###

FY24-FY28 Massachusetts

Policies for Effective

Adult Education

in

Community Adult Learning Centers (CALCs)

and

Correctional Institutions (AECIs)

****

**[Adult and Community Learning Services](https://www.doe.mass.edu/acls)**

**[Department of Elementary and Secondary Education (DESE)](https://www.doe.mass.edu/acls)**

**75 Pleasant Street**

**Malden, MA 02148-4906**

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## Overview

[Public adult education of MA of MA](https://publicadulteducationma.org/) (PAE) is here to support enterprising adults looking to improve their lives through learning. For those striving for a better future, public adult education of MA is the bridge between living and learning. Our programs provide students without high school degrees or with limited English proficiency with the skills, support, and credentials they need to further their education, seize opportunities, and build the lives they want to lead. As the steward of the public adult education system, [Adult and Community Learning Services](https://www.doe.mass.edu/acls/)[[1]](#footnote-2) (ACLS) works to build partnerships, set professional standards, and direct state and federal funding, all to ensure that every adult who wants a great foundational education can get one.

Our programs help students overcome systemic barriers and open access to college education, vocational careers, and higher earnings.

### Vision

*We envision a future where every adult in Massachusetts can gain the knowledge, skills, and support they need to build the life they aspire to live.*

Adopted 2023

### Mission

*Working with providers and partners, ACLS stewards a public adult education system that puts no-cost quality instruction, advising, job training, and career pathways within reach of all adult students in Massachusetts.*

 Adopted 2023

### Core Principles

* **Learners first:** Our public adult education system is defined by the grit and determination of the adult students we serve. The programs and services are important, but it’s the learners who are our driving purpose – and we measure our success through theirs.
* **More than a job:** For us, public adult education is more than just career development. It’s an opportunity for adult learners to develop interpersonal skills, build confidence, and make the most of their life experience; paving a path for them to make a difference for themselves, their families, and their community.
* **For the real world:** We know that adult learners lead complex lives. That’s why our public adult education system needs to be the bridge between living and learning. Designed for the real world, our no-cost programs and individualized services provide adults with the flexibility and support they need to succeed.
* **Working together:** We cannot achieve our vision alone. Together with our partners, providers, and students, we comprise a public adult education system that works to address needs, opens doors, and strengthens cross-cultural relationships – making sure no adult who wants to learn gets left behind.
* **Driven by equity:** Equity is at the heart of everything we do. We understand that many adults face barriers to opportunity and that, as a student-centered public adult education system, we are in a unique position to do our share to bring about positive change. To do that, we are building a network of partners and providers that truly represents the communities we serve.
* **Our role is essential:** ACLS is the voice of the public adult education system in Massachusetts. Besides setting professional standards and providing funding, we are here to promote public adult education as a catalyst for individual achievement, social justice, and equitable economic development. Our role is essential not just because of what we do, but for what we stand for.

ACLS administers state and federally-funded Adult Education and Family Literacy Act (AEFLA) grants to Community Adult Learning Centers (CALCs) and Correctional Institutions (AECIs) consistent with federal [Public Law 113-128](https://www.congress.gov/113/plaws/publ128/PLAW-113publ128.pdf) (WIOA), Sections 201 through 243, across 16 local workforce development areas in Massachusetts.

For more information on AEFLA and WIOA see [Workforce Innovation and Opportunity Act | U.S. Department of Labor (dol.gov)](https://www.dol.gov/agencies/eta/WIOA) and [The Workforce Innovation and Opportunity Act (WIOA) - Adult and Community Learning Services (ACLS) (mass.edu).](https://www.doe.mass.edu/acls/wioa.html)

## Chapter 1: Indicator 1: Program Design

ACLS supports outcome-driven program design and delivery that is inspired by new ideas about teaching and learning and guided by research and evidence-based practices with the goal of advancing significant achievement and growth among students.

### In-person Services (State Requirement)

ACLS requires that all programs provide some in-person instruction.

### Enrollment (State Requirement)

CALC and AECI awards are based on monthly enrollment targets applicable for the period from September to June. In order to maintain funded enrollment levels, programs must retain students or enroll new ones as students leave. These ACLS targets from September to June[[2]](#footnote-3) are used as a component when evaluating funding and performance. Grant awards may be reduced when enrollment patterns are below target over a period of time.

[National Reporting System](https://nrsweb.org/) ([NRS](https://nrsweb.org/)) participants who attend at least one hour in a month count towards monthly enrollment targets. Students are considered [NRS](https://nrsweb.org/) participants when their [LACES](https://www.doe.mass.edu/acls/laces/default.html)[[3]](#footnote-4) records have all the required intake information including barriers to employment, a valid [NRS](https://nrsweb.org/) assessment, and twelve hours of instruction within a period of participation.

Programs are funded to enroll and retain a specific number of students based on their grant awards (e.g., 50 ABE seats and 100 ESOL seats). A program that discovers a need to decrease the number of funded enrollments is required to submit a written request to the state administrator. (Note: Decreasing the total number of funded enrollments may impact funding.)

If a program uses match to fund one or more classes, the number of enrollments the program is required to maintain will be the sum of seats in the ACLS funded classes and the seats in the match funded classes. For example, if ACLS funds 50 seats and match funds another 50 seats, the program will need to enroll and maintain 100 enrolled students during the period from September to June.

For more information on the [NRS](https://nrsweb.org/) and [LACES](https://laces.literacypro.com/laces/), see [Homepage | NRSW](https://nrsweb.org/) and [LACES Massachusetts Customizations - MA LACES User Manual (google.com)](https://sites.google.com/a/literacypro.com/laces-massachusetts-customizations/ma-laces-manual). For more information on match funding, see Chapter 10.

### Continuum of Instructional Services (State Requirement)

ACLS requires that a full continuum of instructional services be available to students. A program that chooses to offer services that move students through the continuum internally is required to offer services that span the six Educational Functioning Levels (EFL) for ABE and the six EFL for ESOL. (Note: Programs can use ACLS and non-ACLS funds to fulfill this requirement.)

Programs that do not fulfill this requirement internally are required to have a Memorandum of Agreement (MOA) with partners that complete the continuum and submit it annually with their continuation applications. The MOA is a written document describing the agreement between a grantee and a partner working together to deliver services. It formalizes and clarifies the expectations of the grantee and the partner. This requirement is applicable whether the external partner is a subgrantee or a partnering program.

For more information on EFL, see [Homepage | NRSWeb](https://nrsweb.org/). For more information on MOA, see Appendix A.

### Intensity and Duration (State Requirement)

ACLS requires that programs design services of sufficient intensity and duration for students to progress[[4]](#footnote-5) along the continuum of instructional services. Programs have the option of increasing intensity using program design features including, but not limited to, enrollment in multiple classes, blended learning, tutoring, and co-enrollment in more than one AE program.

### No Charges to Students (State Requirement)

Adult education programs must ensure that enrolled students are not charged tuition, fees, or any other charges or required to purchase books or materials needed for participation.

### Program Delivery Options

Programs are encouraged to incorporate a variety of class designs which meet the needs of learners in their program area including in-person face-to-face, distance education, and hybrid options.

#### Face-to-Face (F2F) Education

In-person F2F instruction refers to face-to-face instruction delivered in a physical classroom.

#### Distance Education (DE)

Distance education[[5]](#footnote-6) is defined by the [NRS](https://nrsweb.org/) as: 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, audio recording, videotape, broadcasts, computer software, Web-based programs, and other online technology. Teachers support and communicate with distance learners via mail, telephone, e-mail, or online technologies and software.[[6]](#footnote-7)

A DE participant receives all or a majority of instruction through distance methods. When a participant receives both DE and traditional classroom instruction during a program year, ACLS reviews the total number of instructional hours for the student. Any student that has greater than 50% of their hours in Instruction – Distance Learning categories in [LACES](https://laces.literacypro.com/laces/) is considered a DE participant. For [NRS](https://nrsweb.org/) reporting, states can count a participant only once, as either a DE participant or a traditional classroom participant.

Adult education programs can provide the following DE options:

* Synchronous: Virtual F2F instruction (e.g., via Zoom)
* Asynchronous: Using a Learning Management System (LMS) or other online platform. Though learning is asynchronous, it is assumed there is instruction available to students via an instructor recorded video or other video.
* Blended: A model which “blends” synchronous and asynchronous instruction.

#### Hybrid Education (HE)

Hybrid education combines in-person F2F and DE. Programs can provide the following HE options:

* Combined in-person F2F and online synchronous: For example, a class that meets six hours a week could have three hours in-person and three hours online (e.g., Zoom).
* Combined in-person F2F and asynchronous: For example, a class that meets six hours per week could have three hours in-person and three hours asynchronous work via Google classroom or an online product (e.g., Aztec, Newsela). This option uses the teacher verification model for attendance which means the asynchronous learning activity is assigned time for completion by the teacher including time the teacher spends checking the student’s work.

For more information on DE curriculum, see the Chapter 4. For more information on DE instruction, see Chapter 5. For more information on DE attendance and data collection requirements, see Appendix B.

#### Co-enrollment in Core Partner Programs

Co-enrollment in core partner programs is an option for students as long as a student can maintain an ongoing commitment to an increased amount of instruction and the programs’ class schedules do not conflict. Examples of students co-enrolled in core partner programs, also known as shared customers, include but are not limited to:

* AE students enrolled by MassHire Career Centers (MCCs) and receiving career center services leading to employment.
* AE students ages 16-24 and enrolled in Title I out-of-school youth programs.
* AE students and recipients of Department of Transitional Assistance (DTA) and/or Massachusetts Rehabilitation Commission (MRC) services.
* AE students who exit services and then enroll in a training program funded by a core partner.

For more information on shared customers, see Chapter 3 and [The Workforce Innovation and Opportunity Act (WIOA) - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/wioa.html).

### Adult Education and Family Literacy Services

ACLS funds a range of services with the goal of facilitating student success in postsecondary education, training, and family-sustaining employment. WIOA requires the integration of workforce preparation activities and digital literacy development in these services. The following chart summarizes program design options for CALCs and AECIs.

|  |
| --- |
| **Services offered by CALCs and AECIs** |
| * Adult Basic Education (ABE) Class Levels by EFL
	+ - Adult Basic Education Level 1 (Beginning Literacy)
		- Adult Basic Education Level 2 (Beginning Basic)
		- Adult Basic Education Level 3 (Low Intermediate)
		- Adult Basic Education Level 4 (High Intermediate)
		- Adult Basic Education Level 5 (Low Adult Secondary)
		- Adult Basic Education Level 6 (High Adult Secondary)
 |
| * Adult Diploma Program (ADP)
 |
| * Spanish Adult Basic Education (formerly known as Spanish High School Equivalency)
 |
| * First Language Literacy (formerly known as Native Language Literacy)
 |
| * English for Speakers of Other Languages (ESOL) Class Levels by EFL
	+ - ESOL Level 1 (Beginning ESOL Literacy)
		- ESOL Level 2 (Low Beginning ESOL)
		- ESOL Level 3 (High Beginning ESOL)
		- ESOL Level 4 (Low Intermediate ESOL)
		- ESOL Level 5 (High Intermediate ESOL)
		- ESOL Level 6 (Advanced ESOL)
 |
| * [MassSTEP ABE](https://www.doe.mass.edu/acls/MassSTEP/default.html) (Pre-Adult Secondary Education/Adult Secondary Education)
 |
| * [MassSTEP ESOL](https://www.doe.mass.edu/acls/MassSTEP/default.html) (English for Speakers of Other Languages)
 |
| * [Transition to Community College](https://www.doe.mass.edu/acls/cc/)[[7]](#footnote-8)
 |

#### Basic Skills and Pre-Adult Secondary Education (Pre-ASE)

The goal of basic skills and pre-ASE services is to improve students’ skills in preparation for higher levels of instruction. Curricula include reading, writing, speaking and listening, science, history/social studies, and mathematics skills aligned to the [*College and Career Readiness Standards for Adult Education*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) *(CCRSAE)* and necessary for functioning at levels comparable to students in the first through eighth grade. WIOA requires the integration of workforce preparation activities and digital literacy development in these services.

