies, and required procedures set forth in this AEL Letter and have no local flexibility in determining whether and/or how to comply. All information with an NLF rating is indicated by “must” or “shall.”

Local Flexibility (LF): This rating indicates that AEL entities have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this AEL Letter. All information with an LF rating is indicated by “may” or “recommend.”

Definitions

NLF: AEL grantees must be aware of the following definitions:

Actively Coordinated Postsecondary Education or Training means Postsecondary Education or Training services that are not provided in the context of an IET but are services in which a participant is enrolled and supported through AEL Basic Education services actively coordinated by the AEL provider and the Postsecondary Education or Training provider. The Coenrollment must be consciously and deliberately executed by the AEL grantee and the postsecondary or training provider to support student success in the Postsecondary Education or Training program. An example of an Actively Coordinated program of study would be an AEL math class offered in only the first semester of the three-semester pharmacy technician training program that is contextualized for the training program and actively coordinated with the pharmacy training instructor to support participants in passing the pharmacy math portion of the training. Because no other Basic Education is provided simultaneously at any point

within the overall scope of the program, there is not a single set of learning objectives for the program of study, and no Workforce Preparation Activities are offered, this provision of services does not meet the requirements of the of IET model, but is an Actively Coordinated Postsecondary Education or Training program.

While Postsecondary Education or Training hours within an IET constitute an AEFLA qualifying service and are an allowable expenditure for the duration of an IET, Actively Coordinated Postsecondary Education or Training is neither a qualifying service nor an allowable expenditure.

Basic Education Activities (Basic Education) are programs and activities in the competencies of reading, writing, ESL, and mathematics.

Coenrollment, in the context of Postsecondary Credentials, takes two forms: 1) enrollment in an IET program, and 2) enrollment in an Actively Coordinated Postsecondary Education or Training program.

Both forms of Coenrollment must lead to a Postsecondary Credential, unless the participant was enrolled in an on-the-job training (OJT) or customized training program, which are activities excluded from the Credential Attainment measure because these training services usually do not lead to a Postsecondary Credential.

Participants enrolled in one of these two forms of Coenrollment are included in the Postsecondary Credential measure when they exit the Postsecondary Education or Training program.

Enrollment in a Postsecondary Education or Training program that is not actively coordinated would not be included in the performance denominator for Postsecondary Credential Attainment (for example, when participants enroll in a Postsecondary Education or Training course on their own, with no coordination between the AEL grantee and the Postsecondary Education or Training program).

Enrollment in developmental education, including college English for Speakers of Other Languages, is not considered a Coenrollment because these courses are prerequisites to acquire academic college readiness or English literacy and do not directly lead to a Postsecondary Credential.

Credential refers to both Postsecondary Credentials and HSE⁵ Credentials.

Credential Attainment is the number of exiters who are not excluded from the WIOA primary indicators of performance as indicated in this AEL Letter, who were:

- in IET (excluding OJT or Customized Training) or Actively Coordinated Postsecondary Education or Training and achieved a Postsecondary Credential during participation or within one year of Exit;
- in education at or above the secondary level, as defined in this AEL Letter, at any time during their period of participation, and achieved their HSE during participation or within one year of Exit, and:

⁵ In other WIOA core programs for youth, the credential includes achievement of the high school diploma.

- enrolled in a Postsecondary Education or Training program leading to a Postsecondary Credential at some point during the 365 days after exiting the program; or
- employed in any of the four calendar quarters after exiting the program.

Exit means the last day that a participant receives a participatory service. This date cannot be determined until 90 days after the participant last received participatory services and there are no future services arranged under a planned gap, as defined in TWC Technical Assistance Bulletin 281, issued August 23, 2017, and entitled, “Entering a Planned Gap in Services for Adult Education and Literacy Participants into the Texas Educating Adults Management System.” After 90 days of inactivity (and in the absence of a planned gap), Exit is retroactively established as the last day of participatory service. The Texas Educating Adults Management System (TEAMS) does not automatically calculate Exit, and AEL grantees cannot initiate Exit by separating a participant.

Measurable Skill Gain MSGs are a measure of the documented progress (academic, technical, occupational, or other) that a participant makes toward obtaining Basic Education, a credential, or reaching employment-related performance indicators.

There are two broad categories of MSG: those designed primarily to measure Basic Education activities (Types 1a, 1b, and 2) and those designed primarily to measure Workforce Training in IETs (Types 3, 4, and 5).

