

# Adult Education and Family Literacy

# Grant Management Handbook

# FY 2023

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# COMMONLY USED ACRONYMS

|  |  |
| --- | --- |
| AEFL | Adult Education & Family Literacy |
| ADA | Americans with Disabilities Act of 1990 |
| AE | Adult Education |
| AEFLA | Adult Education and Family Literacy Act |
| ALC | Adult Learning Center |
| C/I | Correctional/Institutional |
| C.F.R | Code of Federal Regulations |
| CTIMS | CareerTech Information Management System |
| D&E | Direct and Equitable |
| DUNS | Data Universal Numbering System |
| FFATA | Federal Funding Accountability and Transparency Act |
| HSE | High School Equivalency |
| EDGAR | Education Department General Administrative Regulations |
| EFL | Educational Functional Level |
| EL/Civics | English Literacy/Civics |
| ELL | English Language Learner |
| ESL | English as a Second Language |
| FA | Funding Agreements |
| FERPA | Family Educational Rights and Privacy Act |
| FSR | Financial Status Report |
| FY | Fiscal Year |
| GAAP | General Accepted Accounting Principles |
| HSE | High School Equivalency |
| IELCE | Integrated English Literacy and Civics Education |
| LACES | Literacy, Adult and Community Education System |
| LEA | Local Education Agency |
| MIS | Management Information System |
| MOE | Maintenance of Effort |
| MSG | Measurable Skill Gains |
| NRS | National Reporting System |
| OCAS | Oklahoma Cost Accounting System |
| OCTAE | Office of Career, Technical, and Adult Education |
| ODCTE | Oklahoma Department of Career & Technology Education |
| POP | Period of Performance |
| PY | Program Year |
| UGG | Uniform Grant Guidance |
| USDOE | United States Department of Education |
| WIOA | Workforce Innovation and Opportunity Act |

# OKLAHOMA ADULT EDUCATION FAMILY LITERACY GRANTS

The Oklahoma Department of Career and Technology Education (ODCTE), Adult Education Family Literacy (AEFL) Division acts as the pass-through agency for the Adult Education Family Literacy Act (AEFLA) grants. The AEFLA, a federal law, can be found in Title II of the Workforce Innovation and Opportunity Act (WIOA) which was signed by President Barack Obama in 2014. Part of the AEFLA’s stated purpose is to assist adults with becoming literate, obtaining the knowledge and skills necessary for employment and self-sufficiency, and obtaining the skills necessary to lead to sustainable improvements in the economic opportunities of their family. In addition, to the federal grants provided under the AEFLA, ODCTE-AEFL Division also administers adult education allocations supported with state funds. Subject to availability, eligible recipients may apply for and be awarded any or all of the following grants:

A. Adult Education Federal Grants

* Adult Education and Literacy - 731
* English Literacy/Civics - 732
* Adult Education Services to Corrections and Institutionalized Individuals – 733

B. 319 State Allocation

ODCTE-AEFL Division requires that the federal and state program awards adhere to the same authoritative regulations for AEFLA funds regarding allowable expenditures. Since the state is required to complete annual FSR reports and show that it matched all AEFLA funds spent on administration with nonfederal funds, ODCTE-AEFL Division uses the state flow-through amount to recipients as part of the applicable match. Recipients shall not use federal and state funds for the administration of the high school equivalency (HSE) testing program.

## Local Grant Applications and Grant Continuation

Local Adult Education Family Literacy (AEFL) providers are required to apply to be an Adult Education provider through a competitive grant application process. Selected applicants will be allocated AEFLA grant funds and/or state grant funds. The application shall contain such information and assurances, including but not limited to –

1. a description of how funds awarded under this title will be spent consistent with the requirements of the AEFLA;
2. a description of any cooperative arrangements the eligible applicant has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
3. a description of how the recipient will provide services in alignment with the local plan under WIOA Section 108, including how the recipient will promote concurrent enrollment in programs and activities under Title I of the WIOA, as appropriate;
4. a description of how the recipient will meet the state adjusted levels of performance described in Section 116(b)(3) of the WIOA, 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) of the WIOA, 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) of the WIOA, as applicable.

Continuation of the award during this four-year grant cycle will be dependent on the satisfactory implementation of the programs and services outlined under AEFLA.

# BUDGET AND REIMBURSEMENT

This section describes the budget and reimbursement process for ODCTE-AEFL grants, as well as the fiscal policies and procedures.

## Funding Agreements (FA)

The grant funds received by the local eligible program shall be expended for the purpose of the grant and in a manner consistent with fiscal requirements. Grant funds will be distributed utilizing a performance- and needs-based funding formula. After the subawards are determined, funding agreements (FAs) are issued to successful grant applicants and budgets must be prepared for the FA amount.

FAs will include the following: (1) federal project code; (2) state project code; (3) CFDA#; (4) IDC rate; (5) Federal Admin Cap; (6) subrecipient name; (7) subrecipient’s unique identifier (UEI #); (8) superintendent/director; (9) subrecipient’s address; (10) congressional district; (11) subrecipient’s phone #; (12) federal award program or project title; (13) local project director (14) period of performance dates; (15) local share match required by subrecipient; (16) federal award identification number (FAIN), (17) project year award date (PY); (18) amount of federal funds obligated by this action; (19) amount of state funds obligated by this action; (20) total awarded by ODCTE to subrecipient.

## General Budget Form Information

### Federal Awards [AEFLA Section 233 (a)]

Recipients must classify all proposed expenditures within two types of service categories:

1. **Instructional Costs -** At least 95% of federal funds must be expended for adult education instructional activities. Examples of allowable costs may include:

* Salaries and benefits of instructors;
* Instructional expenses including supplies and equipment used by students;
* Curriculum.

1. **Administrative Costs -** Administrative costs may not exceed 5% of the total grant award. Under AEFLA section 233(a)(2), local administration activities can include accountability reporting and professional development. Examples of allowable costs may include:

* Salaries of program administrators, supervisors;
* Non-instructional expenses;
* One-stop center infrastructure costs and shared costs;
* Planning;
* Clerical (personnel involved in clerical activities);
* Administrative fringe benefits as required for salaried positions;
* Administrative travel to state meetings relating to administering adult education courses and educational activities; and
* Indirect Costs (if applicable).

Note: AEFLA subawards to local programs are restricted to a five percent cap on administrative costs that can be charged to the federal dollars. Although the budget must differentiate the Instructional and Administrative costs for the planned activities, if approved in writing by the AEFL Division, the administrative allowance may exceed the five percent cap.

### State Awards/Funds (Project Code 319)

Recipients must classify all proposed expenditures within two types of service categories:

1. **Instructional Costs**
2. **Administrative Costs**:

Not more than five percent of a local grant to an eligible provider can be expended to administer the adult education and literacy grant. In cases where five percent is too restrictive to perform administrative activities, the eligible provider may negotiate with the ODCTE an adequate level of funds to be used for non-instructional purposes. Administrative costs include: planning; administration including carrying out performance accountability requirements; professional development; providing adult education and literacy services in alignment with local workforce development area plans; carrying out the one-stop partner responsibilities, including contributing to the infrastructure costs of the one-stop delivery system. As with all adult education and literacy expenditures, administrative costs must be allowable, necessary, and reasonable. The five percent administrative cost limit or negotiated administrative cost limit applies to federal, state, and local adult education and literacy activities. Examples of disallowed costs include: bad debts; contingencies; entertainment; food; alcoholic beverages; fines/penalties; fundraising; lobbying; promotional items; unused leave payouts; tuition and fees; construction; and acquisition of property.

State awards/funds must be expended in the fiscal year awarded and may not be carried forward to the next fiscal year. Unspent state funds at the end of the fiscal year will be returned to ODCTE/AEFL. Local Programs that close will repay state funds that have not been expended.