#### Adult Secondary Education (ASE) and High School Equivalency (HSE) Preparation

The goal of ASE services is to enable students to earn the Massachusetts HSE credential in order to successfully transition into and succeed in postsecondary education, training, and employment. Curricula should be contextualized to the academic demands of HSE assessments and include reading, writing, speaking and listening, science, history/social studies, and mathematics skills aligned to the [*College and Career Readiness Standards for Adult Education*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) *(CCRSAE)* and necessary for functioning at levels comparable to students in the ninth through twelfth grade. WIOA requires the integration of workforce preparation activities and digital literacy development in these services. (Note: Programs have the option of embedding science and history/social studies vocabulary and concepts in ELA and mathematics curricula or offering separate classes for science and history/social studies.)

High school testing fees must not be charged to AE grants.

Programs that provide HSE test preparation for the HiSET® or GED® must be familiar with the:

* Massachusetts HSE assessment policies;
* Academic requirements of the Massachusetts HSE assessments; and
* Websites where students register for the HSE assessments.

For more information on HSE, including instructions about Commonwealth of Massachusetts payments for HiSET® and GED® testing fees, see [High School Equivalency (HSE) Testing Program - Massachusetts Department of Elementary and Secondary Education](https://www.doe.mass.edu/hse/default.html).

#### Adult Diploma Program (ADP)

An ADP is a sequence of classes and/or academic tasks, the goal of which is for students to earn an accredited, verifiable high school credential issued by a high school or local school district in order to successfully transition into and succeed in postsecondary education, training, and employment. The school district approves the ADP curricula, determines the process for earning the credential, and may impose additional eligibility requirements beyond those established by ACLS. Because the credential earned is a high school diploma, students must comply with Massachusetts state laws regarding the Competency Determination standard.

Programs have the option of supporting an ADP to provide an alternative to the HiSET® or GED® as a path to a high school diploma. ADPs are required to partner with their local school districts for approval of curricula and credentialing options.

For more information on the Competency Determination standard, see [Massachusetts Graduation Requirements and Related Guidance - Massachusetts Comprehensive Assessment System.](https://www.doe.mass.edu/mcas/graduation.html) For more information on the ADP, see [Adult Diploma Programs - High School Equivalency (HSE) Testing Program (mass.edu).](https://www.doe.mass.edu/hse/adp/).

### Instruction in Students’ First Language

ACLS funds support two models of instruction in students’ first language when that language is not English: first language literacy (FLL) and Spanish adult basic education (Spanish ABE).

#### First Language Literacy (State Requirement)

The goal of FLL instruction is to support students who speak other languages to develop foundational literacy skills in their first language including reading, writing, speaking, and listening, and mathematics for students who need it.

Programs providing FLL services must ensure that FLL students are available for ESOL instruction in addition to first language instruction, receive instruction in English language acquisition, and provide ESOL curriculum and instruction aligned to the [*Massachusetts English Language Proficiency Standards for Adult Education (MA ELPS*](https://www.doe.mass.edu/acls/frameworks/frameworks.html)*)*. This will help students acquire the basic skills needed to be prepared for further education and training and improve their English language skills so they make gains on required Massachusetts-approved ESOL assessments. FLL students must be tested with one of the NRS-approved ESOL assessments used in Massachusetts (i.e., BEST Plus 2.0, CLAS E Reading, and CLAS E Writing) to attain ESOL outcomes. For a summary of FLL policy, see the following chart.

|  |
| --- |
| First Language Literacy (FLL, formerly known as native language literacy) |
| Student Need | Curriculum & Instruction | Assessment (NRS) | Enrollment & Data | Student Outcomes |
| Student needs basic instruction in their first language to build a foundation for learning English. | - Students are enrolled in a first language literacy class. They receive basic instruction in their first language. Curriculum should be aligned to the CCRSAE to the maximum extent possible.- Students must also receive ESOL services. ESOL curriculum should be aligned to the MA ELPS. | Students must be assessed with a Massachusetts NRS approved ESOL test. | Students are considered ESOL enrollments for the purposes of funding, enrollment targets, and data collection. | EFL (ESOL) |

For more information on assessment, see the [Massachusetts Adult Education Assessment Policies](https://www.doe.mass.edu/acls/assessment/assessmentpolicies.pdf).

#### Spanish Adult Basic Education (State Requirement)

In Spanish ABE classes, students receive instruction in all levels of academic content (i.e., basic skills through adult secondary education) and curriculum is aligned to the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) to the maximum extent possible. Program design for students preparing for the Spanish HSE credential takes into consideration factors including, but not limited to, research-based strategies for concurrent instruction in students’ first language and English; curriculum and instruction relevant to students’ needs (e.g., instruction in mathematics for students who need it, HSE level content); and student availability for ESOL instruction in addition to first language instruction.

Programs providing preparation for the Spanish HSE must ensure that students receive instruction in ESOL and ESOL curriculum is aligned to the [*MA ELPS*](https://www.doe.mass.edu/acls/frameworks/frameworks.html). This will help them acquire the basic and more advanced skills needed to be prepared for further education and training and improve their English language skills so they make gains on Massachusetts-approved ESOL assessments.

Students who are preparing for the HSE credential in Spanish are considered ABE enrollments for the purposes of funding, enrollment targets, and data collection. They may be assessed with the MAPT-CCR, the TABE Literacy, or a Massachusetts approved [NRS](https://nrsweb.org/) ESOL test to earn ABE or ESOL outcomes. For a summary of Spanish ABE policy, see the following chart.

|  |
| --- |
| Spanish Adult Basic Education (Spanish ABE, formerly known as Spanish HSE) |
| Student Need | Curriculum & Instruction | Assessment (NRS) | Enrollment & Data | Student Outcomes |
| Student needs instruction in Spanish to be prepared for further education and training and earn a Spanish HSE credential. | - Students receive instruction in all levels of academic content (i.e., basic skills through adult secondary education) in Spanish. Curriculum should be aligned to the CCRSAE to the maximum extent possible.- Students must also receive ESOL services. ESOL curriculum should be aligned to the MA ELPS. | Students may be assessed with the MAPT-CCR **or** the TABE Literacy **or** a Massachusetts NRS approved ESOL test. | Students are considered ABE enrollments for the purposes of funding, enrollment targets, and data collection. | EFL (ESOL)\*EFL (ABE)\*HSE (Spanish) |
| \*EFL outcomes depend on the NRS assessment administered. |

Note: The [NRS](https://nrsweb.org/) and [LACES](https://laces.literacypro.com/laces/) use a participant’s initial assessment to determine whether the student is considered an ABE or ESOL participant. However, Massachusetts grantees that offer ABE content instruction in Spanish have ABE enrollment targets even though many of the students enrolled in these classes take an ESOL test as their initial assessment. The enrollment reports and desk reviews count the student as an ABE enrollment regardless of the initial assessment if the student and class information is correct in LACES.

For information on assessments, see the [Massachusetts Adult Education Assessment Policies](https://www.doe.mass.edu/acls/assessment/assessmentpolicies.pdf). For instructions on entering student and class information for Spanish ABE students in LACES, see [LACES Student Data Management System Information - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/laces/default.html).

#### English for Speakers of Other Languages (ESOL) Services

The goal of ESOL services is to prepare adult English learners to speak, read, and write English. ESOL curriculum and instruction must be contextualized to students’ academic and career needs, aligned to the [*MA ELPS*](https://www.doe.mass.edu/acls/frameworks/frameworks.html) and integrate civics education, workforce preparation activities, and digital literacy development at all levels. Services must be designed to reach all learners regardless of their level of readiness, previous schooling, or learning differences.

Students with pre-test scores resulting in an entry level of Completed ESOL Level 6:

* Cannot be considered ESOL participants (i.e., cannot enroll in an ACLS-funded ESOL class).
* Are eligible to enroll in an ACLS-funded ABE class.

Students with post-test scores resulting in a level of Completed ESOL Level 6 may finish the program year.

#### MassSTEP ABE and ESOL

The MassSTEP ABE model combines pre-ASE and ASE instruction, occupational skills training, and workforce preparation activities13 concurrently and contextually to increase ABE students’ educational and career advancement. In this service delivery model, a variety of team-teaching strategies are used to deliver the curriculum. Students in need of a high school credential must earn one by the conclusion of the program. Upon completion, it is intended that students will have obtained an industry recognized credential and will be employable or go on to more advanced training in their chosen career pathway.

The MassSTEP ESOL model combines ESOL instruction, civics education, occupational skills training, and workforce preparation activities concurrently and contextually to increase ESOL students’ educational and career advancement. In this service delivery model, a variety of team-teaching strategies are used to deliver the curriculum. Upon completion, it is intended that students will have obtained an industry recognized credential and will be employable or go on to more advanced training in their chosen career pathway.

For more information on MassSTEP ABE and MassSTEP ESOL, see [MassSTEP - Adult and Community Learning Services (ACLS)](https://www.doe.mass.edu/acls/MassSTEP/default.html). For more information on career pathways, see [Career Pathways - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/acp/).

### Family Literacy Activities[[8]](#footnote-9)

Family literacy refers to parents and children learning together. These services help both generations in the family succeed by building the capacity of parents to improve their language and literacy skills while learning how to better support their children’s learning. Tools that can help accomplish these goals include but are not limited to shared reading, interactive literacy activities, parenting support, and helping parents communicate more effectively with their children’s teachers. Family literacy services may be provided to ABE and ESOL students.

### Volunteer Services[[9]](#footnote-10)

ACLS supports effective instruction from well-trained and well-supported volunteers provided to students enrolled in CALC and AECI programs.

## Chapter 2: [Indicator 2: Equitable Access](#_Toc468698121)

Equitable access refers to the guiding principle that every adult in Massachusetts must have an opportunity to access AE services for the purpose of gaining the knowledge, skills, and support they need to build the life they aspire to live.

### Eligibility (State Requirement)

ACLS requires that enrolled students:

* Are at least 16 years of age;
* Are not enrolled or required to be enrolled in secondary school under state law; and
* Do not have a secondary school diploma or its recognized equivalent and have not achieved an equivalent level of education; or are basic skills deficient; or are English language learners.

Students under 18 must provide a letter of withdrawal from the local school district in order to enroll in the program. Students who are home schooled must provide a letter from the local school district stating that they are not enrolled.

### Prioritization (State Requirement)

ACLS requires that there be regional opportunities for all eligible individuals, especially those with barriers to employment, including individuals with disabilities, to improve their literacy skills.

WIOA requires that programs using funds to carry out a program for incarcerated individuals in a correctional institution give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. For more information on corrections education, see [The Workforce Innovation and Opportunity Act (WIOA) - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/wioa.html).

### Waitlist (State Requirement)

ACLS requires that programs maintain an active waitlist for applicants who are unable to enroll in instructional classes due to capacity constraints. For more information on waitlist policy, see Chapter 10.

### Intake and Orientation

WIOA requires that programs identify those adults who, in addition to being eligible for services, face one or more barriers to employment. This requirement is intended to shed light on how well students with barriers are being served by the workforce system. Programs may use whatever intake forms they wish as long as the forms solicit and collect all the information needed to do data entry in [LACES](https://laces.literacypro.com/laces/).