The following Basic Education MSG options are allowable for use with all participants in measuring Basic Education activities:

- **EFL MSG (Type 1):** Documented achievement of a gain in an educational functioning level (EFL) for participants receiving instruction below the postsecondary education level in one of the following types of EFL measures:
 - **Achievement on a Pretest-Posttest MSG (Type 1a):** Comparison of a participant’s initial EFL, as measured by a pretest, with the participant’s EFL, as measured by a posttest, using tests approved for AEL in Texas in accordance with the Assessment Guide. The EFL can be achieved in any domain, not just the Domain of Significance (DOS).
 - **Postsecondary Enrollment MSG (Type 1b⁶):** Enrollment in a Postsecondary Education or Training program that leads to a Postsecondary Credential after a participant exits AEL services. The participant must be below the postsecondary level in one or more domains, have no planned gap, and enroll in the Postsecondary Education or Training program after exit but within the same program year in which the exit occurred.
- **HSE Achievement MSG (Type 2):** Documented attainment of a recognized English- or Spanish-language HSE Credential during the program year. Participants may obtain either an in-state Texas Certificate of High School Equivalency (TxCHSE) or

⁶ Type 1b in OCTAE Program Memorandum 17-2 is listed as Type 1c. TWC uses Type 1b to avoid a confusing skip from Type 1a to Type 1c. OCTAE’s Type 1b MSG (awarding high school credits or Carnegie units) applies to states that implement adult high schools and does not apply in Texas.

an out-of-state HSE option that is approved for use when participating in AEFLA activities for that state.

The following Workforce Training MSG options measure Workforce Training for IET participants only:

- **Postsecondary Transcript or Report Card in IET MSG (Type 3):** A transcript or report card from a Postsecondary Education or Training program provider documenting that the IET participant is passing a full- or part-time college credit course load in an IET program of study that leads to a recognized Postsecondary Credential.
- **Progress Milestone in IET MSG (Type 4):** Documented attainment of satisfactory or better progress toward substantive skill development reported by an employer or training provider through one or more measures, to include, but not be limited to:
 - training reports on accomplishment milestones as the individual masters required job skills;
 - reports of successful completion of competencies necessary for completion of an OJT or Registered Apprenticeship program;
 - increases in pay resulting from Workforce Training; or
 - increased performance resulting from Workforce Training as documented by the employer.
- **Skills Progression in IET MSG (Type 5):** For participants enrolled in an IET, passing an exam that is required for a particular occupation, or progress made toward attaining technical or occupational skills, as evidenced by Trade-Related Benchmarks such as knowledge-based exams.

Planned MSG is the MSG identified during a participant's initial comprehensive assessment and forecast to be the most likely MSG to allow the individual to make performance gains. The forecast is based on the participant's level at intake, initial objectives, goals, and the program of study selected during enrollment. Because not all aspects of a participant's success can be forecast and a participant's program objectives may change, the Planned MSG may change.

Postsecondary Educational Enrollment (also called Educational Enrollment) means enrolling or coenrolling in a Postsecondary Education or Training program leading to a Postsecondary Credential rather than enrollment in an IET program.

Educational Enrollment is recorded in TEAMS to:

- document completion of one of the required post-Exit options to qualify an HSE Credential for the Postsecondary Credential Attainment measure;
- document achievement of a Postsecondary Enrollment MSG that requires a participant to be enrolled in Postsecondary Education or Training at some point after exiting but during the program year; and

- document enrollment in an Actively Coordinated Postsecondary Education or Training program that leads to a Postsecondary Credential for the Credential Attainment measure⁷.

Postsecondary Education or Training (also called Workforce Training) means any program that leads to a Postsecondary Credential⁸ that is awarded by one or more of the following entities:

- A state educational agency or a state agency responsible for administering vocational and technical education within a state
- An institution of higher education that is qualified to participate in financial assistance programs. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in federal financial aid programs.
- An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an American Indian tribe or tribes
- An organization or a product manufacturer or developer that uses a valid and reliable technique for assessing an individual's knowledge, skills, and abilities as an outcome measure of a training program. An organization is a professional, industry, or employer organization, such as the National Institute for Automotive Service, which offers a certificate of excellence, and the National Institute for Metalworking Skills, Inc., which offers a Machining Level I Credential. Product manufacturers or developers include Microsoft, which offers recognized Microsoft Information Technology certificates (such as a certificate for a Microsoft Certified IT Professional) and Novell, which offers certificates for a Certified Novell Engineer and a Sun Certified Java Programmer.
- The DOL Education and Training Administration (DOLETA) Office of Apprenticeship or a state apprenticeship agency
- A public regulatory agency that awards a credential when an applicant meets the educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (for example, a Federal Aviation Administration aviation mechanic license, or a state-licensed asbestos inspector)
- A program that has been approved by the US Department of Veterans Affairs to offer education benefits to veterans and other eligible individuals
- Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements

Postsecondary Education or Training programs that meet these criteria may include the following:

- Occupational skills training; for example, career and technical training delivered by a community or technical college

⁷ Postsecondary Education or Training that is a part of an IET program should be tracked only under *Training Services* in TEAMS, not under *Postsecondary Educational Enrollment*.

⁸ Excluding OJT and customized training, as these programs do not typically lead to a credential.

- Skills upgrading provided by an employer for its workforce, for example, training delivered as part of an IET program provided by an employer
- Entrepreneurial training
- Customized training, a significant portion of which is funded by the employer with the employer's commitment to hire an individual upon successful completion of the training, as described in WIOA §3(14)
- Registered Apprenticeship training
- OJT training coordinated through a Local Workforce Development Board (Board), as described in WIOA §3(44)

Recognized Postsecondary Credential (also called Postsecondary Credential) is an all-encompassing term used to describe any type of traditional or nontraditional credential awarded for education, training, or employee development.

Postsecondary Credentials for AEL include the following:

- **Industry-recognized occupational certificates or certifications** that are nontraditional awards that demonstrate, through examination, an individual's proficiency and knowledge in a specific industry or trade, not necessarily on completion of an education or training program.

Candidates for certification are evaluated by national, independent, third-party professional, and industry-based organizations. These organizations develop and maintain relevant proficiency standards that are assessed and sanctioned by industry-approved examinations facilities, independent of any educational institution or training program.

Examples of certificates and certifications include Certified Nurse Aide (Texas Health and Human Services Commission); Certified Logistics Associate (Manufacturing Skill Standards Council or MSSC); Level I Entry Welder (American Welding Society); A+, Network+, Server+, Security+ (Computing Technology Industry Association); Microsoft Office Specialist (Microsoft); and Heavy Equipment Operator (National Center for Construction Education and Research).

- **Apprenticeship certificate of completion** issued by TWC or by the DOLETA Office of Apprenticeship
- **Occupational licenses**, generally awarded by a government-regulated agency (usually state-regulated, but sometimes federal). Occupational licenses are mandatory for professional practice in their jurisdiction. A license is more heavily regulated and restrictive due to its governmental association, and it signals that an individual has completed or achieved certain standards. Licenses are often required for careers in the fields of health, public education, law, and finance and in the trades. Examples of occupations that require an individual to have a valid license include plumbers, electricians, real estate brokers, and nurses.
- **Recognized state occupational credit certificates and degrees** awarded by institutions of higher education that are qualified to participate in federal or state financial aid programs. Such certificates include occupational skills awards, Level I or Level II certificates, and associate or baccalaureate degrees. See the Texas Higher

Education Coordinating Board Guidelines for Instructional Programs in Workforce Education.

- **Recognized noncredit continuing education credentials (CE Credentials)** awarded by institutions of higher education. The continuing education program must:
 - teach the same workforce-related content and skills as for-credit postsecondary education and training programs;
 - be listed in the college's approved inventory of programs; and
 - provide graduates with an official transcript.

Examples of noncredit CE Credentials include occupational skills awards, as defined in the Texas Higher Education Coordinating Board Guidelines for Instructional Programs in Workforce Education. Noncredit continuing education programs that don't meet the criteria, however, may meet the criteria for an industry-recognized occupational certificate or certification. For example, Certified Nurse's Aide training typically does not have a for-credit postsecondary education and training program option; however, this training leads to an industry recognized certification.