### Correctional Facility/Institutionalized Individuals Educational Services

ODCTE-AEFL Division supports educational programs for criminal offenders in correctional institutions and for other institutionalized individuals. ODCTE will allocate ten percent of the federal funds available for allocation directly to the Oklahoma Department of Corrections. All other services to these populations will be restricted to local programs who receive special allocations, which local programs must apply for separately from the regular Adult Education federal funds. Local programs receiving corrections subawards shall give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Local programs wishing to spend additional money on corrections education may spend up to five percent of their state funds

Correctional institutions may include any “prison, jail, reformatory, work farm, detention center, or halfway house, community-based rehabilitation center or any other similar institution designed for the confinement or rehabilitation of criminal offenders.” [WIOA, Section 225]

Recipients must also classify all proposed correctional expenditures within two types of service categories:

1. **Instructional Costs** *(Refer to the Federal Fund Award information listed above.)*
2. **Administrative Costs** *(Refer to the Federal Fund Award information listed above.)*

# CTIMS (CAREERTECH INFORMATION MANAGEMENT SYSTEM)

Successful applicants’ federal allocations will be uploaded to the Careertech Information Management System (CTIMS) financial system. CTIMS includes the following forms:

1. Worksheet
2. Agreement
3. Invoice

In filling out the forms, subgrantees should adhere to the following policies and procedures:

## Worksheet

1. Complete the Funding Request Details which include the following:
2. Federal Funding Accountability and Transparency Act (FFATA) information collection requirements
3. Budget narrative
4. Attachments-All job descriptions ***must*** be attached that are not coded 1000/100. ***The job descriptions must be the official job descriptions on file with your Personnel/Human Resources Department at your organization.***
5. Select “Save and Next”
6. Complete budget line items.
7. Enter budget line description.
8. Type required units (1).
9. Enter required unit cost.
10. Type required unit type (enter “cost per each”)
11. Acknowledgement Section must be checked and a note must be entered.
12. Select “Submit for Approval”

*NOTE*: The information above reflects the steps of the Local Initiative Coordinator. The Worksheet must be approved by the Local Finance Coordinator, Superintendent/President and AEFL-State Initiative Supervisor.

## Agreement (Budget)

1. Under the Budget line items, enter the OCAS coding for each of the line items.
2. Acknowledgement Section must be checked, and a note must be entered.
3. Select “Submit for Approval”

*NOTE*: The agreement submission is the responsibility of the Local Finance Coordinator. The agreement must be approved by the AEFL-State Initiative Supervisor.

***The worksheet and agreement MUST be entered and submitted for approval to the AEFL Division no later than September 15.***

## Invoice Process

1. Select new invoice to start the invoice process.
2. Select “Save and Next”
3. Under the invoice line items, select each budget line item you would like to invoice.
4. Select edit and enter unit cost to match the invoice you are requesting payment.
5. Verify the total invoiced is correct for the amount of reimbursement you are requesting.
6. Attach the OCAS expenditure summary and detailed reports and applicable receipts and invoices. Family Literacy lesson plans must be attached for all family literacy purchases. **Expenditure Summaries, Budget Analysis and Expenditure Analysis will no longer be accepted. Detailed and Summary Expenditure Quarterly Reports are required**.
7. Check required acknowledgements and enter required date range.
8. Select “Submit for Approval”

*NOTE*: The invoice submission is the responsibility of the Local Finance Coordinator. The invoice must be approved by the AEFL-State Initiative Supervisor. Reimbursement requests must be submitted monthly—**or at least quarterly**—during the year.

Recipients are held to the five percent administrative cost rate or the negotiated rate of actual expenditures, not budgeted. Each invoice/claim must be submitted at the site’s negotiated administrative cost rate. The site may elect to apply indirect costs/administrative costs to their grant until the final claims. If sites elect to invoice above their approved administrative rate, they must complete an estimated year-end projection. The projection must be approved ***before*** invoices are approved. A projection template is available on the [AEFL Resources page](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/resources).

## Change Request Process

A change request must be initiated after a worksheet, agreement or invoice has been submitted for approval. This places the form/document in edit mode. If the worksheet, agreement or invoice has been rejected, a change request must be initiated. The change request cancels the worksheet/agreement/invoice process. The document(s) must be re-certified.

Once a change request is initiated by a user, it must be completed by the same user. Change requests are author based, not role based.

Please refer to the [AEFL CTIMS Technical Guidebook](https://www.okcareertech.org/about/state-agency/divisions/imd/ctims/dams-ctims/ABECTIMSGuideboookrevised1282020.pdf) for more detailed instruction.

## CTIMS Process Flow Chart

**Worksheet Approval**

AEFL Local Initiative Coordinator

AEFL Local Finance Coordinator

AEFL Local Superintendent/CEO

AEFL State Initiative Supervisor

ODCTE Finance Reviewer

AEFL State Supervisor

AEFL Local Finance Coordinator

AEFL State Supervisor

AEFL Local Finance Coordinator

**Invoice Approval**

**Agreement Approval**

# STATE, LOCAL BUDGETS AND REQUIRED REPORTS

## State and Local Budgets

The following budgets are due no later than September 15 each year:

1. State Matching budget (Project 319)
2. Local (project 001-298) or in-kind

Local providers must submit a State budget and a Local budget. Budgets must adhere to the AEFLA federal requirements on allowable program cost. Budgeted in-kind contributions must follow the federal match guidelines in the Uniform Grant Guidance-CFR Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; 306—Cost Sharing or matching. The budgets ***must*** be signed and dated by the superintendent/president or authorized representative. Budget information must be submitted via email to ODCTE’s AEFL Financial Analyst.

**Project 319 Expenditure Reports and Local Expenditure Reports**

Project 319 expenditure reports (detailed and summary) and local (project 001-298) expenditure reports (detailed and summary) must be reported ***quarterly***. Expenditure reports must be submitted via email to ODCTE’s AEFL Financial Analyst.

**Project 319 state payments are made to sites at the end of each quarter based on their actual expenditures during each quarter. Failure to submit quarterly reports on time will result in your state payment being held until reporting requirements are fulfilled.**

**NOTE: Expenditure Summaries, Budget Analysis and Expenditure Analysis will no longer be accepted. Detailed and Summary Expenditure Quarterly Reports are required**.

## Classification of Budget Expenditures

As noted above, recipients must classify all proposed expenditures in one of two service categories: (a) instructional services or (b) administrative services. The following is excerpted from the Oklahoma Cost Accounting System Manual. Please review these definitions prior to completing the budget form. If the applicant is awarded funds, the applicant will be required to submit initial budgets for federal, state and local funds after allocations have been awarded.

## Expenditure Function Definitions

*1000 Instruction*: Instruction includes the activities dealing directly with the interaction between teachers and students. Teaching may be provided for students in a school classroom, in locations such as a home or hospital, and in other learning situations such as those involving co-curricular activities. It may also be provided through some other approved medium such as television, radio, telephone, correspondence, and other educational or assistive technology devices. Included here are the activities of teacher assistants of any type (clerks, graders, teaching machines, etc.) which assist in the instructional process. The activities of tutors, translators, and interpreters would be recorded here. Also, include department chairpersons who teach for any portion of time.

*2120 Guidance Services*: Those activities of counseling pupils and parents; providing consultation with other staff members on learning problems; assisting pupils in personal and social development; assessing the abilities of pupils; assisting pupils as they make their own educational and career plans and choices; providing referral assistance; and working with other staff members in planning and conducting guidance programs for pupils.

*2212 Instruction and Curriculum Development Services*: Activities designed to aid teachers in developing the curriculum, preparing and utilizing special curriculum materials, and understanding and appreciating the various techniques which stimulate and motivate students.

*2213 Instructional Staff Training Services*: Activities designed to contribute to the professional or occupational growth and competence of members of the instructional staff during the time of their service to the LEA or school. Among these activities are workshops, demonstrations, school visits, courses for college credit, sabbatical leaves, and travel leaves. Personnel with Function 1000 salaries would be coded here.

*2220 Library/Media Services*: Activities concerned with directing, managing, and supervising education media services, as well as such activities as selecting, acquiring, preparing, cataloging, and circulating books and other printed materials; planning for the use of the library by students, teachers, and other members of the instructional staff; and guiding individuals in their use of library books, reference guides and materials, catalog materials, special collections, and other materials, whether maintained separately or as a part of an instructional materials center.

*2240 Academic Student Assessment*: This function is inclusive of those services rendered for the academic assessment of the student.

*2330 State and Federal Relations Services*: Administration of Grant - Activities associated with developing and maintaining state and federal grants. Record administrative costs and data entry costs for LACES here.

*2560 Information Services*: Activities concerned with writing, editing, and other preparation necessary to disseminate educational and administrative information to students, staff, managers, and the general public through direct mailing, the various news media, or personal contact. Internal, public, and management information services would be included here, as well as personnel (staff) services.

*2580 Administrative Technology Services*: Activities concerned with supporting the school district’s information technology systems, including supporting administrative networks, maintaining administrative information systems, and processing data for administrative and managerial purposes.

*2620 Operation of Buildings Services*: Activities concerned with keeping the physical plant clean and ready for daily use. This would include operating the heating, lighting, and ventilation systems, and repairing and replacing facilities and equipment. Also included are the costs of supplies, utilities, telephones, postage, building rental, and property insurance.

*2660 Security Services*: Activities concerned with maintaining order and safety in school buildings, on the grounds, and in the vicinity of schools at all times. Included are police activities for school functions, traffic control on grounds and in the vicinity of schools, building alarm systems, and hall monitoring services.