Programs enrolling students in HSE preparation classes (i.e., pre-ASE and ASE levels) must enter student information in [LACES](https://laces.literacypro.com/laces/) (i.e., student name and DOB) exactly as it appears on the government issued picture ID the student will be using to register for the HiSET® and/or GED® exams. This policy is to ensure proper data matching with HiSET® and GED® records. Programs may wish to keep a photocopy of the ID on file or scanned into [LACES](https://laces.literacypro.com/laces/).

At the beginning of each fiscal year, programs must complete intakes for new students, verify the accuracy of data in returning students’ intakes, and update data as needed. Programs are encouraged to give students program information, including program completion requirements, so that they can make an informed decision about whether they are able to pursue participation in the program. For the student intake form, see [FY2024 Student Intake Form - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/laces/intake-form/).

### Confidentiality (State Requirement)

ACLS requires that confidential student records be kept in locked files and/or in password protected databases. Students’ education records, including student data in [LACES](https://laces.literacypro.com/laces/) and records regarding students’ disabilities, are to be treated with the same confidentiality as medical records. ACLS requires that programs protect the privacy of students’ education records and seek consent for any disclosure of personally identifiable information (PII) in students’ education records. (Note: Students entrust programs with PII. Toward protecting it, ACLS requires that all users of the state information management system ([LACES](https://laces.literacypro.com/laces/)) have unique logon credentials. Programs must immediately deactivate [LACES](https://laces.literacypro.com/laces/) accounts for users who leave the program.)

#### Release of Information (ROI) (State Requirement)

Programs must ask students to provide their social security numbers[[10]](#footnote-11) and sign an ROI form. The purpose of the ROI is twofold:

* To inform students, in writing, that their personally identifiable information (PII) will be matched with data from:
	+ the Massachusetts Departments of Unemployment Assistance and Higher Education,
	+ Pearson GED ® and ETS HiSET ®,
	+ the National Student Clearing House; and
* To authorize the release of data matches to the program.

Data matched outcomes are stored securely by ACLS and aggregated for federal reports.

Students who sign the ROI form consent to have ACLS update their [LACES](https://laces.literacypro.com/laces/) records with employment data, HSE test results, and postsecondary enrollment information obtained via data matching. Declining to provide an SSN and/or sign an ROI will not impact students’ eligibility for services. (Note: ACLS recognizes signed hard copies of the ROI as well as copies of the ROI that are electronically signed.)

For the ROI form, translated into 30 languages, see [[Release of Information Form - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/laces/release-form/).](http://www.doe.mass.edu/acls/laces/release-form/.)

### The Americans with Disabilities Act (ADA)

The federal ADA places affirmative duties on public and private organizations to ensure that individuals with disabilities can access and have equal opportunities to participate in public services. Programs signing the Statement of Assurances (SOA) as part of their grant applications are assuring ACLS that they are aware of and in compliance with their ADA-related obligations.

#### Accommodations

The ADA requires that programs make reasonable accommodations for students. To ensure that programs are responsive to learners with disabilities, the ADA requires, among other things, that programs designate an ADA Coordinator whose primary role is to ensure that the program is accessible and in compliance with the ADA. ACLS does not provide additional funding to individual programs to meet specific, individual student needs upon request.

For more information on accommodations, see [Assessment - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/assessment/). For more information on the ADA, see [Office for Civil Rights | U.S. Department of Education](https://www2.ed.gov/about/offices/list/ocr/index.html), [ADA.gov](https://www.ada.gov/) and [SABES](https://www.sabes.org/pd-center/ada-training-and-resources).

### The General Education Provisions Act (GEPA)

In order to meet the requirements of [Section 427 of the General Education Provisions Act](https://www2.ed.gov/fund/grant/apply/appforms/gepa427.pdf), all grantees must complete and submit a GEPA statement in order to receive funding. GEPA requires that all providers funded by the U.S. Department of Education stipulate how they will ensure equitable participation in their programs. It is not meant to be a duplicate of the civil rights statement, but instead a description of the efforts the provider will make to ensure that barriers to participation by students, teachers, and others will be removed to allow participation. ACLS considers the GEPA statement to be a descriptive tool highlighting an agency’s continued commitment to anti-racism, diversity, equity, and inclusion. GEPA statements can also describe the specific actions taken annually that ensure barriers to participation are being addressed.

For more information on GEPA, see [Grant Experts: GEPA Examples](https://www.grantexperts.info/gepa_examples.php) and [GEPA Notice to All Applicants](https://www2.ed.gov/fund/grant/apply/appforms/gepa427.pdf).

### Mandated Reporting (State Requirement)

Adult education staff are considered mandated reporters and are required by law to report cases of suspected abuse. Mandated reporters:

* Include public and private school teachers, educational administrators, guidance or adjustment counselors, psychologists, attendance officers, social workers, day care providers, health care professionals, and court and public safety officials;
* Are immune from civil or criminal liability as a result of making a report; non-mandated reporters are also protected providing the report was made in good faith;
* Are protected from retaliation, and identities will be kept confidential; and
* Who fail to file a report are subject to a fine of up to $1,000.

For more information on mandated reporting, see the following chart.

|  |  |  |  |
| --- | --- | --- | --- |
| **Age** | 0-18 years old | 18-59 years old | 60+ years old |
| **Population** | Children | Disabled Adults | Elderly |
| **Reporting Agency** | [Department of Children and Families](http://www.mass.gov/eohhs/gov/departments/dcf/) | [Disabled Persons Protection Commission](http://www.mass.gov/dppc/) | [Executive Office of Elder Affairs](http://www.mass.gov/elders/) |
| **Statute** | 51A | 19C | 19A |

## Chapter 3: [Indicator 3: Career Pathways Collaboration](#_Toc468698122)

Career pathways collaboration provides job seekers with access to the employment, education, training, and support services they need to succeed in the workforce. This collaboration between state and local service providers supports adult education and skills development programs that accelerate the achievement of diplomas and credentials among workers, including immigrants and individuals who need to improve their English language skills.

### Local MassHire Workforce Boards (MWBs) and Memoranda of Understanding (MOU)

WIOA requires that programs collaborate with partners to enhance career pathways for students. This includes participation in planning with [MassHire Workforce Boards (MWBs)](https://www.mass.gov/service-details/connect-with-your-local-masshire-workforce-board), development of Memoranda of Understanding (MOU), and provision of services for shared customers. It may also include participation in existing partnerships including family literacy collaborations.

The [2020-2024 Massachusetts WIOA Combined State Plan](https://www.mass.gov/doc/fy2020-workforce-innovation-and-opportunity-act-wioa-massachusetts-combined-state-plan/download) and [Joint Partner Policy Communications](https://www.mass.gov/service-details/massworkforce-joint-partner-policy) guide the establishment of local area partnerships and local MOU. These requirements will specify how services can be connected, integrated, or enhanced by sharing staffing and/or other resources, or jointly designed to improve outcomes for shared customers (e.g., out-of-school youth, job seekers, and businesses). ACLS requires that programs in all 16 local workforce areas sign the local MOU with the exception of Boston where selected programs will sign the local MOU on behalf of all Boston-based adult education programs.

For more information on MOU, see [The Workforce Innovation and Opportunity Act (WIOA) - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/wioa.html), [MassWorkforce joint partner policy | Mass.gov](https://www.mass.gov/service-details/massworkforce-joint-partner-policy), and [FY2022 - FY2025 WIOA Memorandum of Understanding (MOU) | Mass.gov](https://www.mass.gov/service-details/fy2022-fy2025-wioa-memorandum-of-understanding-mou).

### Local Workforce Development Plan Packages

Each local MWB will develop a workforce development [local plan package](https://www.mass.gov/service-details/fy22-fy25-wioa-4-year-local-plans). WIOA requires that CALC and AECI proposals be reviewed for alignment with the regional workforce priorities described in the local plan packages. Local MWB representatives assess all proposals for funding alignment during the proposal review process. (Note: This requirement does not apply to applications submitted by the Massachusetts Department of Corrections.)

### [Outstationing](https://www.doe.mass.edu/acls/outstationing/)

Each of the state's [16 local workforce areas](https://www.mass.gov/service-details/connect-with-your-local-masshire-workforce-board) have allocated funding for one or more AE agencies providing outstationing services. Outstationing staff serve as liaisons between all ACLS-funded public AE programs in the workforce area and the MassHire career center system to provide two-way referrals. Programs receiving outstationing funds are required to develop a process agreed upon by local area AE programs to facilitate this system.

For more information on outstationing, see [Outstationing at MassHire Career Centers - Adult and Community Learning Services (ACLS)](https://www.doe.mass.edu/acls/outstationing/).

### Shared Customers

WIOA is designed to create a system of comprehensive services for students/customers to advance them on a career pathway regardless of the partner program in which they originally enroll. WIOA requires core partners to align, connect, and integrate services by sharing resources and jointly designing services in ways that improve outcomes for shared customers (e.g., youth, job seekers, and businesses) and prioritize serving individuals with barriers to employment (e.g., undereducated and limited English proficient adults). Core partners will work together to redesign the MCC customer flow and service practices across partner agencies including mapping regional career pathways and the accessibility and availability of services to shared customers.

A shared customer is a student enrolled in more than one core partner program at any time during a fiscal year (i.e., co-enrolled or sequentially enrolled). Examples of shared customers include, but are not limited to, the following:

* ABE/ESOL students also enrolled in a MassHire Career Center (MCC) and receiving services leading to employment;
* ABE/ESOL students ages 16-24 also enrolled in WIOA - Title I out-of-school youth programs;
* ABE/ESOL students who also receive services from WIOA partner agencies such as the Department of Transitional Assistance (DTA), Massachusetts Rehabilitation Commission (MRC), and Massachusetts Commission for the Blind (MCB); and
* ABE/ESOL students who exit AE services and then enroll in a training program funded by a core partner before the end of the fiscal year.

For more information on shared customers, see [The Workforce Innovation and Opportunity Act (WIOA) - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/wioa.html).

## Chapter 4: [Indicator 4: Curriculum](#_Toc468698123)

Curriculum refers to the knowledge and skills students are expected to learn, which includes the learning standards they are expected to meet; the units and lessons teachers teach; the assignments and projects given to students; the books, materials, videos, presentations, and readings used in a course; and the tests, assessments, and other methods used to evaluate student learning.[[11]](#footnote-12)

A program’s curriculum includes, at a minimum:

A scope and sequence for each level that provides a big picture view of the curriculum and describes the instructional units to be taught;

* A series of instructional units that delve into more detail than the big picture overview in the scope and sequence; and
* Sequenced and coordinated lesson plans that make up the instructional units.

For scope and sequence, unit plan, and lesson plan templates, see [ACLS Curriculum Templates and Helpful Resources - Adult and Community Learning Services (ACLS) (mass.edu).](https://www.doe.mass.edu/acls/frameworks/resources.html)

### Curriculum Requirements for ABE (State Requirement)

Programs offering ABE instruction in mathematics and English Language Arts/Literacy (ELA), including ACLS-approved forms of DE, are required to implement curriculum aligned to the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf). ABE curriculum and instruction are required to reflect the instructional shifts and align at all levels with the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) levels A through D-E. Additionally, ABE curriculum must integrate evidence-based reading instruction as per the WIOA requirement that ABE students receive evidence-based reading instruction.

Programs offering ABE distance education may use a variety of resources (including online products such as Aztec, Newsela, and KET Fast Forward) that enable students to access high quality, rigorous instruction and that best fit their academic needs. ACLS does not mandate or approve use of individual online products. The choice of online products is left to the discretion of local programs.