Trade-Related Benchmarks refers to a variety of knowledge-based and competency-based exams that are administered to measure the skills gained, as related to specific Postsecondary Education or Training. The benchmarks include the following:

- Completion of a test necessary to obtain a credential; for example, the industry-recognized MSSC Certified Production Technician (CPT) certification has four component tests: safety, quality practices and measurement, maintenance awareness, and manufacturing processes and production. Each component test is a completion test necessary to obtain the MSSC CPT and would be a Trade-Related Benchmark that counts as a Skills Progression in IET MSG (Type 5).
- Employer-required knowledge-based exams
- Satisfactory attainment of one component of an industry or occupational competency-based assessment test
- Passing a component exam in a Registered Apprenticeship program

Trade-Related Benchmarks are not tests or exams administered by an educational institution for completion of coursework, such as a community college semester exam, but rather knowledge-based or competency-based exams required for a particular occupation. These exams must be given or validated by a third-party organization that issues certifications or licenses for the occupation for which the participant is testing.

Guidance

AEL Assessment Guide

NLF: AEL grantees must be aware that the following guidance described in the Assessment Guide applies only to participants in Achievement on a Pretest-Posttest MSG (Type 1a) measure:

- NRS Core Outcome Measures for Adult Basic Education (ABE), Adult Secondary Education (ASE), and ESL guidance, excluding Information under Frequency of Data Entry

- Posttesting guidance

Revisions to the Assessment Guide will resolve inconsistencies between this AEL Letter and the Assessment Guide.

MSG Performance for all Participants

NLF: AEL grantees must be aware that MSGs are measured as the percentage of all AEL participants enrolled in AEL activities, including intensive services, Integrated EL Civics, and IET, and who, during a program year, achieve an MSG measuring Basic Education.

MSG Performance for IET Participants

NLF: AEL grantees must be aware that to support the educational and career advancement of IET participants, providers must report and document MSGs that measure both Basic Education and Workforce Training performance. For PY'18-'19, performance of IET participants is calculated based on the Basic Education MSGs. Workforce Training MSGs must be reported at least once during the entire IET program of study, but are not included in the calculation of the MSG measure for PY'18-'19. (OCTAE is collecting data on workforce MSG utilization to consider future changes to the AEL performance methodology.)

Standard Operating Procedure

NLF: AEL grantees must develop and train staff on standard operating procedures (SOPs) that describe in sufficient detail a process for measuring progress and outcomes, including establishing Planned MSGs, that best align with the participant's goals and program. The Planned MSG gives providers and participants a clear path forward and must be identified for each participant shortly after the participant begins services to ensure that there is a participant-specific plan for what the participant will learn and how the participant will demonstrate MSG. Because not all aspects of a participant's success can be forecasted, providers must assume that, during the participant's engagement in the program, the Planned MSG may change, based on the participant's progress and goals.

The SOP must identify the program staff (staff positions) who make the planned designation; explain how participants, instructors, and other relevant staff members are informed about a participant's MSG status; explain the process for selecting an MSG type, based on a participant's performance, goals, objectives, or participation; and explain how plans for determining the best MSG type are modified when a participant's performance, goals, objectives, and/or participation change.

Additionally, the SOP must explain how, when, and by whom the appropriate documentation is collected to support the MSG entered into TEAMS.

Documentation of Participant Goals

NLF: AEL grantees must document participant goals as the goals relate to the Planned MSG in at least one of the following ways:

- In the participant's profile in TEAMS, using the participant's *Goals* option that most closely aligns with the MSG
- In the participant's file

Entering MSGs into TEAMS

NLF: AEL grantees must document into TEAMS all MSGs for which they have the appropriate documentation. MSGs must not be entered into TEAMS until documentation is collected and stored in the participant's file. Documentation must be collected within 30 days of achievement of the MSG.

MSGs for Basic Education (Types 1a, 1b, and 2)

Achievement on a Pretest-Posttest MSG (Type 1a)

NLF: AEL grantees must be aware of the following pretesting and posttesting procedures:

- To earn an Achievement on a Pretest-Posttest MSG, participants must achieve a gain in any content domain, not just the DOS. TWC will still use the DOS to establish the level at which the participant is placed for reporting purposes; however, a gain that occurs in any domain will count for the measure.
- Numeracy descriptors are allowed for ESL participants, and speaking and listening descriptors are allowed for participants in ABE and ASE, if the participants' needs and the program's instruction warrant such an approach.
- For IET participants, testing might only be in the Basic Education domain identified as most critical for the participant to succeed in Workforce Training, as documented on the syllabus' common learning objectives.
- Achievement on a Pretest-Posttest MSG is documented in TEAMS by entering the test in accordance with the requirements published in the Assessment Guide.