*2670 Safety*: Activities concerned with maintaining a safe environment for students and staff, whether they are in transit to or from school, on campus or administrative facility, or participating in school-sponsored events. These include installing and monitoring school fire alarm systems and providing school crossing guards, as well as other costs incurred in an effort to ensure the basic safety of students and staff.

*2720 Vehicle Operation Services*: Activities involved in operating vehicles for student transportation from the time the vehicles leave the point of storage until the vehicles return to the point of storage. These include driving buses or other student transportation vehicles and costs of pupil transportation vehicle insurance. Expenditures for new buses would be coded here.

**NOTE: The use of object 2720 must be pre-approved by the ODCTE-AEFL Division.**

*5400 Indirect Cost:* Federal AEFLA is a supplement, not supplant grant subject to a restricted rate. Providers wishing to capture indirect administrative costs must have an annually negotiated indirect cost rate on file with their cognizant agencies. Providers may use the restricted eight percent rate or their approved rate, whichever is less. However, indirect cost is an administrative cost by nature and falls within the five percent cap on all administrative costs that may be charged against federal funds. Only for use with Object Code 970.

Indirect costs are incurred for a common or joint purpose benefitting more than one cost objective and include salaries and related benefits of individuals working in accounting, personnel, purchasing functions, rent, depreciation, and utilities used by office staff, equipment and services used by everyone: copiers, phone systems, janitorial service, IT support, Board expenses, marketing expenses, grants management, audit, liability insurance, staff training, etc.

NOTE: An indirect rate ensures that each Federal agency providing funding picks up its fair share of indirect costs.

## Object Code Definitions

Listed below are definitions of the object classes and examples of expenditures. The list of examples is a guide and are not to be considered exhaustive.

*100 Personnel Services – Salaries*: Amounts paid to EITHER\* permanent and temporary LEA employees, including personnel substituting for those in permanent positions. This includes gross salary for personal services rendered while on the payroll of the LEA. (avoid leave payouts for separated employees or court judgment costs)

*200 Personnel Services – Employee Benefits*: Amounts paid by the LEA on behalf of employees. These amounts are not included in the gross salary but are in addition to that amount. Such payments are fringe benefit payments, and while not paid directly to employees, nevertheless are part of the cost of personal service.

*300 Contracted Services*: Amounts paid for professional and technical services rendered by personnel who are not on the payroll of the LEA, and other services which the LEA may purchase. These services, by their nature, can be performed only by persons or firms with specialized skills and knowledge. While a product may or may not result from the transaction, the primary reason for the purchase is the service provided. Included are the services of architects, engineers, auditors, dentists, medical doctors, lawyers, consultants, teachers, or accountants. (310 – N/A for Federal Direct Charges (these costs are general administration); 320 – Professional Education Services, primarily Instructional. Student services only as allowed under AEFLA; 330 – N/A for Federal Direct Charges (site-wide expenses that do not support instruction); 340 – Can only be charged to federal award as it is related directly to instruction and not treated as direct charge for all costs centers not just this award; 350 – Not allowable for the federal award; 360- Instruction staff maybe direct charged to federal funds, grant administrative costs are subject to 5% admin cap)

Examples of disallowed items: background checks for teachers/school personnel.

*400 Purchased Property Services*: Services purchased to operate, repair, maintain, and rent property owned or used by the LEA. These services are performed by persons other than LEA employees. While a product may or may not result from the transaction, the primary reason for the purchase is the service provided. – Most of this area would not be directly charged to the federal award. Utilities, direct lease charges and maintenance may only be charged for the portion directly related to instruction and only if the LEA charges all cost centers for these expenses. Most are normally an indirect administrative cost.

Maintenance, repairs, and installation of equipment is considered an administrative expense. Exception: Installation of instructional equipment is an instructional expense. Example: installation of projectors. Leasing of computers for AEFL students is considered an instructional expense. Maintenance contract for copiers for AEFL student use only is considered an instructional expense.

*500 Other Purchased Services*: Amounts paid for services rendered by organizations or personnel not on the payroll of the LEA (separate from professional and technical services or property services). While a product may or may not result from the transaction, the primary reason for the purchase is the service provided. (520, 540, 560 or 570 should not be direct charged to the federal award)

* Advertising and Public Relations (Expenditures for announcements in professional publications, newspapers, or broadcasts over radio and television.) - Advertisements are allowable for recruiting grant personnel only. Advertisements are allowed to communicate with the public and press when the costs are considered necessary as part of the outreach effort for the grant. AEFLA funds cannot be used to promote the institution itself. Funds can be used for informational brochures, and magazine, newspaper, television, or radio advertisements —***only if***— it is directed toward a specific program/service.
* Postage and freight (postal communications services to establish or maintain postage machine rentals, postage, express delivery services, and couriers)
* Communication (telephone and voice communication services; data communication services to establish or maintain computer-based communications, networking, and internet services; video communications services to establish or maintain one-way or two-way video communications via satellite, cable, or other devices.
* Travel and Transportation - Travel and transportation costs for the LEA are an allowable expenditure if it will be of documentable benefit to the program and approved by ODCTE-AEFL Division. Travel may include the cost of attendance at state-approved, in-service training activities (professional development) to the extent that the recipient documents that such expenditures directly relate to the improvement of the program being assisted under the AEFLA.
* Local educational agencies (LEAs) are reimbursed in accordance with their internal travel regulations promulgated by the school board.

*599 Other Purchased Services*: Expenditures for the storage and delivery of commodities paid to the Department of Human Services would be included here. Example: Infrastructure and Shared Cost (administrative cost)

*600 Supplies*: Amounts paid for material items of an expendable nature that are consumed, worn out, or deteriorated by use; or items that lose their identity through fabrication or incorporation into different or more complex units or substances. (Use of 610, 640 and 650 for instruction and improvement of instruction are allowed against the federal funds—620, 630, 660, 670 and 680 would not be allowed.)

Examples:

* General Office Supplies (pens, pencils, paper, etc.)
* Copier Supplies (ink cartridges, toner, etc.)
* Computer Supplies (jump/flash drives)
* Educational Supplies (instructional materials, textbooks, etc.)

Examples of disallowed items:

* Hand sanitizer (exception will be made due to COVID-19)
* Wet wipes (exception will be made due to COVID-19)
* Lysol disinfectant spray (exception will be made due to COVID-19)
* Commencement items
* Reimbursement to site employees for supplies purchased

*700 Property*: Expenditures for the acquisition of fixed assets or additions to fixed assets. They are expenditures for land or existing buildings, improvement of grounds, construction of buildings, additions to buildings, remodeling of buildings, initial equipment, and replacement of equipment. (Only 730 would be allowed for AEFLA federal funds)

*800 Other Objects*: Amounts paid for goods and services not otherwise classified. **(810 and 860 only for AEFLA)**

*810 Dues and Fees*: Expenditures or assessments for district membership in professional or other organizations, payments to a paying agent for services rendered, late payment fees charged to a district or bank service charges. Example: bus passes for students (administrative cost)

*860 Staff Registration and Tuition*: Expenditures for registration and/or tuition necessary to attend or participate in professional conventions, seminars, and/or university classes

*970 Intrafund Transfers for Charging Assessed*: Indirect Cost as allowed through an annually approved Indirect Cost rate approved by the Local Program’s cognizant agency.

## Program Expenditure Dimension Definitions

*511 Adult Education & Family Literacy*: Instructional activities concerned with the fundamental tools of learning for adults who have never attended school or who have interrupted formal schooling and need this knowledge and these skills to raise their level of education to increase self-confidence and/or self-determination, to prepare for an occupation, and to function more responsibly as citizens in a democracy.

