

1 **TEXAS WORKFORCE COMMISSION**  
2 **Adult Education and Literacy Letter**

<b>ID/No:</b>	AEL 03-21
<b>Date:</b>	May 17, 2021
<b>Keyword:</b>	AEL; WIOA
<b>Effective:</b>	Immediately

3 **To:** Adult Education and Literacy Grant Recipients  
4 Adult Education and Literacy Special Project Grantees  
5 Local Workforce Development Board Executive Directors  
6 Commission Executive Offices  
7 Integrated Service Area Managers



8 **From:** Courtney Arbour, Director, Workforce Development Division

10 **Subject:** Allowability of Funding Transportation Support Services with Adult Education  
11 and Family Literacy Act Funds

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13 **PURPOSE:**

14 The purpose of this AEL Letter is to provide Adult Education and Literacy (AEL)  
15 grantees<sup>1</sup> with information and guidance on allowable funding of transportation services  
16 using Adult Education and Family Literacy Act (AEFLA) statewide grant funds.

17 **RESCISSIONS:**

18 None

19 **BACKGROUND:**

20 This AEL Letter clarifies that certain transportation services may be funded with AEFLA  
21 funds to support AEL participants' success in the program. Workforce Innovation and  
22 Opportunity Act (WIOA) §231(e) outlines the 13 considerations that state agencies must  
23 weigh when awarding an AEL statewide grant, one of which requires AEL grantees to  
24 coordinate with other agencies to provide support services that enable AEL customers to  
25 complete the program. This consideration aligns with WIOA's objective of expanding  
26 access to such services for individuals with barriers to employment so that they can  
27 succeed in a modern local economy.

28 Grant awards under RFP 320-18-01, which began to be awarded July 1, 2018, included a  
29 prohibition on costs for support services, defined in WIOA §3(59) as "services such as

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<sup>1</sup> For the purposes of this AEL Letter, AEL grantees are entities that receive AEL funds through the Texas Workforce Commission (TWC).

1 transportation, child care, dependent care, housing, and needs-related payments that are  
2 necessary to enable an individual to participate” in WIOA programs.

3 In March 2020, the Office of Career, Technical, and Adult Education (OCTAE)  
4 recommended that TWC remove this cost prohibition. OCTAE clarified that not all  
5 support services provided under WIOA’s definition are allowable or necessary to support  
6 an AEL participant’s progress in an AEL program, although, for AEL participants,  
7 transportation and child care services that are deemed necessary, reasonable, and  
8 allocable by TWC may be considered allowable as a support service.

9 This AEL Letter provides guidance on transportation services that are allowable under  
10 the AEFLA statewide grant. TWC may issue guidance on other allowable support  
11 services at a future date.

12 **PROCEDURES:**

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

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

21 **NLF**: AEL grantees must be aware that the expenditure limitation related to transportation  
22 support services and outlined in RFP 320-18-01 §16.10.5 is lifted.

23 **NLF**: AEL grantees must identify the support service needs of an individual enrolling in AEL  
24 services during the comprehensive assessment process, as required under §5.8 of the AEL  
25 grant awards.

26 **NLF**: AEL grantees must be aware that the following transportation expenses are allowable  
27 costs payable with AEFLA funds for AEL participants:

- 28 • Bus or other public transit passes, tokens, tickets, and the like
- 29 • Prepaid vouchers for ride-sharing services
- 30 • Prepaid gas cards
- 31 • Service contracts between the AEL grantee and shuttle services or transit  
32 providers to provide transportation services for AEL participants

33 **NLF**: AEL grantees must ensure that there are no available federal, state, or local funds for  
34 transportation support services before using AEFLA funds for this purpose, as required  
35 by the “supplement not supplant” rule found at WIOA §241(a).

36 **NLF**: AEL grantees must develop a transportation support service acknowledgment form, to be  
37 signed and dated by the individual receiving the services, which contains:

- 1 • an acknowledgment of the purpose of transportation services;
- 2 • a statement establishing the allowable use of transportation services for the AEL
- 3 program;
- 4 • an assurance that the individual has not received transportation services from another
- 5 AEL program for the same purpose; and
- 6 • an assurance that the individual will use transportation services as explained by the
- 7 AEL grantee.