Postsecondary Enrollment MSG (Type 1b)

NLF: AEL grantees must be aware that to attain a Type 1b MSG, a participant must:

- exit AEL services and have no planned gap; and
- after Exit, be enrolled in a Postsecondary Education or Training program that leads to a Postsecondary Credential during the same program year. Developmental education, including college English for Speakers of Other Languages and student development courses, does not meet this requirement, as these courses are prerequisites to Postsecondary Education or Training.

NLF: AEL grantees must obtain and file enrollment documentation in a Postsecondary Education or Training program. Examples of enrollment documentation include:

- official verification of enrollment;
- a transcript showing proof of enrollment;
- proof of enrollment in a Registered Apprenticeship program, such as:
 - an agreement or contract with the apprenticeship program;
 - a DOL registration card for a registered apprentice; or
 - a log of contact hours, posted by the apprentice or the training instructor, that tracks 2,000 hours toward program completion;
- an employer's documentation of enrollment in employer-led training leading to a Postsecondary Credential; or
- other forms of documentation deemed appropriate by TWC's AEL staff.

NLF: AEL grantees must ensure that appropriate staff documents Postsecondary Enrollment MSG in TEAMS by adding a new MSG record on the *Educational Outcomes* screen.

HSE Achievement MSG (In-State, Type 2)

NLF: AEL grantees must be aware that:

- English- and Spanish-language HSE versions of tests approved to earn a TxCHSE are allowable; and
- to attain an in-state HSE Achievement MSG, the participant must be awarded and receive a TxCHSE that is dated on or before the end of the program year.

NLF: AEL grantees must be aware that the achievement of passing an in-state HSE exam earns the participant a TxCHSE awarded by the Texas Education Agency (TEA). This documented record is verified only through a data match with TEA and is available in TEAMS. AEL grantees must ensure that the participant's name and date of birth match what the participant gives the HSE testing center at the time of testing. The spelling of the participant's name must be entered into TEAMS exactly as it was provided by the participant—including spaces, hyphens, and capitalization. For example, if "De la Cruz" is entered into TEAMS, but the name that the participant gave to the HSE testing center is "Dela Cruz" or "Delacruz," the name entered into TEAMS will not match the TEA database. Matches are verified through TEA directly, and not through a third-party vendor, such as the GED Testing Service.

HSE Achievement MSG (Out-of-State, Type 2)

NLF: AEL grantees must be aware that:

- English- and Spanish-language HSE exams are allowable; and
- to attain an out-of-state HSE Credential:
 - the participant must pass an HSE exam and be awarded an HSE Credential that meets the standards of the state in which the credential is earned; and
 - the AEL grantee must obtain and file a copy of the official documentation of the out-of-state HSE Credential provided by the state in which the certification was earned.

NLF: AEL grantees must ensure that appropriate staff documents achievement of an out-of-state HSE Credential by adding a new MSG record in TEAMS on the *Educational Outcomes* screen.

MSGs for Workforce Training (Types 3, 4, and 5)

Postsecondary Transcript or Report Card in IET (Type 3)

NLF: AEL grantees must be aware of the following requirements to attain the Postsecondary Transcript or Report Card in IET MSG:

- Participants must earn a transcript or report card documenting that the participant is passing a full- or part-time college credit course load in an IET program of study that leads to a recognized Postsecondary Credential. Developmental education, including college English for Speakers of Other Languages and student development courses, does not meet this requirement, as these courses are prerequisites to postsecondary education and training and do not lead to a Postsecondary Credential.
 - Full-time is 12 college credit hours per semester of credit coursework required for the academic program.

- Part-time is a total of at least 12 college credit hours of college credit coursework over the course of two completed semesters during a 12-month period. If the two semesters span two program years, the AEL grantee would not earn MSG performance under this measure in the first program year, but would earn MSG performance in the second program year.
- Passing is determined by the academic standards of the Postsecondary Education or Training provider.
- The AEL provider must:
 - obtain and file a transcript or report card documentation from the Postsecondary Education or Training provider awarding the recognized Postsecondary Credential showing that the participant is passing each course; and
 - document the MSG by adding a new MSG record in TEAMS on the *Educational Outcomes* screen.

Progress Milestone in IET MSG (Type 4)

NLF: AEL grantees must be aware that to attain a Progress Milestone in IET MSG:

- a participant must make satisfactory or better progress toward substantive skill development in a Workforce Training or employment milestone identified by an employer; and
- the AEL provider must:
 - document the MSG by adding a new MSG record in TEAMS on the *Educational Outcomes* screen; and
 - identify appropriate methodologies and documentation for satisfactory or better progress toward the milestone, based on the Workforce Training competencies being provided. Milestones include, but are not limited to:
 - training reports on accomplishment milestones completed as the individual masters the required job skills;
 - reports of successful completion of competencies necessary for completion of an OJT or Registered Apprenticeship program;
 - increases in pay resulting from newly acquired skills; and
 - increased performance as documented by the employer.