*519 Adult Education & Family Literacy*: Administrative cost incurred in implementation of the federal awards.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Adult Education and Family Literacy OCAS-CTIMS | | | | |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | **Project Codes:** | |  |  |  |  |  |  |  | **Object Codes:** | |  |  |  |
|  | Project 731 - Adult Education & Family Literacy | | | |  |  |  |  |  | 100-Salaries | |  |  |  |
|  | Project 732 - English Language/Civics | | | |  |  |  |  |  | 200-Benefits | |  |  |  |
|  | Project 733 - Adult Educ Services to Corrections | | | | |  |  |  |  | 300-Contracted Services | | |  |  |
|  | Project 319 - Adult Educ State and Local Matching Funds | | | | |  |  |  |  | 400-Purchased Property Services | | |  |  |
|  |  |  |  |  |  |  |  |  |  | 500-Other Purchased Services | | |  |  |
|  | **Program/Function** | |  |  |  |  |  |  |  | 599-Other Purchase Services (one-stop fee amts) | | | |  |
|  | **511-AEFL Implementation Function** | | | |  |  |  |  |  | 600-Supplies | |  |  |  |
|  | 1000-Instruction | |  |  |  |  |  |  |  | 700-Property | |  |  |  |
|  | 2120-Guidance Services | | |  |  |  |  |  |  | 810-Dues and Fees | |  |  |  |
|  | 2212-Instruction and Curriculum Development Services | | | | |  |  |  |  | 860-Staff Registration and Tuition | | |  |  |
|  | 2240-Academic Student Assessment | | | |  |  |  |  |  | 970-Intrafund Transfers | | |  |  |
|  | 2560-Information Services | | |  |  |  |  |  |  |  |  |  |  |  |
| **\*\*** | **519-AEFL Administrative Function** | | |  |  |  |  |  |  |  |  |  |  |  |
|  | 2213-Instructional Staff Training Services | | | |  |  |  |  |  |  |  |  |  |  |
|  | 2220-Library/Media Services | | |  |  |  |  |  |  |  |  |  |  |  |
|  | 2240-Academic Student Assessment | | | |  |  |  |  |  |  |  |  |  |  |
|  | 2330-State and Federal Relations Services | | | |  |  |  |  |  |  |  |  |  |  |
|  | 2560-Information Services | | |  |  |  |  |  |  |  |  |  |  |  |
|  | 2580-Administrative Technology Services | | | |  |  |  |  |  |  |  |  |  |  |
|  | 2620-Operation of Buildings Services | | | |  |  |  |  |  |  |  |  |  |  |
|  | 2660-Security Services | | |  |  |  |  |  |  |  |  |  |  |  |
|  | 2670-Safety | |  |  |  |  |  |  |  |  |  |  |  |  |
| **\*** | 2720-Vehicle Operation Services | | |  |  |  |  |  |  |  |  |  |  |  |
|  | 5400-Indirect Cost Federal Entitlement Programs | | | | |  | *\*\*\*Only for 970* | |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| \*For FY23 – If your Site plans to provide Transportation or other Supportive Services, it must be pre-approved. | | | | | | | | | | | | |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| \*\*The combined total of all categories in this area are limited to 5% of actual expenditures. | | | | | | | | |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| \*\*\*Locals may use lesser of our 8% restricted IDC rate or their approved, negotiated rate. All regulations regarding IDC must be strictly followed. | | | | | | | | | | | | | |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| NOTE: The above Oklahoma Cost Accounting System (OCAS) codes are possible funding categories. Sites are responsible for assuring allowability and allocability of goods and services charged based on the law and intended use of funds. Additionally, sites must make accurate determination between “Implementation” and “Administrative” expenditures. | | | | | | | | | | | | | | |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Full descriptions of the OCAS is available on the website for the Oklahoma State Department of Education. | | | | | | | | | |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Project 319 budget and Local budget is sent directly to AEFL division (CTIMS is not utilized). Send to ODCTE’s AEFL Financial Analyst. | | | | | | | | | | | | |  |  |

## AEFL Division Oklahoma Cost Accounting System

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **PROGRAM DESCRIPTION** |  | **REVENUE CODE** | | |  |  | **PROJECT REPORTING CODE** | |
|  |  |  | | |  |  |  | |
| Adult Education (AE), Title II, P.L. 105-220, Federal Funds\*  CFDA# 84.002 |  |  | 4611 |  |  |  |  | 731 |
| AE English Literacy/ Civics Federal Funds\*  CFDA# 84.002 |  |  | 4611 |  |  |  |  | 732 |
| AE Services to Corrections/Institutionalized Individuals\*  CFDA# 84.002 |  |  | 4611 |  |  |  |  | 733 |
| AE State and Local Matching Funds\*\* |  |  | 3430 |  |  |  |  | 319 |
| AE Revenue Collected from Student Fees\* |  |  | 1213 |  |  |  | District Assigns 001-298 | |
| AE Revenue Collected from Business and Industry for Classes\* | |  | 1215 |  |  |  | District Assigns 001-298 | |
| Tulsa Union EL/Civics Professional Development Contract | |  | 4611 |  |  |  | 734 | |
| Revenue Collected from HSE Testing Fees | |  | 1214 |  |  |  | District Assigns 001-298 | |

\* Expenditure reports must be submitted to the AEFL Division with requests for reimbursement of federal AE funds.

\*\* State assistance and local matching expenditures must be reported to the AEFL Division to ensure compliance with matching requirements.

## In-Kind

Recipients may also provide a quarterly [In-Kind Contribution Report](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/local-providers/forms). In-kind contributions are defined as the value of non-cash contributions (i.e. space, services or property) that—

1. Benefit a federally assisted project or program; and
2. Are contributed by non-Federal third parties, without charge, to a non-Federal entity under a Federal award

In-kind contributions are non-cash contributions provided by ***third parties*** to an organization. In-kind contributions may be in the form of real property, equipment, supplies, and services, and should directly benefit and be specifically identifiable to the project or program.

NOTE: Local expenditures and/or local in-kind must be allowable (see 5.0 Allowable Costs section). For example: ***In-kind contributions are not employees of the fiscal agents/local providers.***

*Exception: Classroom space (property) owned by the fiscal agent/local provider is an acceptable in-kind contribution.*

1. Need to be properly documented and verifiable from recipient records (recorded in the general ledger)
2. Must be necessary for accomplishing program objectives
3. Must be allowable according to cost principles and grant (AEFLA) provisions
4. Must not be included as contribution for other federally assisted programs
5. Need to have the value supported by appropriate documentation of fair market value

### Valuation of In-Kind Services

Fair market value = What would you pay if it had not been donated?

To demonstrate that an in-kind contribution has been “fairly evaluated,” the grantee needs to provide documentation that supports its value.

* e.g., Classroom space-must show actual cost for comparable space in the area, or a real estate appraisal, or cost of renting same space to other organizations
* e.g., Volunteer’s time-must show value of a paid teacher’s time in the same program

Special Considerations

* All expenditures identified as local match must be for the direct support of program activities.
* When applicable, documentation must be maintained and is required to identify the percentage of support converted to a dollar amount. Common instances of this requirement include salaries and utilities.
* Rent may be used as match and is based on the fair market rental rate in the program area. This applies when state, local school, community college, or other agency property is used as space to support program activities. Documentation of an appraisal of fair market rental rate for the area is required. The percentage of use-time must be converted to a dollar amount.
* Volunteer hours may be reported as match. To report such hours as match, the cash value of volunteer services per hour must be substantiated and that value reported as in-kind.

# PROGRAM INCOME

Program income is defined as “gross income earned by the non-Federal entity that is directly generated by a [grant] supported activity or earned as a result of the Federal [grant] award during the period of performance[.]” 2 C.F.R. § 200.80. Program income is governed by the terms of the agreement between the state and local subgrantee. Program income must be accounted for in program records and used only for costs allowable under the AEFLA. Program income may only be used to provide local adult education and literacy services. This may include the payment of salaries and purchase of materials.

In accordance with EDGAR at 2 C.F.R. § 200.307 and 34 C.F.R. § 76.534, tuition monies and/or fees collected by grant recipients must be used for classes, coordination, supervision, and general administration of full- and part-time adult education programs, including responsibilities associated with the management of the finances of these programs.

Grant recipients shall:

* Notify the AEFL Division that program income will be collected during the fiscal year (including the proposed amount to be charged to students);
* Provide an income waiver process to eligible students. Fees charged to students participating in an adult education program must be equitably administered and must not reach levels that have an adverse effect on the participation of economically disadvantaged students;
* Submit a [Program Income Form](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/local-providers/forms) to the AEFL Division quarterly of each year. A detail of all collections and expenditures by object code must be included with the certified form.
* Spend program income on allowable costs under AEFLA and in accordance with EDGAR (see below)
* Submit the completed form on a quarterly basis along with expenditure reports to the AEFL Division via email to ODCTE’s AEFL Financial Analyst.
* Retain documentation and receipts for program income expenditures; and
* Expend collected program income funds before submitting reimbursement requests for awarded fiscal year funds to AEFL Division.

## EDGAR Requirements for Spending Program Income

Unless prior written approval is received from the AEFL Division, institutions of higher education, technology centers, comprehensive schools and nonprofit research institutions must add program income to the federal award. *See* 2 C.F.R. § 200.307(e). For example, a recipient receives a subgrant in the amount of $30,000. The recipient receives program income in the amount of $5,000. The recipient may request reimbursement for $30,000 but is in effect running a $35,000 program and must expend the $5,000 of program income on allowable expenditures under the grant.