8 The AEL grantee must maintain this form in the participant's file.

9 **NLF**: AEL grantees must create a transportation support services standard operating procedure  
10 that addresses the following elements:

- 11 • Which AEL program staff members are responsible for the disbursement, oversight,
- 12 and management of transportation services to AEL participants
- 13 • How the grantee will determine:
  - 14 ➤ when transportation services will be offered to a participant; and
  - 15 ➤ for how long services will be available to a participant
- 16 • With what frequency the grantee will reassess the support service needs of an AEL
- 17 participant and modify the referral to support services or provision of transportation
- 18 support services, as appropriate
- 19 • What maximum dollar amount of transportation expense funds a participant may
- 20 receive within a given time frame (Example: "To support program participation, an
- 21 AEL participant may receive a maximum of \$25 each week in transportation
- 22 expenses, which could include prepaid gas cards or bus passes.")
- 23 • What controls are in place to minimize waste or loss of transportation cards, tokens,
- 24 and so forth
- 25 • What internal controls are in place for determining that any transportation costs are:
  - 26 ➤ necessary, reasonable, and allocable to the AEFLA grant; and
  - 27 ➤ based on a participant's need for transportation assistance to support program
  - 28 participation and/or completion
- 29 • Documentation justifying support services in the participant's file and in the Texas
- 30 Educating Adults Management System (TEAMS), including the following:
  - 31 ➤ The date the AEL grantee approves the justification
  - 32 ➤ Documentation of the AEL participant's signed acknowledgment form on
  - 33 allowable use of transportation services
  - 34 ➤ The type of transportation service being provided
  - 35 ➤ Why transportation services are needed for the participant to be successful in
  - 36 the AEL program
  - 37 ➤ How long the transportation services will be available to the participant
- 38 • Monitoring, internal controls, and accountability of transportation transactions and
- 39 documentation to ensure compliance with federal, state, and local policies, including:
  - 40 ➤ 2 CFR Part 200, the Office of Management and Budget's "Uniform
  - 41 Administrative Requirements, Cost Principles, and Audit Requirements for
  - 42 Federal Awards"; and

- 1                   ➤ TWC’s Financial Manual for Grants and Contracts, available at  
2                   <https://twc.texas.gov/agency/financial-manual-grants-contracts>  
3                   • A reconciliation of distributed transportation services against the Cash Draw and  
4                   Expenditure Reporting (CDER) system by the monthly data validation date

5 **NLF:** AEL grantees must track transportation services in the CDER system in the transportation  
6 assistance supplemental cost category under program costs when it becomes available in  
7 the CDER system.

8 **NLF:** AEL grantees must provide a narrative on the use of transportation support services in the  
9 quarterly narrative report.

10 **NLF:** AEL grantees must document the transportation services provided to a participant in the  
11 participant’s file and in the Participant Note Details screen in TEAMS. AEL grantees  
12 must document in the participant’s file and in TEAMS any changes to the transportation  
13 services being provided to a participant.

14 **NLF:** Grantees must enter the transportation support service in TEAMS on the Support  
15 Services page on the participant’s record when this functionality becomes available.

16 **LF:** AEL grantees may partner with community agencies or nonprofit organizations through a  
17 vehicle resource cost-sharing agreement to provide transportation services based on fixed  
18 routes that connect AEL participants to:

- 19                   • AEL classes;  
20                   • workforce training sites;  
21                   • Workforce Solutions Offices; and  
22                   • locations offering support services for AEL participants.

23 **LF:** It is recommended that AEL grantees work with Workforce Solutions Office staff to  
24 develop best practices in overseeing transportation support services.

25 **INQUIRIES:**

26                   Send inquiries regarding this AEL Letter to [AELpolicy.clarifications@twc.state.tx.us](mailto:AELpolicy.clarifications@twc.state.tx.us).

27 **REFERENCES:**

28                   Workforce Innovation and Opportunity Act  
29                   TWC Financial Manual for Grants and Contracts,  
30                   <https://www.twc.texas.gov/agency/grant-administration-financial-reporting>  
31                   RFP 320-18-01 Contracts