#### Essential Components of Reading and Evidence-Based Reading Instruction (EBRI)

Reading is a complex system of making meaning from print. Proficient readers must understand how phonemes, or speech sounds, are connected to print and be able to decode unfamiliar words; read fluently; possess sufficient background knowledge and vocabulary to foster reading comprehension; and develop active strategies to construct meaning from print.

Alphabetics, fluency, vocabulary, and comprehension are known as the essential components of reading. WIOA requires that ABE curriculum and instruction provide explicit and systematic instruction on the essential components of evidence-based reading instruction (EBRI) to adult learners at all levels. EBRI refers to instructional practices that have been proven by systematic, objective, valid, and peer-reviewed research to lead to predictable gains in reading achievement. The research produced findings that are the foundation of evidence-based reading practices. EBRI practices for primary focus differ according to students’ EFL as indicated in the following chart.

|  |  |
| --- | --- |
| **Student EFL Level** | **Primary Focus of Instruction** |
| **Beginner** (Beginning Literacy and Beginning Basic Education Levels) | Print-based skills (i.e., alphabetics, fluency) |
| **Intermediate** (Low Intermediate Basic Education and High Intermediate Basic Education Levels) | Print-based skills (i.e., alphabetics, fluency), meaning-based skills (i.e., vocabulary, comprehension), or both |
| **Advanced** (Low Adult Secondary Education and High Adult Secondary Education Levels) | Meaning-based (i.e., vocabulary, comprehension) |

For more information on EBRI and the STAR Reading Initiative, see [Evidence-Based Reading Instruction and STAR](http://www.doe.mass.edu/acls/rfp/star.html), and the SABES ELA Curriculum and Instruction PD Center’s [EBRI](https://www.sabes.org/ebri) and [STAR](https://www.sabes.org/star) webpages.

### Curriculum Requirements for ESOL (State Requirement)

Programs offering ESOL instruction, including ACLS-approved forms of distance education, are required to implement curriculum aligned to the [*MA ELPS*](https://www.doe.mass.edu/acls/frameworks/frameworks.html). These standards incorporate the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) for ELA/Literacy and the instructional shifts for ELA and contextualize them within the lens of English language learning. Additionally, ESOL curriculum must integrate civics education as per the WIOA requirement that ESOL students receive instruction in civics.

The [*MA ELPS*](http://www.doe.mass.edu/acls/frameworks/frameworks.html)are the standards to use for English language acquisition. Programs providing mathematics instruction to English learners should align instruction to the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf)for mathematics and the Standards for Mathematical Practice, so that instruction is reflective of the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf)for mathematics instructional shifts.

Programs offering ESOL distance education may use a variety of resources (including online products such as EnGen, Burlington English, and Newsela) that enable students to access high quality, rigorous instruction and that best fit their academic needs. ACLS does not mandate or approve use of individual online products. The choice of online products is left to the discretion of local programs.

For more information on English language acquisition, see [ESOL | SABES](https://www.sabes.org/pd-center/esol) and [Adult Education and Family Literacy Act: English Language Acquisition -- March 2015 (PDF)](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/english-language-acquisition.pdf).

### Curriculum Requirement for Distance Education (State Requirement)

Programs offering ACLS-approved forms of distance education (DE) are required to align their curriculum and instruction to the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) and/or [*MA ELPS*](http://www.doe.mass.edu/acls/frameworks/frameworks.html) depending on the type of service offered. Programs may use a variety of resources including online products (e.g., Aztec, Newsela, KET Fast Forward, and EnGen) and must provide high quality, rigorous instruction. ACLS does not mandate or approve use of individual online products. The choice of online products is left to the discretion of local programs.

For more information on ACLS-approved forms of DE, see Appendix B.

### Curriculum Requirements for All Programs

WIOA requires all programs integrate workforce preparation activities and digital literacy development in curriculum at all levels in order to teach employability skills and prepare students for college and career pathways. For definitions of the terms workforce preparation and digital literacy, Chapter 5.

## Chapter 5: [Indicator 5: Instruction and Assessment](#_Toc468698123)

High quality instruction and assessment are equally essential to student learning as is curriculum aligned to standards. Teachers who use their knowledge of the subjects they teach, leverage their understanding of how students learn those subjects, and review student assessments for signs of progress are well positioned to help students achieve outcomes.

### Alignment of Instruction to Standards (State Requirement)

ACLS requires instruction be aligned to standards and key instructional shifts as follows:

* The [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) for ELA and Mathematics for ABE instruction
* The [*MA ELPS*](http://www.doe.mass.edu/acls/frameworks/frameworks.html) for English language acquisition and the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) for Mathematics for instruction in ESOL[[12]](#footnote-13)

For more information on standards-based instructional support, see [ELA: Resources, Research and Curriculum | SABES,](https://www.sabes.org/pd-center-resources/29) [Math Curriculum Resources | SABES,](https://sabes.org/content/math-curriculum-resources) [Math Instruction Resources | SABES,](https://sabes.org/content/math-instruction-resources) and [ESOL: Resources, Research and Curriculum | SABES.](https://sabes.org/pd-center-resources/34)

### Integration of Workforce Preparation and Digital Literacy in ABE and ESOL Instruction

WIOA requires that programs integrate workforce preparation activities and digital literacy development at all levels of ABE and ESOL instruction so that students obtain the skills necessary for transitioning to college and careers and obtaining employment that leads to family-sustaining wages.

Workforce preparation is defined as activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education.

Digital literacy is defined as the skills associated with using technology to enable users to find, evaluate, organize, create, and communicate information. Digital literacy [[13]](#footnote-14)means having the skills you need to live, learn, and work in a society where communication and access to information is increasingly through digital technologies like internet platforms, social media, and mobile devices. Digital literacy means having the skills you need to live, learn, and work in a society where communication and access to information is increasingly through digital technologies like internet platforms, social media, and mobile devices.[[14]](#footnote-15)

The integration of digital literacy into curriculum and instruction is required in order to provide opportunities for students to explore, experiment, and develop expertise using real world applications for digital literacy while building their academic skills. Programs are expected to incorporate a variety of tools and technologies into the classroom to support learning.

For more information on workforce preparation, see [ACES / Transitions - ATLAS ABE](https://atlasabe.org/key-activities/aces/), [PCRN: Employability Skills (ed.gov)](http://cte.ed.gov/initiatives/employability-skills-framework), and [Teaching Skills That Matter Workforce Preparation](https://lincs.ed.gov/state-resources/federal-initiatives/teaching-skills-matter-adult-education/workforce-preparation). For more information on digital literacy instruction, see [IDEAL Distance Education and Blended Learning Handbook, 8th Edition (edtechbooks.org)](https://edtechbooks.org/ideal_dl_handbook)*,* [Digital Resilience in the American Workforce - EdTech Center @ World Education](https://edtech.worlded.org/digital-resilience-in-the-american-workforce/), [Digital Literacy in Adult Education - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/frameworks/DigitalLiteracy.html), and [Teaching Skills that Matter Digital Literacy | Adult Education and Literacy | U.S. Department of Education](https://lincs.ed.gov/state-resources/federal-initiatives/teaching-skills-matter-adult-education/digital-literacy).

### Integration of EBRI in ABE Instruction

WIOA requires that ABE services include explicit and systematic instruction on the essential components of evidence-based reading instruction (EBRI) to adult learners at all levels.

For more information on EBRI, see [Evidence-based Reading Instruction (EBRI)/STAR - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/rfp/star.html), [Evidence-Based Reading Instruction (EBRI) | SABES](https://www.sabes.org/content/ebri) and [STAR - The STudent Achievement in Reading Initiative | SABES](https://www.sabes.org/content/star).

### Integration of Civics Education in ESOL Instruction

WIOA requires that programs integrate civics education into ESOL instruction.

For more information and sample model lessons on how to incorporate civics in ESOL instruction, see [Teaching Skills that Matter Civics Education | Adult Education and Literacy | U.S. Department of Education](https://lincs.ed.gov/state-resources/federal-initiatives/teaching-skills-matter-adult-education/civics-education).

The following chart summarizes ACLS and WIOA curriculum and instruction requirements.

|  |  |  |
| --- | --- | --- |
|  **Requirement** | **ABE Instruction** | **ESOL Instruction** |
| Aligned to CCRSAE | X |   |
| Aligned to MA ELPS |   | X |
| Evidence-Based Reading Instruction | X |   |
| Workforce Preparation Activities | X | X |
| Digital Literacy Development | X | X |
| Civics Education |   | X |

### Assessment

Assessment[[15]](#footnote-16) refers to a wide variety of methods and tools used by educators to evaluate, measure, and document the student academic readiness, progress, skill acquisition, and educational needs of students.

### Summative Assessment (State Requirement)

Summative assessment[[16]](#footnote-17) is used to evaluate student learning, skill acquisition, and academic achievement at the conclusion of a defined instructional period—typically at the end of a project, unit, semester, program, or school year. Examples of summative assessments include tests, performance tasks, portfolios, final exams, and standardized assessments. According to the [NRS](http://www.nrsweb.org/), the primary purpose of educational gain is to measure improvement in the basic literacy skills of participants in the AE program. It is a condition of funding that AE programs provide summative assessment for their students. ACLS requires that programs use Massachusetts-approved standardized assessments (i.e., required [NRS](https://nrsweb.org/) tests that states receiving federal AE funding must use) to report educational gain.

For more information on assessment, see [Assessment - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/assessment/), and [ACLS Test Help Blog | Resources for the online assessment trainings developed by the UMass Center for Educational Assessment](https://blogs.umass.edu/aclstesthelp/).

## Chapter 6: [Indicator 6: Student Progress](#_Toc468698124)

To ensure students achieve and maintain family-sustaining wages, it is paramount that programs help students achieve outcomes to that end. Programs must provide high quality instruction that helps students complete educational functioning levels, attain high school equivalency credentials, enroll in postsecondary education and/or training, and have viable careers.

**Standardized Assessment**

States that receive federal money to support AE programs are required to report on AE students’ educational gain. This data is submitted annually via the [NRS](https://massgov-my.sharepoint.com/personal/kathleent_rodriguez_mass_gov/Documents/Desktop/Culturally%20Responsive%20Walkthrough%20Guide.pdf), developed by the [Office of Career, Technical, and Adult Education](https://www2.ed.gov/about/offices/list/ovae/index.html). According to the [NRS](https://nrsweb.org/), the primary purpose of educational gain is to measure improvement in the basic literacy skills of participants. This goal is the reason that all participants in [LACES](https://laces.literacypro.com/laces/) are included in the [NRS](https://nrsweb.org/) educational gain measure.

For more information on the [NRS](https://nrsweb.org/) and Educational Functioning Level (EFL) test benchmarks, see [AEFLA Adult Education and Literacy](https://aefla.ed.gov/), the [National Reporting System for Adult Education](https://nrsweb.org/), and [Test Benchmarks for NRS Educational Functioning Levels (EFL) (updated August 2019)](https://nrsweb.org/resources/test-benchmarks-nrs-educational-functioning-levels-efl-updated-august-2019).

### Assessment (State Requirement)

Student progress is measured by gains in EFLs. ACLS requires that programs pre- and post-test a minimum of 80%of their students and comply with statewide assessment policies including policy changes as they are issued.

For more information on assessment policies, see [Assessment - (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/assessment/). For more information on standardized assessment, see Chapter 6 and [ACLS Test Help Blog | Resources for the online assessment trainings developed by the UMass Center for Educational Assessment](https://blogs.umass.edu/aclstesthelp/).