*Program income must be used for the purposes and under the conditions of the AEFL subgrant.*

Program income will be monitored by AEFL. Grant recipients not using program income in the appropriate and specified manner will receive written notification from AEFL and may be subjected to an on-site review and/or corrective actions as AEFL determines necessary.

**NOTE: Expenditure Summaries, Budget Analysis and Expenditure Analysis will no longer be accepted. Detailed and Summary Expenditure Quarterly Reports are required**.

# ALLOWABLE COSTS

Recipients may only spend grant funds on allowable costs. Recipients must perform an allowable cost analysis to determine whether a cost is allowable when developing the original budget and when actually expending grant funds. An allowable cost analysis must take into consideration the following:

1. Basic Cost Principles
2. Specific Items of Cost
3. Allowable costs under AEFLA
4. State policies
5. Supplement, not supplant

## Basic Cost Principles

Subpart E of 2 C.F.R. Part 200 establishes federal cost principles for all nonfederal entities. The cost principles are basic guidelines that describe permissible ways federal funds may be spent. The basic cost principles state that for a cost to be an allowable use of federal funds, it must be:

* **Necessary and Reasonable for the performance of the federal award.** A cost must be necessary for the proper and efficient performance of the grant. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision to incur the cost was made. For example, reasonable means that sound business practices were followed, and purchases were comparable to market prices.
* **Allocable to the federal award.** A cost is allocable to the federal award if the goods or services involved are chargeable or assignable to the federal award in accordance with the relative benefit received. This means that the federal grant program derived a benefit in proportion to the funds charged to the program. 2 C.F.R. § 200.405. For example, if 50% of a teacher’s salary is paid for by a specific federal grant, then that teacher must spend at least 50% of his or her time on that specific federal grant program.
* **Consistent with policies and procedures that apply uniformly to both federally financed and other activities of the subrecipient.**
* **Conform to any limitations or exclusions set forth as cost principles in Part 200 or in the terms and conditions of the federal award.**
* **Consistent treatment.** A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.
* **Adequately documented.** All expenditures must be properly documented.
* **Be determined in accordance with general accepted accounting principles (GAAP), unless provided otherwise in Part 200.**
* **Not included as a match or cost-share, unless the specific federal program authorizes federal costs to be treated as such.** Some federal program statutes require the nonfederal entity to contribute a certain amount of nonfederal resources to be eligible for the federal program.
* **Be the net of all applicable credits.** The term “applicable credits” refers to those receipts or reductions of expenditures that operate to offset or reduce expense items allocable to the federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the state relate to the federal award, they shall be credited to the federal award, either as a cost reduction or a cash refund, as appropriate. 2 C.F.R. § 200.406.

## Selected Items of Cost

The federal regulations provide cost principles specific to certain items. Once it is determined that a cost meets the requirements of the basic cost principles described above, recipients should consult the General Provisions for Selected Items of Cost found in 2 C.F.R. §§ 200.420-200.475. There are 55 selected items listed in Part 200. Just because an item is listed does not mean that the type of cost is always allowable. Under some instances the item may be allowable only under certain circumstances while under other instances the item may not be allowable. Recipients must review the specific cost principles associated with the type of cost being considered, as well as ensure the cost meets the basic cost principles described above.

## Allowable Under AEFLA

In addition to the cross-cutting cost requirements, recipients must ensure that the cost is allowable under the specific provisions of the grant statute.

## Allowable under State Policy

In certain circumstances, ODCTE-AEFL Division has more restrictive requirements than the federal rules. Recipients must also consider state policy when making allowability determinations and follow the more restrictive applicable requirements.

## Supplement, Not Supplant

As a requirement of the AEFLA statute, funds made available under the AEFLA must supplement and not supplant nonfederal funds expended to carry out adult education activities. In other words, federal AEFLA funds may only be used in addition to funds already spent by the ODCTE-AEFL Division on adult education and cannot be used in place of non-AEFLA funds.

It will be presumed that supplanting has occurred where:

* The local providers use AEFLA funds to provide services that the local provider is required to make available under another federal, state or local law; or
* The local providers use AEFLA funds to provide services that the local provider provided with non-AEFLA funds in the prior year.

These presumptions are rebuttable if the local provider can demonstrate that it would not have provided the services in question with non-AEFLA funds had the AEFLA funds not been available. If presumed supplanting occurred, due to a reduction in nonfederal funds or a change in the local provider’s priorities, the provider must create and maintain contemporaneous written documents, such as meeting minutes or itemized budget documents one year to the next, demonstrating that the decision to not fund an activity with state or local funds was made without regard to the availability of AEFLA funds. If a local provider uses AEFLA funds to support activities that otherwise would be funded with state or local funds, the activities funded must be allowable under the AEFLA.

# PROGRAM YEARS (PY) AND/OR FISCAL YEARS (FY)

Adult Education and Family Literacy Act (AEFLA) - Funded PY begins July 1 and ends June 30.

# TIMELY OBLIGATION OF FUNDS

All grant funds may only be spent on allowable expenditures during the period of performance. Accordingly, it is important for recipients to understand what the period of performance is for the grant awarded and when obligations occur. Each funding agreement received by recipients will specify the period of performance for the specific grant award. TIME AND EFFORT CERTIFICATIONS

All employees of recipients paid in whole or in part with grant funds are required to complete time and effort reports. [Time and effort reports](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/local-providers/forms) must accurately reflect the work performed and must meet the following standards:

* Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
* Be incorporated into the official records of the recipient;
* Reasonably reflect the total activity for which the employee is compensated by the recipient, not exceeding 100% of compensated activities;
* Encompass both federally assisted and all other activities compensated by the recipient on an integrated basis;
* Comply with established accounting policies and practices of the recipient;
* Support the distribution of the employee’s salary or wages among specific activities or cost objectives. 2 C.F.R. § 200.430(i).

It is critical for payroll charges to match the actual distribution of time recorded on the monthly certification documents. Budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to federal awards but may be used for interim accounting purposes provided that the system for establishing the estimates produces reasonable approximations of the activity performed.

If an employee spends time on adult education administrative and adult education instructional activities, that employee must track administrative time separately from instructional time. For audit purposes, the recipient’s Fiscal Agent must maintain the completed forms on file. Each employee’s Time and Effort form must include the following fields of information:

**Employee Time and Effort Certification**

Employee: Fiscal Year:

Pay Period Beginning: Position:

Pay Period Ending: Employer:

|  |  |  |
| --- | --- | --- |
| **Program/Activity Description** | **CFDA#** | **% of Effort** |
| Adult Education – Instructional (Federal) |  |  |
| Adult Education – Administration (Federal) |  |  |
| Adult Education – State | N/A |  |
| List Other Funding Sources | N/A |  |
| **Total Percentage (Must equal 100%)** |  |  |
|  |  |  |

I hereby certify that the information indicated on this form is true and correct, is an after-the-fact determination of actual effort expended for the period indicated, that the work assigned has been performed and that I have full knowledge of the work performed.

Employee Signature: Signature of Supervisor:

Printed Name: Printed Name:

Date: Date:

# 

# FAMILY LITERACY ACTIVITIES POLICY

Under Section 231 (d) of WIOA, SPECIAL RULE.—Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are not individuals described in subparagraphs (A) and (B) of section 203(4), except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

Local providers are required to provide a written proposal regarding how the following four components of the family literacy activities will be incorporated into an activity or program that is currently under development or has been developed.

1. Parent or family Adult Education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency;
2. Interactive literacy activities between parents or family members and their children;
3. Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children; and
4. Age-appropriate education to prepare children for success in school and life experiences.

# ASSESSMENT POLICY

Local Adult Education Programs will assess all enrolled students using the appropriate state-approved standardized assessment. Assessment data is required to report student educational gains for NRS reporting and for determining whether or not local programs meet the state’s negotiated performance targets for all NRS educational functioning levels. Assessment data also provides critical information needed to inform and support effective instruction. Assessment scores must be documented in pen and included in the student’s individual file. An assessment report should be printed and kept in the student file, also.

Please refer to the [Oklahoma Assessment Policy](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/local-providers/documents) for more information.

# PROFESSIONAL DEVELOPMENT HOURS

Full-time and part-time instructional personnel and program administrators must complete a minimum of 15 hours of professional development per program year. Classroom substitutes are excluded from this requirement.

One hundred percent of Local Program directors and full- and part-time teachers are required to attend an annual in-service meeting. Local Program directors are responsible for conducting this in-service meeting. Local Program directors must ensure that teaching staff understands and appropriately implements the state’s Assessment Policy, Goal-Setting Policy, enrollment forms and procedures, and any other program requirements. Programs must conduct this meeting with all staff prior to the last day of September. In-service attendance does not count as part of the annually required 15 hours of professional development. This is a state performance measure.