Skills Progression in IET MSG (Type 5)

NLF: AEL grantees must be aware that to attain a Skills Progression in IET MSG:

- the participant must:
 - successfully pass an exam that is required for the particular occupation, which may include a credentialing exam required to earn a certificate, certification, or license; or
 - make progress in attaining technical or occupational skills as evidenced by Trade-Related Benchmarks, such as knowledge-based exams (for example, completing one portion of the credentialing exam required to earn a license or certification); and
- the AEL provider must:
 - obtain and file documentation from the awarding entity or employer showing achievement of the gain; and

- document the MSG by adding a new MSG record in TEAMS on the *Educational Outcomes* screen.

Credential Attainment (Types)

NLF: AEL grantees must be aware that the Credential Attainment measure includes both Postsecondary Credentials and HSE⁹ Credentials. While there is one Credential Attainment measure, Postsecondary Credentials and HSE Credentials have unique criteria that are related to the participants who are included under the measure.

Performance Period for Credential Attainment

NLF: AEL grantees must be aware that, for AEL participants, the performance period for Credential Attainment is during participation in the program or within one year after exiting.

Credentials Allowed as Workforce Training MSGs but not for the Credential Attainment Measure

NLF: AEL grantees must be aware that certificates or certifications for short-term interim Postsecondary Credentials, such as the Occupational Safety and Health Administration's (OSHA) 10-hour course completion card, ServSafe (National Restaurant Association Educational Foundation), or CPR (American Red Cross) are not included in the Credential Attainment measure; however, short-term interim certificates or certifications such as these can be used as interim Workforce Training MSGs (Skills Progression MSG, Type 5). For example, an OSHA 10-hour course completion card could be used as a Skills Progression MSG in an Apartment and Building Maintenance program in which a Level I certificate is the credential. Similarly, a ServSafe certification could be used as a Skills Progression MSG in a continuing education program for Hospitality and Food Management if the participant earns a CE Credential.

Disallowed Credentials

NLF: AEL grantees must be aware that the following certificates and certifications are not considered credentials, because they do not document the measurable technical or industry/occupational skills necessary to find employment or advance within an occupation:

- Certificates awarded by Boards
- Work-readiness certificates
- Certificates of completion that are awarded for attendance or for meeting criteria; for example, a certificate of completion awarded by a noncredit community college for a Microsoft Office preparation course is not a Postsecondary Credential unless the course curriculum meets the criteria of a CE Credential, as defined in this letter.

Credential Attainment Based on HSE

NLF: AEL grantees must be aware that to receive credit for an HSE Credential, a participant must be at the secondary level, which is defined as the participant:

⁹ In other WIOA core programs for youth, credentials include achievement of the high school diploma.

- either:
 - being at the ninth-grade equivalent level in all domains (ASE low level; ASE high level) at some point during participation; or
 - indicating the intention to earn an HSE Credential by passing at least one section of an HSE exam during participation;
- having exited the program;
- lacking a high school diploma or an HSE Credential; and
- receiving an HSE Credential during participation or within one year of exiting the program and either:
 - being enrolled in a Postsecondary Education or Training program leading to a Postsecondary Credential at some point during the 365 days after exiting the program; or
 - being employed in any of the four calendar quarters after exiting the program.

Credential Attainment Based on Spanish HSE Exam

NLF: AEL grantees must be aware that to receive a TxCHSE that is offered in Spanish, the participant must:

- either:
 - have the Limited English Proficient indicator marked in the participant's profile in TEAMS; or
 - place into one ESL-level test during the period of participation;
- lack a high school diploma or an HSE Credential from the United States or the participant's country of origin;
- indicate the participant's intention to earn an HSE Credential by passing at least one section of an HSE exam during participation;
- have exited the program; and
- receive an HSE certificate during participation or within one year of exiting the program and either:
 - be enrolled in a Postsecondary Education or Training program leading to a Postsecondary Credential at some point during the 365 days after exiting the program; or
 - be employed during any of the four calendar quarters after exiting the program.