### Measurable Skills Gain (MSG) and Performance Accountability (State Requirement)

ACLS documents performance using a performance standard called Measurable Skills Gain (MSG). MSG includes three outcomes which must be achieved during the fiscal year to receive credit: Educational Functioning Level (EFL) completion, [High School Equivalency (HSE)](http://www.doe.mass.edu/hse/) credential attainment, and Postsecondary Education or Training (PSE/T) enrollment. (Note: Postsecondary enrollment must start after a student exits from the AE program.)

For more information on MSG, see [MA Measurable Skills Gain (MSG) - Performance Accountability - (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/accountability/outcomes/msg.html).For more information on [LACES](https://laces.literacypro.com/laces/), see [LACES Student Data Management System Information - (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/laces/).For more information on the Massachusetts performance accountability system, see [Accountability System - (ACLS) (mass.edu).](https://www.doe.mass.edu/acls/accountability/.)

## Chapter 7: [Indicator 7: Advising and Student Support Services](#_Toc468698125)

The importance of advising should not be underestimated. DeSouza states that “Academic advisors can play an integral role in promoting student success by assisting students in ways that encourage them to engage in the right kinds of activities, inside and outside the classroom.”[[17]](#footnote-18) Light supports that notion, noting further that “Good advising may be the single most underestimated characteristic of a successful college experience.”[[18]](#footnote-19)

### Advising (State Requirement)

ACLS requires that advising be available to all students. At a minimum, advising services must address:

* Development of career pathways that allow students to make informed decisions regarding postsecondary education, training, and/or employment;
* Barriers to participation by referring students to outside social service agencies; and
* Collaboration among advisors and instructors to create a culture of student self-efficacy and persistence.

For more information on advising, see Indicator #7 of the [Indicators of Program Quality](https://www.doe.mass.edu/acls/accountability/program-quality/) (IPQs) and [[Advising and Student Support Services - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/ecp/).](https://www.doe.mass.edu/acls/ecp/)

### Advising for Out-of-School Youth (State Requirement)

ACLS requires that AE staff with advising responsibilities[[19]](#footnote-20) discuss students’ educational options (i.e., AE, return to K-12) prior to enrolling. If a student wishes and is eligible to return to K-12, the advisor must work with the school to facilitate the student’s re-entry.

For students aged 16-24, AE staff education with advising responsibilities must provide students with up-to-date written information about the Title I youth programs and services offered by partners in the local area. If a student expresses an interest, the advisor must work with the partner(s) to facilitate access to programs and services.

For more information on advising, see [Advising & Student Support Services | SABES](https://sabes.org/pd-center/advising-student-support-services).

## Chapter 8: [Indicator 8: Organizational Support](#_Toc468698126)

The success of an AE program rests on the effective implementation of policy requirements derived from multiple sources (e.g., federal legislation, state regulations, research, data). Grantees, including sites and subgrantees, are required to abide by federal and state policies. Consequences for failing to abide by these policies may include but are not limited to conditional funding, corrective action, withholding of funds, grant reduction, or grant termination.

### Program Governance (State Requirement)

ACLS requires that programs provide accountability to an active governing board which has decision making authority, including fiduciary responsibility, whose membership is different from the program’s operating staff.

In the case of public agencies, the board and related protocol requirements are fulfilled by public oversight bodies (e.g., school committees). In the case of private, non-profit organizations, the board must be significantly independent of the program director and ensure proper review and approval of the program’s expenditures. The board must have documented protocols for hiring and evaluating the program director and for checks and balances on the director’s policy and decision-making authority (e.g., procedures must specify the amount at which checks must be co-signed by a member of the board).

### Lead Agencies

Organizations that accept grant funds are accountable for all aspects of grant oversight including compliance with federal and state fiscal and data policies. For more information on grantee responsibilities, see Chapter 10.

### Facilities and Technology (State Requirement)

Grantees must take steps to ensure in-person facilities and classes are equipped to support high quality teaching. They must operate programs at sites that are safe, age-appropriate, conducive to learning, and that meet all city, state, and federal accessibility and safety requirements. Additionally, ACLS requires that all programs ensure the privacy and security of PII and advising spaces, and that sufficient up-to-date technology is readily available for all staff.

### Distance Education and Digital Literacy Development (State Requirement)

Programs must take steps to support high quality distance education that is accessible to all students. Additionally, programs must support the digital literacy development of students at every level and ensure that sufficient up-to-date technology is readily available for all students.

### Salaries and Benefits (State Requirement)

ACLS requires that programs compensate staff according to the following minimum salaries.

|  |  |  |
| --- | --- | --- |
| **Position** | **With fringe** | **Without fringe** |
| Administrator | $30.00 | $39.00 |
| Professional | $22.00 | $28.00 |
| Support Staff | $17.00 | $21.00 |

ACLS requires that programs compensate staff for all job responsibilities including prep time and professional development for teachers. ACLS supports programs that provide staff compensation above the minimum to support retention and sustaining wages for adult educators.

### Administrator Qualifications (State Requirement)

All staff charged with implementing the roles and responsibilities of a program director (e.g., planning and management in program design, leadership, operations, human resources, budgeting, collaborations, risk management) are required to have, at a minimum, a bachelor’s degree regardless of the title of their position (e.g., assistant director, coordinator) and two years of experience in education, management, or program administration.

When there is a change in program leadership (i.e., the person responsible for the overall management of the program), programs must notify ACLS and submit a copy of the new director’s resume.

### Staff Qualifications (State Requirement)

ACLS requires that all teachers have, at a minimum, a bachelor’s degree. ACLS also requires that programs establish minimum qualifications for advisors. (Note: In certain circumstances, programs may be eligible for a waiver to hire a teacher who is currently enrolled in college and within two years of completion of a bachelor’s degree. A program that discovers a need to pursue this option is required to submit a written request to the state administrator.)

## Chapter 9: Indicator 9: Educational Leadership

Educational leaders matter. They help the programs they lead navigate challenging environments and adapt to advances in technology and policy directives from federal and state governments as they emerge. Amid this complex environment, they create and sustain conditions that enable powerful teaching and learning to occur and guide a continuous improvement process that supports high quality practices and a shared vision for student and staff success.

### Data-informed Continuous Improvement

Educational leaders are required to collect and analyze a variety of instructional, program, and regional data to inform decisions and engage in a data-informed continuous improvement planning process that involves all stakeholders, including students, and incorporates their feedback, reflections, and recommendations for improvement.

For more information on continuous improvement planning, see [Program Management and Educational Leadership | SABES](https://www.sabes.org/pd-center/program-management-and-educational-leadership).

Resource Allocation

Educational leaders are required to ensure that sufficient human and financial resources are available to ensure culturally and linguistically sustaining practices and policies that support a diverse and inclusive environment; promote reflection, shared responsibility, and clear communication; and maintain high expectations for all students and staff.

For more information on the fiscal responsibilities of grantees, see Chapter 10. For more information on culturally and linguistically sustaining practices, see [Homepage | SABES](https://www.sabes.org/).

Curriculum and Instruction and Student Outcomes

Educational leaders are required to ensure that curriculum is aligned to [state learning standards](https://www.doe.mass.edu/acls/frameworks/frameworks.html) and the program uses research- and evidence-based instructional practices, as well as formative and summative assessments, to promote all students’ academic success.

For more information on curriculum and instruction, see Chapter 4, Chapter 5, and [Curriculum and Instruction - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/frameworks/default.html). For more information on student outcomes, see [MA Measurable Skills Gain (MSG) - Performance Accountability - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/accountability/outcomes/msg.html).

### Professional Standards and Staff Supervision (State requirement)

Educational leaders are required to have a process in place for evaluating staff effectiveness. The process must include use of the [adult education professional standards](https://www.doe.mass.edu/acls/edueffectiveness/default.html) for on-going teacher observation and supervision and ensure that all teachers design and deliver high quality curriculum and instruction. It must include, at a minimum, annual staff evaluations and a balanced number of both formal and informal class observations per year per teacher (where possible) with written and actionable feedback and follow-up.

If qualified staff or individuals other than the program director are responsible for these duties (e.g., lead teachers with content expertise), the program director must have sufficient knowledge of educational practices such as curriculum, instruction, and advising to effectively supervise the leaders designated to fulfill these duties.

For more information on supervision, evaluation, continuous learning, and educator effectiveness, see the [Classroom Visit Toolkit,](https://www.doe.mass.edu/acls/edueffectiveness/default.html) the [Educator Growth and Effectiveness (EGE) Cycle](https://www.doe.mass.edu/acls/edueffectiveness/default.html) and [Educator Effectiveness - Adult and Community Learning Services (ACLS) (mass.edu)](https://www.doe.mass.edu/acls/edueffectiveness/default.html).

Professional Development (PD)

Educational leaders are required to ensure staff regularly participate in high quality professional development (HQPD) that is clearly tied to individual and program needs as well as student outcome data. They are also required to regularly evaluate the impact of PD as measured by improved instructional and program practices and, in collaboration with staff, make informed decisions on how to adapt PD.

Staff may participate in PD individually and/or in teams onsite and/or offsite to ensure that all students are prepared for further education and/or training. (Note: ACLS requires that programs compensate staff for all job responsibilities including PD time.)

For more information on PD and HQPD, see [The Massachusetts Adult Education Professional Development System - Adult and Community Learning Services (ACLS)](https://www.doe.mass.edu/acls/pd/default.html) and [Homepage | SABES](https://www.sabes.org/).For more information on educator proficiency and effectiveness, see the Indicators of Knowledge and Sample Applications in the [Massachusetts Professional Standards for Teachers of Adult Speakers of Other Languages](https://www.doe.mass.edu/acls/edueffectiveness/default.html), the [English Language Arts and Mathematics Proficiency Guides](https://www.doe.mass.edu/acls/edueffectiveness/default.html), and the [Indicators of Effective Advising](https://www.doe.mass.edu/acls/edueffectiveness/default.html). For more information on educational leadership, see Appendix C and [Program Support | SABES](https://www.sabes.org/pd-center/program-support).

## **Chapter 10: Indicator 10: Fiscal and Data Accountability**

The success of an AE program rests on the effective implementation of policy requirements derived from multiple sources (e.g., federal legislation, state regulations, research, data). Organizations that accept funds (i.e., a contract, a grant) from DESE[[20]](#footnote-21) are accountable for spending public funds appropriately, maintaining sound, stable financial conditions, and operating in a financially responsible and transparent manner with data integrity. Grantees, including sites and subgrantees, that fail to abide by federal and state policies will face consequences including but not limited to conditional funding, corrective action, withholding of funds, grant reduction, or grant termination.

### Fiscal Responsibilities and Grant Administration

Grantees must comply with the terms, conditions, and regulations accompanying the grant award, accept full legal responsibility for the administration of the project, and meet all stated performance requirements. Therefore, it is essential that grantees make every effort to follow sound management practices and policies throughout the entire grant cycle. Grantees must ensure that DESE grants are managed with sound, stable fiscal practices documented in a comprehensive system of written internal policies and procedures (i.e., controls) that meet state and federal requirements and support the reporting of financial results annually. See [2 CFR Part 200.302](https://www.ecfr.gov/cgi-bin/text-idx?SID=a32963af34d3c94b854882a21e8d77e9&mc=true&node=se2.1.200_1302&rgn=div8) for more information. (Note: All requirements that apply to DESE grant funds also apply to match funds.)