# STAFF QUALIFICATIONS

Teachers of adult education and literacy activities located in the adult learning centers shall have a valid Oklahoma Teacher’s Certificate or a minimum of a master’s Degree. Directors of adult education located in the adult learning centers shall have a valid Oklahoma Teacher’s Certificate or a minimum of a master’s Degree.

# LACES

## New LACES Personnel Training

Any new local Literacy and Adult Community Education System (LACES) personnel requesting access to LACES will be required to go through a training session with ODCTE’s LACES Data Specialist. When a new LACES user is hired, please contact ODCTE’s LACES Data Specialist to schedule a training as soon as possible.

## Access, Yearly Updates, & Revoking Access

Any local program personnel requesting access to LACES will be required to fill out a LACES access form (found on the forms section of AEFL website) and email completed form to ODCTE’s LACES Data Specialist. It will be reviewed by state staff and an approval decision will be communicated through email.

The purpose of this is to ensure data security. While ODCTE’s AEFL department wants programs to have and use data in their decision-making process, student data security is of the utmost importance.

All programs must fill out the Yearly Update form to ensure better quality control of who is using LACES.  This form is required for all programs, and must list all users of LACES per program, and their roles.

AEFL State Staff reserve the right to revoke any user’s LACES access.  This would include anything from improper use of LACES, security issues, and lack of use of LACES.  LACES accounts are active for 60 days without use.  If an account must be re-activated because of inactivation more than two times in a fiscal year, AEFL State Staff will remove the user from having LACES access to better ensure more efficient use of the MIS system.

## Removing a User

Any local LACES user who leaves the local organization for any reason must have their LACES access removed as soon as possible. This is the responsibility of the local program and local program director to notify ODCTE’s LACES data specialist. The purpose of this is to ensure data security and integrity of local program’s records.

# DISTANCE LEARNING POLICY

## Definition of Distance Education

Distance education is a formal learning activity where students and instructors are separated by geography, time, or both, for the majority of the instructional period. Distance learning materials are delivered through a variety of media including, but not limited to print, videotapes, DVDs, audio recordings, broadcasts, computer software, and Web-based programs and other online technology. Teachers support distance learners through communication via mail, telephone, e-mail, online technologies and software, or face-to-face instruction.

## Definition of Distance Learners

Distance learners are students who receive distance education services as defined above. It is not uncommon for adult learners to receive both distance education and traditional classroom education during the course of the program year. A student’s hours in both distance learning and traditional classroom programs will be reported in Oklahoma’s management information system, LACES. A student will be reported as a distance learner for federal reporting purposes if he/she received 51% or more of his/her instruction at a distance (proxy hours). This determination will be made at the end of the program year.

## Measuring Contact Hours for Learners in Distance Education

The U.S. Department of Education, Office of Vocational and Adult Education, requires students in distance education to have at least 12 hours of direct contact with the adult education program before they can be counted as a fundable student in the National Reporting System (NRS). Direct contact hours involve interaction between the learner and program staff in real time where the identity of the learner can be verified. Direct contact hours may include face-to-face orientation, pre-assessment, post-assessment, goal setting, and instruction. In addition, direct contact hours may include contact through telephone, video, teleconference, or online communication. Live online discussions, telephone conference calls, and live video broadcast to remote locations are examples of direct contact hours that are countable under this definition.

## Proxy Contact Hours

In addition to direct contact hours, adult education programs must report proxy contact hours to track the time students spend on distance learning activities. Proxy contact hours must be associated with one of the three approved distance learning models of instruction.

1. The ***Clock Time Model*** assigns contact hours based on time that a learner is engaged in a software program that tracks time.
2. The ***Teacher Judgment Model*** assigns a fixed number of hours based on teacher determination of the extent to which a learner engaged in, or completed, the assignment.
3. The ***Learner Mastery Model*** assigns a fixed number of hours based on the learner passing a test on the content of the lesson.

The model used in Oklahoma will vary depending on the curricula used. Currently, all state-approved DL curricula are web-based and use the ***Clock Time Model*** to assign proxy hours. The online programs track the time the student works in the program from logging in to logging out. Distance learning teachers will also maintain a record of student clock hours.

Proxy and direct contact hours will be recorded separately in LACES. This will determine whether the student will be reported as a distance student (51% or more hours of instruction via distance) or as a traditional classroom learner. Students who have received some distance instruction (50% or less of their total instructional hours) may not be reported as a distance learning student but may be counted as a traditional student as long as the student has twelve contact hours.

## Assessing Distance Learners

Oklahoma’s Adult Education and Literacy Assessment Policy will apply to all adult education students – distance and non-distance. Assessments will be conducted in a secure, in-person, proctored setting.

## NRS Reporting of Students in Distance Learning

Distance learner data will be reported on NRS Table 4C and Table 5A. Proxy contact hours and actual contact hours for distance learning students will be reported on NRS Table 4C. Core follow-up outcome measures for distance learning students will be reported on NRS Table 5A. Data entry personnel for distance learning programs must enter data for distance learning students on a monthly basis.

## Funding for Distance Learning

Additional funding will not be available to programs approved to offer a distance learning program. Programs must be willing to incur any increased costs associated with distance learning. Hopefully any increase in costs will be offset by an increase in students served.

## Student Use/Checkout of Technology for Distance Learning

ODCTE AEFL will allow the purchase of tablets/computers/laptops for the purpose of distance learning during the current COVID-19 pandemic. We will allow the purchase or subscription usage of hotspots/MiFi’s. Your organization must have a local technology policy in place that addresses the following: possible deposit for usage, loan of the device/checkout policy, how the subscriptions will be tied to attendance, parental controls/blockage of certain content, firewalls, type of training, damage or lost device, maintenance agreement and misuse of equipment.

Your program’s written policy on how the technology will be used and what will be purchased before the order is placed. Please submit policy to your AEFL Specialist for approval.

This technology or subscription will be coded to 1000/600/511 as supplies for instruction. List in your CTIMS budget what you are purchasing specifically for COVID-19 in your CTIMS worksheet.

# GOAL SETTING POLICY

1. It is recommended that local Adult Education Programs ensure that each learner has the opportunity to set appropriate goals for his/her educational instruction in Adult Education and English as a Second Language.
2. The initial goal-setting process should take place within the first 12 hours of instruction or during the program’s intake or orientation process. This will ensure that Local Adult Education Programs are learner-centered, and that learner’s goals provide direction for instruction.
3. Check learner’s goals for progress, review, and/or revise, as needed.
4. [OK Career Guide](https://okcareerguide.kuder.com/landing-page) or some equivalent career development tool is recommended to help students ascertain their career interests, skills, and values. This information can be recorded and kept in students’ files.

1. Adult Education staff is responsible for facilitating the goal-setting process with all of their learners and using information gathered from this process to direct instruction.

# REQUIRED PROGRAMMATIC FORMS

All programs are required to complete and send in the following [programmatic forms](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/local-providers/forms) by the end of the first quarter of each new fiscal year:

* AEFL Class Schedule
* Program Action Plan
* Comprehensive Inventory

# NEGOTIATIONS REQUEST

## Administrative Cost – Special Rule Justification Form

## Click in shaded areas below to type:

**Program Name:**

**Director Name:**

**Total Administrative Percentage Requested**:

In accordance with the Workforce Innovation and Opportunities Act (WIOA) of 2014, Section 233: LOCAL ADMINISTRATIVE COST LIMITS (a-b):

(a) *In General*.-- Subject to subsection (b), of the amount that is made available under this subtitle to an eligible provider –

(1) not less than 95 percent shall be expended for carrying out adult education and literacy activities; and

(2) the remaining amount, not to exceed five percent, shall be used for planning, administration, personnel development, and interagency coordination.

(b) *Special Rule*. -- In cases where the cost limits described in subsection (a) are too restrictive to allow for adequate planning, administration, personnel development, and interagency coordination, the eligible provider shall negotiate with the eligible sub-recipient in order to determine an adequate level of funds to be used for noninstructional purposes.

**INSTRUCTIONS TO INITIATE THE NEGOTIATIONS PROCESS**

Complete and return the Special Rule Justification Form with your grant application.

**NOTE*:*** *It is at the discretion of the Oklahoma Department of Career and Technology Education to determine the appropriate administrative cost percentage on a case-by-case basis.*

**JUSTIFICATION**

In the shaded space below, provide a written narrative to justify this request for administrative costs greater than 5% of the grant award amount. Include specific references to explain each of the following:

* why an amount greater than 5% is requested; and,
* in what ways your agency will be hindered in accomplishing the project goals and objectives if only 5% administrative costs are allowed in the grant.