Credential Attainment Based on a Postsecondary Credential

NLF: AEL grantees must be aware of the following:

- Participants in Postsecondary Education or Training are included in the Credential Attainment measure if the following are true:
 - The participant is Coenrolled in either an IET or Actively Coordinated Postsecondary Education or Training program, and then exits the Postsecondary Education or Training program; and
 - The participant earns a Postsecondary Credential either during the periods of participation or within 365 days after exiting a Postsecondary Education or Training program.

Coenrollment End Dates

NLF: AEL grantees must be aware that the end date for a Coenrollment in IET and Actively Coordinated Postsecondary Education or Training is defined as follows:

IET

The end date for a Coenrollment in an IET program is:

- the date that the participant completes the Basic Education activities of the IET, as indicated by the last day that direct or proxy hours are entered into TEAMS; or
- the date that the Workforce Training portion ends, as indicated by a completion date in TEAMS, up to 60 days after the end of the Basic Education portion of the IET.

Actively Coordinated Postsecondary Education or Training

The end date for a Coenrollment in an Actively Coordinated program of study is:

- the day that the participant exits from Basic Education classes, as indicated by the last day that direct or proxy hours are entered into TEAMS; or
- the end date of post-exit Educational Enrollment, entered on the *Educational Outcomes* screen, up to 60 days after the Basic Education class has ended.

If the Educational Enrollment ends more than 60 days after the participant has exited Basic Education classes, the Coenrollment is considered over on the 60th day after the class ended.

Documenting Postsecondary Credentials

NLF: AEL grantees must be aware that Postsecondary Credentials are documented by adding a new record to the *Educational Outcomes* screen in TEAMS.

Overall Performance Exclusions

NLF: AEL grantees must be aware of the following exclusions:

- The data for participants who are enrolled in education programs while incarcerated in correctional institutions and remain incarcerated at Exit from the program are excluded from all indicators except MSG, as are other institutionalized individuals, as defined by WIOA §225.
- The data for participants who exit services due to the following circumstances are excluded from the WIOA primary indicators of performance:
 - The participant exits the program because he or she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support, such as a hospital or treatment center, while receiving services. (Individuals who are enrolled in WIOA §225 corrections-funded services are included in the MSG measure.)
 - The participant exits the program because of medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
 - The participant exits the program because the participant is a member of the National Guard or other reserve forces and is called to active duty for at least 90 days.
 - The participant dies.

NLF: AEL grantees must document the reason for exclusion on the *Participant Profile* screen in TEAMS.

NLF: Because the Workforce Training does not typically lead to any credential, AEL grantees must be aware that participants are excluded from the Postsecondary Credential measure, if they are enrolled in an IET program or Actively Coordinated Postsecondary Education or Training that includes only OJT or customized training.

INQUIRIES:

Send inquiries regarding this AEL Letter to aelpolicy.clarifications@twc.texas.gov.

ATTACHMENTS:

Attachment 1: Revisions to AEL Letter 01-18 Shown in Track Changes

REFERENCES:

Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act. National Reporting System for Adult Education. December 2017.

US Department of Education Office of Career, Technical, and Adult Education Program Memorandum 17-2, issued on December 19, 2016; revised on August 23, 2017, and entitled, “Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs,” <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-2.pdf>

US Departments of Labor and Education, WIOA common performance reporting specifications approved by the US Office of Management and Budget initially in June 2016 and with modifications in March 2018. OMB Control Number 1205-0526.

US Department of Labor Employment and Training Administration, Training and Employment Guidance Letter No. 10-16, issued on December 19, 2016, and entitled, “Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs.”

Workforce Innovation and Opportunity Act of 2014, §116, Performance Accountability System

Texas Higher Education Coordinating Board Guidelines for Instructional Programs in Workforce Education, 2015.

[AEL Letter 02-16, Change 1, issued on October 13, 2016, and entitled, “Implementing the Integrated Education and Training Service Approach—Update,” issued on October 13, 2016, and any subsequent issuances](#)

Technical Assistance Bulletin 281, issued on August 23, 2017, and entitled, “Entering a Planned Gap in Services for Adult Education and Literacy Participants into the Texas Educating Adults Management System.”

AEL Letter 07-17, issued on December 13, 2017, and entitled, “Required Syllabus Design for Adult Education and Literacy Instruction,” and any subsequent issuances, <https://www.twc.texas.gov/sites/default/files/wf/policy-letter/ael/ael-07-17-ch1-twc.pdf>