Grantees must have an accounting system that maintains separate and auditable records for each grant award it receives. An effective accounting system tracks revenue and expenditures to demonstrate that funds were used appropriately and according to the approved budget. Specifically, the accounting system must be able to provide data to prepare federal, state, and DESE reports. These reports include budget versus actual, time and effort, and final financial reports. Grantees must have effective control and accountability over all funds, property, and assets and written procedures in place that can be used to determine allowable costs under the cost principles in [2 CFR Part 200 Subpart E](https://www.ecfr.gov/current/title-2/part-200/subpart-e). By maintaining such an accounting system, grantees ensure that all grant funds are expended according to applicable regulations.

Grantees may budget for subawards[[21]](#footnote-22) including subgrants and subcontracts. A subaward is for the purpose of carrying out a portion of a federal award and it creates a relationship with the grantee. Major subawards do not incur indirect costs to the same degree as other activities. The definition of a major subaward is one that exceeds $25,000 in expenditures per year. Generally, only the passthrough agency (i.e., DESE) may subaward grant funds, however, in special circumstances DESE may approve the grantee to subaward grant funds.

### Record Keeping

Grantees’ financial management, accounting, and reporting systems must be able to maintain records that identify the source and application of funds for each grant and accompanying matching funds separately. The financial management, accounting, and reporting systems must be able to maintain records to identify the source and application of funds for federal and state sponsored activities in DESE grants. Specifically, the accounting system must:

* Have a chart of accounts that identifies DESE grants and matching funds applicable to each grant.
* Be able to produce budget versus actual reports. These reports compare the approved budget versus actual spending and provide a useful tool because they help grantees maintain compliance with approved grant budgets. Using them, programs can forecast needed changes in individual object classes, if necessary (i.e., over 10% or $10,000), and obtain approval from ACLS in a timely manner. [GEM$](https://mass.egrantsmanagement.com/default.aspx?ccipSessionKey=638225092094851461), the DESE grants management system, does not allow overruns, only expenses incurred in the object class up to the total amount allotted can be requested for reimbursement.
* Record grant funds and required matching funds separately in the grantee’s accounting system. Comingling of funds is not an accepted practice.
* As required by federal and state grant regulations, include authorizations; obligations and unobligated balances; expenditures; assets; and income and interest.

Grantees must become familiar with basic terms for financial management of funds such as:

* Cost accounting: The method by which costs incurred are allocated to grant programs by classification (i.e., type of expenditure)
* Allowability: Costs are necessary, reasonable, and allocable to the grant
* Allocability: The degree to which goods or services can be charged to a particular cost objective in accordance with the relative benefits received (Note: Grantees should create allocation schedules.)
* Applicable credits: Receipts or reductions in expenditures that offset or reduce direct or indirect cost items (i.e., program income, and/or discounts)
* Direct cost: A cost that is identified with and benefits a specific grant such as grant staff and grant supplies
* Indirect cost: A cost incurred for common or organization wide activities or services that benefit more than one grant program or project, such as rent and utilities (Note: See [34 CFR Part 76.563-569](https://www.ecfr.gov/current/title-34/part-76) for AE grants restrictions due to the statutory requirement to supplement not supplant.)
* Audit trail: Documentation that supports all grant related transactions

As required under [2 CFR Part 200.62](https://www.ecfr.gov/on/2017-01-03/title-2/subtitle-A/chapter-II/part-200/subpart-A/subject-group-ECFR2a6a0087862fd2c/section-200.62), grantees must have written financial management procedures in place that show sound internal controls over federal and state grant funds; assurance procedures for payment requests and payments; and federal and state award expenditures that can be compared to the award budget. The specific written procedures grantees must have in writing are:

* Allowable costs policy: How the grantee determines the costs charged to the grant are allowable and who is responsible for expenditures charged to the grant.
* Cash management: Drawdown process ensures funds maintained and funds drawn down by the grantee are for expenditures that have been incurred. Funds are only drawn down by authorized staff.
* Procurement: Federal procurement guidelines for community-based organizations, state regulations for state agencies, and federal and local regulations for towns, cities, and school districts.
* Travel
* Personnel policies: Policies applied to the grant should be consistently applied for all employees of the grantee.
* Inventory of assets and technology. Programs need to maintain a detailed list of all technology purchased with grant funds. Additionally, they need to inform ACLS when they have usable technology that they no longer need that could be used by other AE programs.
* Time and effort reporting: Time and effort for each employee charged to the grant for both full and split funded employees through timesheets, monthly and semi-certifications, and allocation schedules.
* Conflict of interest
* Budget process
* Records retention

#### Records Retention (State Requirement)

Grantees and subcontractors of DESE must abide by the [815 CMR 2.00: State grants, federal grant awards, federal subgrants and subsidies | Mass.gov](https://www.mass.gov/regulations/815-CMR-200-state-grants-federal-grant-awards-federal-subgrants-and-subsidies). This regulation requires that all DESE grant and subsidy recipients maintain all files, records, and documents related to the program. This includes all financial, program, and data records for seven years beginning on the first day of the final payment of the grant or such longer period as is necessary for resolution to any claims, litigation, negotiation, and or audit. Financial and data records must be made available for review by DESE upon request. Falsification of required documentation may trigger a data and/or fiscal monitoring review from DESE, conditions placed on current funding, or result in termination of the grant. Records may be retained in electronic format. However, the grantee is expected to establish formal procedures that address records management requirements, including recordkeeping requirements and disposition.

For guidance on establishing administrative controls, see [Electronic Records Management Guidelines (state.ma.us)](https://www.sec.state.ma.us/arc/arcpdf/Electronic_Records_Guidelines.pdf).

### Grants Accounting and Information System

Grantees must have an accounting system that enables them to develop and submit an annual budget that supports the services approved in the grant. The budget process must be in writing and reflect the requirements of the grant. Authorized personnel must submit grant budgets in [[GEM$](https://mass.egrantsmanagement.com/default.aspx?ccipSessionKey=638225092094851461)](https://mass.egrantsmanagement.com/default.aspx?ccipSessionKey=638225092094851461), the DESE [grants management system](http://www.doe.mass.edu/grants/essential.html), by the required deadlines. Failure to meet the specified deadlines may delay grant approvals.

### Supplement not Supplant

AE grants are NOT intended to support 100% of programs costs. Technically classified as restricted rate grants because they have the statutory requirement to supplement and not supplant (i.e., SNS) other federal, state, local, or private funding, AE funds cannot be used for costs that are assumed to be part of the agreement of the grant nor can they be used for costs previously funded with other funds available to the grantee. In other words, AE grant funds may not be used to pay for expenses that have been paid for by other federal, state, local, or private awards in the prior year or for costs assumed to be part of the determination of awarding funds to the grantee. The funds must be used as a supplement to an existing program.

This explains why grantees are expected to use existing resources to ensure the fiscal health of AE programs. For example, costs for rental of space including maintenance are assumed to be provided by the grantee when awarding the grant and therefore cannot be charged to the grant. Space attributed to the general administrative units of the grantee may be included as part of the indirect costs rate. However, the grantee must maintain records in determining indirect costs on file and have an approved indirect cost rate agreement from a federal cognizant agency or negotiate a rate with DESE. Please refer to [34 CFR Part 76.563-569](https://www.ecfr.gov/current/title-34/part-76) for further guidance.

### Match and Maintenance of Effort (State Requirement)

As per [2 CFR Part 200.306](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.306), ACLS requires that grantees provide a minimum of 20% of the total grant award as match or the amount contributed in the previous year, whichever is greater (i.e., the matching share committed in year one of a multi-year grant cycle cannot be reduced without written DESE approval).

This is referred to as maintenance of effort (MOE) and it applies to the full range of commitments grantees make in the first year of a funding cycle (e.g., director qualifications, space, technology). Specifically, the grantee is expected to provide some funding toward the direct services to the program for their match.

Only allowable program costs can be charged to match. As a result, indirect costs in excess of 8% cannot be recovered. (Note: Programs that have a DESE approved IDC rate of 8%, can claim a portion of that rate on the direct budget and a portion of that rate on match (e.g., 4% IDC on the direct budget and 4% IDC on the match budget). Programs that have a federally approved indirect cost (IDC) rate that exceeds the DESE approved IDC rate may not claim the difference between the 8% and the federally approved rate as match.

All matching funds and contributions must be directly related to the grant program. This includes cash and third-party in-kind contributions. These contributions must adhere to the requirements detailed in this chapter. Specifically, they must be verifiable, adequately supported with documentation, and approved in the program budget. Time and effort reporting for volunteers’ matching expenditures must adhere to the same reporting policies and procedures used for the grantees’ employees. The expenditures used as matching funds may not be included as contributions for or funded by any other federal award.

Examples of allowable matching or cost-sharing requirement criteria are:

* The value of the third-party in-kind contributions is applicable to the period to which the cost sharing or matching requirements apply.
* Valuation of donated services provided to a grantee or subgrantee by individuals must be valued at rates consistent with those ordinarily paid for similar work, in the grantee's or subgrantee's organization.
* Valuation of third party donated supplies and loaned equipment or space must be valued at rates consistent with those common in the area where the grantee provides services.

The source(s) of match funding must be documented, and the match funds must be an integral part of the approved program, recorded in the grantee’s financial management system for each grant, fully auditable, and demonstrative of the grantee’s capacity to provide self-sustaining fiscal and program operations. Examples of acceptable match requirements include but are not limited to:

* Classes supported by match funds. If a program meets the match requirement with classes, these classes and students must be entered into [LACES](https://laces.literacypro.com/laces/). (Note: The number of enrollments the program will be required to maintain will be the sum of seats in the DESE funded classes and the seats in the match funded classes. For example, if DESE funds 50 seats and match funds another 50 seats, the program will need to enroll and maintain 100 enrolled students during the period from September to June.
* Allowable costs incurred by the grantee, subgrantee, or a cost-type contractor under the assistance agreement.
* Personnel who provide volunteer instructional services (e.g., in class, one on one tutoring). Rates for volunteer services must be consistent with rates for similar work paid by the grantee. If required skills are not paid for by the grantee, rates must be consistent with those paid for similar work in the labor market. Fringe benefits that are reasonable, necessary, allocable, and allowable may be included in the valuation but only to the extent that they are included in the grantee’s personnel policies. Time of the volunteer services must be documented using the same time and effort reporting system used for employees of the grantee. DESE limits CALC and AECI matching contributions for volunteer time to 5% of the total grant award, not to exceed $24,000.
* Employees of other organizations.
* Space. Direct grant charges are only for rental space for approved satellite sites. All other space charges may only be considered as match (up to 10%). The amount charged to the grant must be limited to actual usage of the space by the AE program. The formula for determining match is the cost per sq. ft. used by the program (e.g., classrooms, office space) multiplied by the percentage of time the space is used by the program. If office space for general administrative organization wide services is included in the indirect cost calculation, it cannot be used as a match expense. Programs must request approval the of state administrator for any space cost charged directly to the grant before grant approval.