**Click in shaded area below to type:**

ALC Director Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

ALC Financial Officer Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**For ODCTE use only: Approved**  **Denied**

**Administrative Cost Percentage (%) Approved:**

**Adult Education Division**

Executive Director Review: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Adult Education Family Literacy Specialist Review: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# [COMMONLY USED FORMS](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/local-providers/forms)

Please refer to the ODCTE website for [commonly used forms](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/local-providers/forms).

## Financial-Related Forms

**Estimated Year-End Projection-Template**

This form is available on the AEFL Division’s form webpage. Local providers should submit an Estimated Year-End Projection of their invoices/claims if they elect to invoice above their approved administrative rate. The Estimated Year-End Projection-Template should be completed and sent via email to ODCTE’s AEFL Financial Analyst.

**Local In-Kind Contribution Report**

This form is available on the AEFL Division’s form webpage. Local providers should submit a quarterly Local In-Kind Contribution Report, a Local Expenditure Report or a combination of the two. The Local In-Kind Contribution Report should be sent via email to ODCTE’

**Application to Collect Program Income**

This form is available on the AEFL Division’s form webpage. The Application to Collect Program Income must be submitted to the AEFL Division. Local providers ***must be approved*** to collect program income.

**Program Income Report**

This form is available on the AEFL Division’s form webpage. The Program Income Report is a ***required*** quarterly submission.

**Time and Effort Report**

This form is available on the AEFL Division’s form webpage. Any employee that is paid in whole or in part with grant funds are required to complete time and effort reports. Recipients are not required to use this specific form.

**Budget Worksheet**

The budget worksheet is available on the AEFL Division’s webpage. Local providers are required to submit a local budget and a state budget using the budget worksheet. The budget worksheets should be sent via email to ODCTE’S AEFL Financial Analyst.

Federal budgets must be entered into CTIMS no later than **September 15**. State and local budget worksheets are also due **September 15**.

## Programmatic Forms

**AEFL Class Schedule**

**Comprehensive Inventory**

**Professional Development Plan Form**

## Student Documents

**Enrollment AEFL**

**Enrollment ESL**

**Release Form for 16- and 17-Year Old Students**

**Conduct Form**

**Student Goals Form**

**\*All student forms must be in individual student folders in a secure location (recommended behind two locked doors).**

# PERFORMANCE STANDARDS AND ACCOUNTABILITY

Below are the performance targets that all programs must meet.  If a program falls below either of these targets, ODCTE will require a program action plan from the program.  Furthermore, a monitoring visit and other trainings and technical assistance visits may be required.

If a program is having an issue meeting these targets, it is incumbent on them to ask for assistance, training, support, or other technical assistance from ODCTE, other AEFL programs, or other sources.

* Pre / Post Test – 60% of students with 12+ hours and a pre-test must be given at least one post assessment which has been entered into LACES

* Measurable Skill Gains (MSGs) – 41% of students with 12+ hours and a pre-test must achieve either an Educational Functional Level (EFL) gain, attain an HSE diploma, enter employment, or enter a postsecondary program or institution.

# FREQUENTLY ASKED QUESTIONS (FAQs)

## Can funds be used for travel expenses to a professional development activity?

The cost of travel expenses to a professional development activity is allowable as long as the professional development is state-approved, benefits the federal program, the costs are necessary and reasonable, and the costs are allowable under State-specific travel policies.

## Can funds be used to pay for campus security guards?

The cost for campus security guards is not an allowable cost.  In a recent audit report, the Department of Education said that the cost of security for a building would exist absent the federal funds, accordingly, such a use of funds would violate the supplanting provision. ***There are some exceptions to this for our providers. Please call the AEFL Division for clarification.***

## Can funds be used for a graduation ceremony?

No. In addition to causing supplanting concerns for all types of recipients, the costs related to commencement and convocation are specifically prohibited for institutions of higher education under the regulations. *See* 2 C.F.R. § 200.429.

## Can funds be used for advertising?

Advertisements are allowable for recruiting grant personnel only as long as the advertisement is not in color and not excessively large. Advertisements are allowed to communicate with the public and press when the costs are considered necessary as part of the outreach effort for the grant. AEFLA funds cannot be used to promote the institution or organization itself. Funds can be used for informational brochures, and magazine, newspaper, television, or radio advertisements —***only if***— it is directed toward a specific program/service. *See* 2 C.F.R. § 200.421.

## Can Federal and State grant funds be used for High School Equivalency (HSE) Testing?

No. It is a long-standing policy of OCTAE that AEFLA funds cannot be used for the administration of HSE testing. Furthermore, the administration of HSE testing is not an allowable educational service or form of instruction under the provisions of the federal or state grant.

## Can Project 319 funds (state funds) be carried forward to the next fiscal year?

No. Project 319 funds must be expended in the fiscal year awarded. Unspent state funds at the end of the fiscal year will be returned to the ODCTE AEFL Division.

# COVID-19 RESOURCES

Below are some resources to assist during the transition to online learning:

* [AEFL Online Education Reference Guide from COAEFL](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/covid-19-resources-for-educators/ABEOnlineEdReferenceGuide.pdf)
* [Resources for Transitioning to Online Learning](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/covid-19-resources-for-educators/copy_of_ResourcesforTransitioningtoOnlineLearning.pdf)
* [Learner Persistence in an Online or Blended Learning Environment](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/covid-19-resources-for-educators/copy_of_LearnerPersistenceOnlineLearnerEnvironment2018508.pdf)
* [Designing Engaging Online/Blended Courses](https://www.okcareertech.org/about/state-agency/divisions/adult-basic-education/covid-19-resources-for-educators/DesigningEngagingOnlineBlendedCourses2019508.pdf)
* [Tips for Distance Learning](https://edtech.worlded.org/tips-for-distance-learning/)

# CERTIFICATIONS AND ASSURANCES

1. As a requirement of the AEFLA statute, funds made available under the AEFLA must supplement and not supplant nonfederal funds expended to carry out adult education activities.

It will be presumed that supplanting has occurred where:

* The local providers use AEFLA funds to provide services that the local provider is required to make available under another federal, state or local law; or
* The local providers use AEFLA funds to provide services that the local provider provided with non-AEFLA funds in the prior year.

These presumptions are rebuttable if the local provider can demonstrate that it would not have provided the services in question with non-AEFLA funds had the AEFLA funds not been available. If presumed supplanting occurred, due to a reduction in nonfederal funds or a change in the local provider’s priorities, the provider must create and maintain contemporaneous written documents, such as meeting minutes or itemized budget documents for one year to the next, demonstrating that the decision to not fund an activity with state or local funds was made without regard to the availability of AEFLA funds. If a local provider uses AEFLA funds to support activities that otherwise would be funded with state or local funds, the activities funded must be allowable under the AEFLA.