### General Grant Requirements

As the entity responsible for distributing AE grant funds and monitoring their use, DESE monitors grantee adherence to applicable state and federal requirements. Documentation and information collected for this purpose includes but is not limited to:

* Statement of Assurances (SOA): Each year an authorized signatory of the grantee must submit a signed SOA that assures compliance to DESE policies. The failure of a grantee to demonstrate compliance with the policy requirements in the [*Massachusetts Policies for Effective Adult Education in Community Adult Learning Centers and Correctional Institutions*](http://www.doe.mass.edu/acls/abeprogram/) and in subsequent policy updates throughout the year will have consequences, including but not limited to corrective action, withholding of funds, grant reduction, or grant termination. By signing the SOA, the signatory is assuring DESE that the organization is aware of and will comply with all grant requirements and governing fiscal and data regulations.
* Risk Management: [2 CFR Part 200.205](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1205&rgn=div8) requires that DESE assess the risk of grant recipients in order to identify fiscal and programmatic conditions that could put federal and state funds at risk and, based on the results of the risk assessment, develop monitoring plans**.** ACLS will continually assess program risk using a risk analysis rubric that incorporates a range of fiscal and data indicators including single audit findings, fiscal monitoring review findings, unspent funds, grant to agency budget ratio, MSG, timeliness of data entry, data accuracy, and post-test rates. Mitigation could involve training and technical assistance, additional site reviews including fiscal and data audits, stops on grant payments, and grant reduction or termination.
* Financial Audit Requirement: All grantees that are community-based organizations (CBOs) are required to annually submit to ACLS an electronic copy of their organization’s latest non-single audit report issued by an independent CPA. The audit should be sent to ACLSFinancialAudit@mass.gov and submitted no later than nine months after the program’s fiscal year ends with a Cc to the program’s assigned Program Specialist. The report should include financial statements and a Management Letter. The costs of the non-single audits are not an allowable expense to the grant as per [2 CFR Part 200.425](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1425&rgn=div8).
* As per [2 CFR 200.501](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F/subject-group-ECFRfd0932e473d10ba/section-200.501), entities that aggregately expend $750,000 or more in federal funding are required to have a Single Audit (SA) that reviews internal controls and compliance to grant requirements. These audits must be submitted by the program’s CPA into the Federal Clearing House nine months after the program’s fiscal year ends. The cost of an audit is an allowable cost; however, it must be allocated proportionately to all funding sources. The Audit & Compliance Unit (A&C) of DESE will follow up on any SA that results in findings. A corrective action plan will be required along with supporting documentation on the corrective measures taken by the organization.
* Time and effort records must support payrolls and time distribution records must support salaries and wages of employees for both full time staff and/or staff working on more than one grant or cost center. Grantees must have written policies and procedures on how the account for staff is charged to the grant including salaries and in-kind services used as matching funds. Grantees should become familiar with [2 CFR Part 200.318](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1), document time and effort in payroll records, ensure that they comply with the approved budget, and keep supporting documentation for time and effort reporting. This requirement also pertains to matching funds.
* Time and effort documentation is important and a requirement as per [2 CFR Part 200.430](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1430&rgn=div8). The grantee must have written time and effort reporting procedures that reflect the grantee’s written personnel policies. Payroll systems must be based on records that accurately reflect the work performed and supported by a system of internal controls that provides reasonable assurances that charges are accurate, allowable, reasonable, and properly allocated. Payroll distribution records must be incorporated into the grantee’s official records and reasonably reflect employees’ total activity. Additionally, records need to support the distribution of salary or wages across specific activities or cost objectives if an employee works on more than one grant or activity. Time and effort reporting documentation requirements also apply to salaries counted as match.
* A reasonable method of tracking time and effort must be employed. Estimates may be used, however, reconciliation to actual time worked and charged (i.e., planned versus actual) must occur on a regular basis. Time worked, level of effort, and dollars charged are not independent of each other. They are linked and methodologies for tracking, reporting, and the internal controls in place need to be part of the documentation associated with personnel charges to DESE grants.

### Essential Budget Information

Adult education grantees must be familiar with GEM$, the DESE [grants management system](http://www.doe.mass.edu/grants/essential.html), and use official grants management forms and/or ACLS required forms as identified in individual Requests for Proposals (RFPs). They must also meet submission deadlines and abide by rules related to administrative costs including the rule that all fiscal requirements that apply to DESE grant funds apply to match funds.

As defined by AEFLA and [34 CFR Part 463, Subpart C (463.25, and 463.26),](https://ecfr.io/Title-34/cfr463_main) not less than 95 percent of funds must be spent on AE direct services and literacy activities. As a result, not more than five percent of the funds may be spent on administrative costs. Grantees may negotiate with DESE on an individual basis to determine an adequate level of funds for non-instructional purposes by submitting a written request and rationale with their annual continuation applications. Administrative costs must be reasonable, necessary, and allocable.

AEFLA defines administrative costs as allowable costs related to planning, administration (including carrying out performance accountability requirements), professional development, providing AE and literacy services in alignment with local workforce plans, carrying out one-stop partner responsibilities, and state approved IDC charged to the grant. (Note: Approved IDC is part of the grantee’s administrative cost.)

[AEFLA Sec. 233](https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf) states that professional development expenses are administrative expenses and part of the five percent limit. DESE has further defined administrative professional development expenses to include non-SABES registration fees and travel expenses including out of state travel. SABES trainings and the annual MCAE Network conference are defined by DESE as instructional expenses.

#### Budget Information

Allowable costs must be directly attributable to the project and documented. For example, job descriptions and organization charts must be maintained for all employees charged to the grant for both direct and indirect costs. The job descriptions and organizational charts should be in line with the duties performed on the grant and through the grantee’s organization. Job descriptions should also be maintained for services performed as match (e.g., volunteer and other salaries included as match for the grant). Grantees should contact their assigned PS if they need assistance with budgets.

#### Student Stipends

Student stipends are an allowable expense but may not be used to pay students to participate in programming. As this work is not instructional, it is administrative and will be included in administrative costs. Programs that pay stipends to students must:

* Maintain job descriptions for all jobs for which students are paid;
* Enter into contracts with the students and renew them annually; and
* Document the time and effort of these students.

#### Requests for Funds

Grantees must monitor monthly expenditures carefully and draw down funds only as needed to ensure that state and federal funds are expended on a consistent, timely basis, and in full by the close of each fiscal year. The grantee must have a written cash management policy to ensure funds are only drawn down as needed and expended in a reasonable amount of time. The grantee must have an interest policy for funds held longer than a reasonable time. All DESE grant drawdowns are processed online using GEM$, the DESE [grants management system](http://www.doe.mass.edu/grants/essential.html). (Note: State agencies and correctional facilities are set up to use their funds with an account in MMARS via an Interagency Service Agreement (ISA).) Grantees should not draw down funds if expenditures have not occurred.

It is important to develop cash management policies and procedures that include monitoring budget versus actual expenditures, and cash on hand. Communication between program staff and fiscal staff on a monthly basis will allow the grantee to apply for amendments if needed and avoid disallowance of expenditures. Costs incurred and charged must only be for allowable costs as approved in the budget.

### Amendments

Grant amendments are required when there is:

* A significant change in program objectives, personnel and/or scope of services for the grant;
* An increase or decrease in the total amount of the grant; or
* A line item change that exceeds $100 or 10% of the line, whichever is greater, or exceeds $10,000 must be approved by DESE program staff.

When an amendment is required, the program must consult with its assigned PS for preapproval of the proposed change.

To allow time for amendments to be processed, programs must submit amendments at least 30 days prior to the desired change and/or 30 days before the end of the fiscal year. Communication between program and fiscal staff on a consistent basis and the use of budget versus actual reports to monitor the grant will prevent any disallowance of expenditures by DESE.

### Unexpended Funds

Grantees must monitor expenses on all grants to ensure that funds are used within the approved project period of the grant.

* Grant funds MUST be obligated by the grant end date.
* Goods/services MUST be received by the grant end date.
* Applicants have 60 days to finalize/pay invoices for obligations incurred by the grant end date.

Unexpended funds above $1.00 must be returned with the final financial report each year. The financial report must be filed 60 days after the close of the grant. Expenditures reported on the final report must be supported in the grantees’ accounting records. The accounting system accounts should mirror the grant budget lines, or the grantee must maintain a crosswalk that links the accounts on the accounting system to the grant budget lines. DESE recommends that grantees maintain supporting documentation to support all final reports submitted.

Grantees must notify their program specialist (PS) by April 15 annually if funds may be unspent, including funds assigned to subcontractors, so that grant funds can be reallocated. Returned and unspent funds are indicators of risk and will be recorded in the risk analysis. Grantees that repeatedly return funds may have their subsequent award reduced by the amount of the funds returned and may not be eligible for increases offered during the following year.

#### Condition of Funding

As a condition of accepting DESE funding, grantees commit to identifying ACLS as the entity supporting the delivery of AE services at the program in official correspondence. Grantees additionally agree that DESE will have the right to publish and distribute any materials developed with grant funds.

### Data Quality and Integrity

When grantees submit a Statement of Assurances signed by the authorized signatory of the grantee, they are assuring ACLS of the accuracy of the information in their grant applications (i.e., competitive and continuation) and all grant related documentation. Grantees will be required to provide financial and data records as requested with the understanding that falsification of required documentation may trigger a data audit and/or fiscal audit or result in termination of the grant. In addition to submitting accurate data, grantees must meet deadlines for data submission.

#### Data Quality Checklist (DQC)

ACLS requires that programs submit a data quality checklist annually with their continuation applications submitted in GEM$. The checklist assures ACLS that all participant and staff records in [LACES](https://laces.literacypro.com/laces/), including attendance and assessments are accurate, complete, and up to date. The checklist also includes assurances that the program adheres to ACLS assessment policies and procedures, conducts post-exit follow-up, and maintains an accurate and up-to-date waitlist. Failure to maintain accurate data in [LACES](https://laces.literacypro.com/laces/) could result in a conditional funding status or a loss of funding if not corrected by the grantee.

#### Confidentiality (State Requirement)

ACLS requires that confidential student records be kept in locked files and/or in password protected databases. Students’ education records, including student data in [LACES](https://laces.literacypro.com/laces/) and records regarding students’ disabilities, are to be treated with the same confidentiality as medical records. ACLS requires that programs protect the privacy of students’ education records and seek consent for any disclosure of personally identifiable information (PII) in students’ education records. (Note: Students entrust programs with PII. Toward protecting it, ACLS requires that all users of the state information management system ([LACES](https://laces.literacypro.com/laces/)) have unique logon credentials. Programs must immediately deactivate [LACES](https://laces.literacypro.com/laces/) accounts for users who leave the program.)

### Data Entry

All data, including intakes, assessment, student attendance, and other required information must be entered into [LACES](https://laces.literacypro.com/laces/) in a timely manner on a fixed, regular schedule. Grantees must be able to corroborate [LACES](https://laces.literacypro.com/laces/) data with program records in their files. Grantees that routinely lag in data entry will not have an accurate picture of their current performance. Routine lags in data entry may trigger a data and/or fiscal audit. ACLS requires grantees to:

* Ensure that all [LACES](https://laces.literacypro.com/laces/) users, including teachers, have unique logon credentials.
* Have written data collection and entry policies and procedures, including identification of the person or persons responsible for data collection, entry, and quality review.
* Enroll all students in [LACES](https://laces.literacypro.com/laces/) even if they do not attend 12 hours.
* Enter attendance at the daily level. That is, attendance must be recorded for each day that a student attends.
* Enter attendance within one week and recommends the best practice of entering attendance every day during class.
* Enroll students in class in [LACES](https://laces.literacypro.com/laces/) within one week of starting and recommends enrolling students before they start to ensure that teachers have up-to-date rosters and can enter attendance on the first day.
* Enter [NRS](https://nrsweb.org/) assessment scores within four weeks of administration.
* Maintain supporting documentation for all [LACES](https://laces.literacypro.com/laces/) data, including attendance except when teachers enter attendance during class.

#### Attendance

For reporting purposes, ACLS counts the following as attendance:

* The time that a student is physically present in class on the date and at the time of scheduled classes (i.e., F2F classroom attendance);
* The time that a student is present virtually in class on the date and at the time of scheduled classes (i.e., virtual F2F classroom attendance);
* One on one volunteer tutoring time outside of scheduled classes; and
* Proxy seat time (i.e., clock time model); and teacher verification model.