1. All expenditures will be made in accordance with the provisions of the AEFLA, Federal Regulations and Guidance, and the policies and procedures of the Oklahoma Department of Career Technology and Education (ODCTE). All programs will follow the Oklahoma Cost Accounting System (OCAS) procedures for budgeting and recording of all program related expenditures.
2. Programs must follow FERPA.
3. Entities must have an active DUNS number registered and maintained annually with Dun and Bradstreet in order to be eligible to receive a sub award for AEFLA funds. Additionally, sub-recipients are subject to Federal Funding Accountability and Transparency Act (FFATA) reporting requirements. The ODCTE reports federal allocations via the FFATA Subaward Reporting System (FSRS).
4. Approved local programs will be conducted in a manner consistent with the laws and regulations pertaining to AEFLA, the Oklahoma State Plan for Adult Education and Literacy, and state policies and regulations and laws.
5. Activities provided under AEFLA are coordinated with and not duplicative of programs, services, or activities made available to adults under various other programs.
6. ODCTE requires that records are maintained for five years in addition to the current fiscal year. After which, program records, including sensitive personal information, may be destroyed. Record of maintenance may vary within different organizations. Some organizations may require additional years of recording keeping.
7. Local Programs must have a system in accordance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act to ensure that its services are accessible and barrier-free and that no adult, by reason of a disability, is excluded from participation or denied the benefits of the program. Local Programs must have a system for having appropriate instructional materials and screening/assessment instruments available or readily accessible to adults with disabilities.
8. Local Programs will develop and/or strengthen coordination with elementary and secondary schools, postsecondary education institutions, Oklahoma Works, job training programs, and social service agencies.
9. Local Programs should submit requests for reimbursement and other related financial reports, not more than monthly, but at least quarterly. Final expenditures for fiscal year closeout must be claimed by August 1st.
10. Local Programs will submit quarterly and end-of-year reports as required by the U.S. Department of Education and ODCTE.
11. Local Programs will use an ODCTE-approved Management Information System (MIS) to document student enrollment, goals and attendance, educational gains, and other information required for the National Reporting System (NRS). The Local Program will update NRS data monthly.
12. AEFLA subawards to Local Programs are restricted to a five percent cap on administrative costs that can be charged to the federal dollars; however, Local Programs may negotiate with ODCTE for a higher administrative cost cap. During negotiations, ODCTE may consider the Local Program’s measurable skill gain (MSG), allocation amount, and Period of Performance (POP). NRS data entry is considered an administrative cost per federal regulations. If data entry is directly charged to the award, OCAS guidelines state it must be charged against Function Code 2330. Administrative costs include both directly charged expenses and indirect costs.
13. ODCTE states that their State ceiling may not allow more than ten percent of the federal funds awarded to ODCTE may be expended on providing educational services to individuals in correctional facilities or for other institutionalized individuals. ODCTE will allocate ten percent of the federal funds available for allocation directly to the Oklahoma Department of Corrections. All other services to these populations will be restricted to Local Programs who receive special allocations, which Local Programs must apply for separately from the regular Adult Education federal funds. Local Programs receiving Corrections Subawards, shall give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Local Programs wishing to spend additional money on corrections education may spend up to five percent of their state funds.
14. Local Programs will maintain on file class sign-in sheets, student enrollment forms, and student contact hours on the prescribed Monthly Class Attendance Form. All student files should be kept secure in one central filing system located in the main office of the adult education program.
15. Payments and Reimbursements to Local Programs will be based on allowable costs per 2 CFR part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as adopted at 2 CFR part 3474. Payments will not be made until ODCTE is in receipt of detailed, computer-generated OCAS expenditure reports in the Career Tech Information Management System (CTIMS). Community-based organizations must submit expenditures in CTIMS.
16. ODCTE encourages Local Adult Education programs to provide year-round Adult Education and Literacy services and a well-trained staff to conduct such services from July 1 through June 30 of each fiscal year.
17. ODCTE is committed to high standards of performance. Local Programs are required to submit a Program Action Plan for Quality Adult Education annually as part of the grant extension application.
18. ODCTE negotiates performance levels for each of the Federal Core Indicators of Performance with the U.S. Department of Education every fiscal year. Local Programs will be expected to meet or exceed the state’s negotiated performance levels for the Federal Core Indicators of Performance for the fiscal year.
19. Local Programs will meet the state performance measure of pre and post assessing 60% of their students.
20. Local Programs will meet the state performance measure of increasing the average number of contact hours from the previous program year.
21. ODCTE requires 100% of Local Program directors and full- and part-time teachers will annually complete a minimum of 15 hours of Adult Education Family Literacy approved professional development training. This is a state performance measure.

1. One hundred percent of Local Program directors and full- and part-time teachers are required to attend an annual in-service meeting. Local Program directors are responsible for conducting this in-service meeting. Local Program directors must ensure that teaching staff understands and appropriately implements the state’s Assessment Policy, Goal-Setting Policy, enrollment procedures, and any other program requirements. Programs must conduct this meeting prior to the last day of September. In-service attendance does not count as part of the annually required 15 hours of professional development. This is a state performance measure.
2. Local Programs will assess adult learners in accordance with ODCTE’s Assessment Policy for Adult Education.
3. All Adult Education and Literacy teachers must have a valid up-to-date Oklahoma Teacher’s Certificate or a master’s degree. Adult Education Directors must have a valid up-to-date Oklahoma Teacher’s Certificate or a graduate degree.
4. Initial budgets, quarterly reports, end-of-year reports, and other required reports must be submitted to ODCTE by the required due dates. Claims for reimbursement will not be processed until ODCTE receives all past due report(s).
5. Local Program directors will conduct formal individual teacher observations and evaluations at a minimum of twice a year. Refer to the Oklahoma Quality Program Action Plan for specific areas to be addressed in teacher evaluations. In addition to formal teacher evaluations, directors will informally monitor and document visits to all classes to ensure program quality and accountability.
6. Local Programs will maintain an ongoing written inventory of all instructional materials and equipment purchased with adult education funds. The written inventory must include the item, quantity, serial number, or ID number as applicable, acquisition cost, and the date purchased. Separate inventories will be required for each Sub award type (AEFL, EL/Civics, Corrections, etc.)
7. Local Programs shall collaborate with other agencies and community resources to obtain student referrals and assist students with counseling, employment, postsecondary education/training, learning or physical disabilities, and other support services.
8. Local Programs must have a system in compliance with the Americans with Disabilities Act of 1990; the Rehabilitation Act, Sections 504 & 508 of 1973; the Workforce Innovation and Opportunity Act (WIOA of 2014, Section 188, Part 37 of Title 29); the Civil Rights Act of 1964; the Individuals with Disabilities Education Act of 1990; and applicable Oklahoma State laws and statutes. Programs must ensure that its services are accessible and barrier-free and that no individual, by reason of a disability, is excluded from participation or denied the benefits of the program. Local Programs must have a system for having appropriate instructional materials and screening/assessment instruments available or readily accessible to adults with disabilities to ensure equal access for all.
9. ODCTE requires that local programs must provide a 25% match to the total amount of federal funds received each fiscal year. ODCTE states that the match may include direct expenditures paid from local funds and/or in-kind contributions.
10. Local Programs that close will repay state funds that have not been expended. In addition, adult education inventory items will be transferred to new or existing grantees.
11. Local Programs shall make every effort to provide free classes to students. Local Programs may charge necessary and reasonable fees for consumable materials and work-based classes. Adult Education programs that wish to implement fees must develop a fee policy that has been approved by the Adult Learning Center’s governing board. The fee policy must be reasonable and may not restrict access to services.
12. Local Programs may generate income. The purpose of the income is not to make a profit, but rather to expand services. Income and donations received must be reinvested in the adult education program. Any income must be accounted for in records and reported to the Adult Education Family Literacy Division for National Reporting System Financial Reports.

# CONTACT INFORMATION

|  |  |  |  |
| --- | --- | --- | --- |
| **NAME** | **TITLE** | **E-MAIL ADDRESS** | **PHONE** |
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| Sharon Baker | AEFL Specialist – Eastern Region and ESL Coordinator | [sharon.baker@careertech.ok.gov](file:///\\agency.ok.local\data\320_I\Dept\ABE\Grant%20Handbooks\FY22\sharon.baker@careertech.ok.gov) | (405)564-3756 |
| Lana Knott | AEFL Financial Analyst | [lana.knott@careertech.ok.gov](file:///\\agency.ok.local\data\320_I\Dept\ABE\Grant%20Handbooks\FY22\lana.knott@careertech.ok.gov) | (405)743-5570 |
| Caleb Cummings | AEFL Coordinator – LACES | [caleb.cummings@careertech.ok.gov](file:///\\agency.ok.local\data\320_I\Dept\ABE\Grant%20Handbooks\FY22\caleb.cummings@careertech.ok.gov) | (405)714-5835 |
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| **CENTRAL/WESTERN REGION** | **NORTHEAST/SOUTHEAST REGION** | **DEPARTMENT OF CORRECTIONS** | |
| Caddo Kiowa Technology Center | Ada Public Schools | Bill Johnson CC - Alva | |
| Canadian Valley Technology Center | Ardmore Family Literacy | Dick Conner CC - Hominy | |
| Chickasha Public Schools | Bartlesville Public Schools | Eddie Warrior CC- Taft | |
| Chisholm Trail Technology Center | Central Technology Center | Howard McLeod CC - Atoka | |
| Enid Public Schools | Idabel Public Schools | Jackie Brannon CC - McAlester | |
| Great Plains Technology Center | McAlester Public Schools | James Crabtree CC - Helena | |
| Meridian Technology Center | Northeastern Oklahoma A & M | James E. Hamilton CC - Hodgen | |
| Metro Technology Center | OSU IT - Okmulgee | Jess Dunn CC - Taft | |
| Oklahoma City Community College | Poteau Public Schools | John Lilley CC - Boley | |
| OIC | Sallisaw Public Schools | Joseph Harp CC - Lexington | |
| Pioneer Technology Center | Southern Technology Center | Lexington A & R Center - Lexington | |
| Red River Technology Center | Tahlequah Public Schools | Mabel Bassett CC - McLoud | |
| Shawnee Public Schools | Union Public Schools | Mack Alford CC - Stringtown | |
| Southwest Technology Center | YWCA Tulsa | Northeast OK CC - Vinita | |
| Western Technology Center |  | OK State Penitentiary - McAlester | |
| Woodward Public Schools |  |  | |
|  |  | OK State Reformatory - Granite | |
| OK Community Corrections - Statewide | |
| Women in Recovery | |
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