#### Desk Reviews

The U.S. Departments of Labor and Education hold states accountable for WIOA performance and, as per WIOA legislation, sanction states that fall short of state performance requirements. Similarly, DESE collects grantee performance data and uses it to monitor grantee performance, thus ensuring that students receive the best services possible. ACLS uses desk reviews to ensure and improve the quality of data collection in [LACES](https://laces.literacypro.com/laces/).

On a schedule announced by ACLS annually, programs are required to schedule desk review meetings of their [LACES](https://laces.literacypro.com/laces/) data with their assigned program specialist. The purpose of those meetings is to discuss the data, identify program strengths, and map out steps to correct any areas of concern. Programs are strongly encouraged to use these searches throughout the program year to assess their performance.

For more information on desk reviews, see <https://www.doe.mass.edu/acls/accountability/compliance/tools/desk-review.html>

#### Follow-up for Federal WIOA Measures

The [NRS](https://nrsweb.org/) requires states to track WIOA required outcomes (e.g., employment, obtaining a high school equivalency credential, entry into postsecondary education or training). Students who have not participated for 90 days are officially exited from the program and become part of a follow-up cohort.

Programs must conduct post-exit follow-up for students in these cohorts, even for students who return to the program later in the year, and use Table 5 in [LACES](https://laces.literacypro.com/laces/) to report on WIOA post-exit employment indicators (i.e., second quarter employment, fourth quarter employment, and second quarter median earnings).

For more information on accountability and the [NRS](https://nrsweb.org/), see <https://www.doe.mass.edu/acls/accountability/outcomes/> and the [NRS website](http://www.nrsweb.org/).

#### Waitlist (State Requirement)

ACLS requires that programs:

* Maintain an active waitlist for applicants who are unable to enroll in instructional classes due to capacity constraints;
* Have a written waitlist policy that is shared with all applicants. The policy must include the conditions under which a person is removed from the waitlist;
* Contact or attempt to contact all applicants (i.e., everyone with an overall status of waitlist) at least twice per year to determine whether they are still interested in services. (Note: Using the email and text message feature in [LACES](https://laces.literacypro.com/laces/) will simplify compliance with this requirement.);
* Record all efforts to contact and enroll applicants using the waitlist contact history;
* Remove applicants from the waitlist (i.e., change the overall status to “Removed from Waitlist”) who cannot be contacted or are no longer interested in services;
* Complete the full [LACES](https://laces.literacypro.com/laces/) intake as soon as possible; and
* Certify in the annual Data Quality Checklist (DQC) that the waitlist is accurate and up to date. The DQC is required as part of the annual continuation application.

Appendices

## Appendix A: Guidelines for Memoranda of Agreement (MOA)

The memorandum of agreement (MOA) is a written document describing the agreement between the grantee and a subcontractor working together to deliver services. The purpose of the MOA is to formalize and clarify the expectations of the grantee and partnering program.

All parties must commit to fulfilling the requirements outlined in the signed Statement of Assurances and the requirements set forth in the *Massachusetts Policies for Effective Adult Education*. The MOA must be revisited annually: one original must be signed and dated by all partners and submitted to ACLS with the program’s annual continuation application; however, with approval from the ACLS Program Specialist, the MOA may be updated at any time through written agreement of each partner.

The grantee is legally responsible for effective management of the entire grant, including any funds committed to a partner to purchase student services. The grantee is responsible for having appropriate accounting systems in place to monitor contractual services and ensure that all grant funds are fully expended as articulated in the MOA and in a timely manner. The grantee is required to notify ACLS as soon as possible if funds may be unspent, including funds assigned to a partner. If the grantee anticipates that there will be unexpended funds by any partner, the grantee will be asked to amend the grant as soon as possible so that the funds can be reallocated.

Required components of the MOA include an articulation of the following:

* Purpose of the MOA
* Description of the roles and responsibilities of staff of each partnering organization
* If the partner is offering instructional services, a detailed description of those services (number and type of classes) as reflected in the program’s program plan
* Description of the scope of work, including expected results
* Duration of agreement articulating the beginning and end date
* Financial obligations of each partner, (e.g., contracted partner understands that lead agency must be provided with an expenditure report a minimum of three times per year and must submit invoices monthly)
* Assurance that contracted partner will notify the grantee and ACLS as soon as possible of any funds anticipated to be unexpended by the close of the grant period. (This early notification and return of unexpended funds allow ACLS sufficient time to reallocate those funds.)
* Description of the accounting systems the grantee will use to monitor contractual services and ensure that all grant funds are fully expended as articulated in the MOA and in a timely manner
* Assurance that the grantee understands that it is required to report and return to the state any and all funds unexpended by the close of the grant period, whether or not it recovers Unexpended contracted funds from contracted partners
* Schedule for review of MOA at a minimum three times per year: beginning, midyear, and end of year
* Articulation of grounds for termination of the MOA, for example:

*“This agreement may be terminated by either of the partners upon written notice delivered to the other party at least 30 days prior to intended date of termination. The grantee must terminate the agreement with the partner organization if its activities are not delivered as described in the MOA. The partner organization will be paid by the grantee for only the portion of the work completed.”*

Other examples of components for MOA include the following:

* Referral of students from one program to another;
* Shared customers;
* Description of any data management requirements including timeliness of data entry;
* Referral of tutors to grantee;
* Review of data for planning purposes; and
* Responsibility to review ACLS mailings and comply with policy changes.

## Appendix B: Distance Education

**Types of Distance Learning – Instruction**

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|  **Types of Distance Learning – Instruction**  |
| **Instruction Type** | **Definition** | **Example** |
| **Instruction – Distance Learning (Virtual F2F)** | Students and instructors are present at the same time and able to see one another in real time but are not present at the same location. | Direct instruction using ZOOM, SKYPE, cellphone, or any other platform which includes video for the instructor and students. |
| **Instruction – Distance Learning (Proxy Hours)** | The time a student spends working asynchronously, independent of direct instruction, using any of the three Proxy Hour models below. | Time spent using an online product which tracks seat time or working on teacher assigned learning activities. |

**Creating Distance Education Classes in LACES**

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| **Distance Education Classes in LACES** |
| **Delivery Option** | **Instruction** | **Components** | **Class Service Type in LACES** | **Instructional Hours in LACES**  |
| Synchronous Distance Education | In Real Time | Online Synchronous | ABE or ESOL | Instruction – Distance Learning (Virtual F2F) |
| Asynchronous Distance Education | Can be viewed at a time convenient to the learner | Asynchronous | ABE or ESOL | Instruction – Distance Learning (Proxy Hours) |
| Blended Distance Education | Includes Real Time Instruction and Instruction which can be viewed at a time convenient to the learner | Online Synchronous and Asynchronous | ABE or ESOL | Instruction – Distance Learning (Virtual F2F) ***and*** Instruction – Distance Learning (Proxy Hours) |
| Hybrid: In-Person Face-to-Face and Online Synchronous | In Person instruction and In Real Time Online Instruction | In Person and Online Synchronous | ABE or ESOL | Instruction ***and*** Instruction – Distance Learning (Virtual F2F) |
| Hybrid: In- Person Face-to-Face and Online Asynchronous | In Person Instruction and Instruction which can be viewed at a time convenient to the learner | In Person and Asynchronous | ABE or ESOL | Instruction ***and*** Instruction – Distance Learning (Proxy Hours) |

**Understanding Proxy Hours**

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| **Proxy Hours**  |
| **Type** | **Definition** | **Example** |
| **Clock Time/Time on Task** | Time reported based on time a student is engaged with an online product that tracks actual time on task.Programs can add 15 minutes of time per hour time to proxy hours for student and staff time that is not logged accounted for by clock time/time-on-task. | The amount of time that the student spends working in an on-line product (e.g., AZTEC, ENGEN, KET, USA Learns) as tracked by that product. |
| **Learner Mastery** | Assigns a fixed number of proxy hours based on verified learner mastery of instructional content. | Student completes a unit which is assigned a number of proxy hours granted upon verified mastery of the material; usually determined by a summative assessment of the material completed. |
| **Teacher Verification Model**Student Engagement with specific Learning Activities assigned by Instructor | Prior to distribution of educational material, teacher assigns the amount of time (proxy hours) awarded to students upon completion of material and verification of learning.Pre-assigned proxy hours include all activity (student work and student-teacher engagement).The recording of hours in LACES presumes teacher verification that material was completed and assessed for mastery of content. | Learning Activities are given to students, students complete work and return learning activities to instructor who reviews and assesses mastery of content.Assigned proxy hours include but are not limited to student work, phone follow up with teacher, exchange between student and teacher via texts or email. |

**Requirements for Reporting Distance Education Data in LACES**

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| **Distance Education Data Entry Policy** |
| **Instruction – Distance Learning (Virtual)** | Attendance should be entered in LACES daily (as with in-person attendance) within one week of the instruction. |
| **Instruction – Distance Learning (Proxy Hours)** | Proxy Hours should be captured a minimum of two times per month. The first entry should be on the 16th of the month capturing all hours from the 1st to the 15th of the month, and the second on the last day of the month capturing hours from the 16th of the month through the last day of the month. |
| **Intake and Assessment** | Programs may capture intake, orientation, and assessment hours in LACES as they do with in-person intake and assessment. For further information regarding assessment of Distance Learners, see Chapter 5. |

For more information on DE curriculum and instruction, see Chapter 4 and Chapter 5.

## Appendix C: Sample Calendar for Educational Leaders

The sample calendars on this page and the next summarize key practices of educational leaders that can serve as the basis of a master calendar for the program year.

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| **Ongoing**With exception of the italicized time-sensitive tasks, tasks in this ongoing calendar can be adapted to fit individual program needs. |
| Programming and Staffing* Communicate with ACLS-assigned program specialist (PS)
* Review ACLS monthly mailings and participate in State as Partner and ACLS webinars
* Review the [*Indicators of Program Quality*](https://www.doe.mass.edu/acls/accountability/program-quality/)(IPQs) and use to inform planning with staff
* Review qualitative and quantitative data and use to inform planning with staff
* Review program curriculum with an ADEI lens, monitor implementation, and revise as needed
* Engage all stakeholders in a systemic continuous improvement planning process
* Provide common planning time to instructional staff
* Conduct classroom walkthroughs (if applicable)
* Conduct classroom observations as per ACLS policy and give timely feedback to staff
* Schedule peer observations for teachers
* Monitor and support staff PD goals and activities, particularly as they relate to the program’s continuous improvement goals
* Revisit continuous improvement goals and revise based on data and emerging needs
* Prepare for Program Quality Review or site visit with staff as per ACLS annual schedule
* Work with WIOA core partners, Transition to College, postsecondary providers, and local partners regarding students’ next steps
* Work with local businesses and community service providers (e.g., invite them to speak to and/or hire students)
* Work with outstationed staff to support two-way referrals between AE and career centers

Students* Recruit, intake, and orient students; review student handbook with students
* Recruit, intake, and orient new students as needed to maintain funded enrollment
* Monitor student outcomes, particularly post-tests and follow-up**\***(Note: Follow-up reports are generated quarterly, but follow-up work at least monthly is recommended.)
* Ensure advising is available to students; help students connect with community support services as needed

Fiscal and Data* Ensure timely and accurate data entry in LACES; update program contact information
* Stay current with requests for funds
* Monitor fiscal status
* *Submit audits annually as required by ACLS policy*
 |
| **\*** ACLS encourages programs to establish procedures that ensure:* Follow-up reports are reviewed regularly;
* Students are informed that programs will be contacting them post-exit;
* Staff time is strategically scheduled to contact students; and
* Multiple follow-up strategies are used (e.g., phone, email, social media).
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| **Month by Month**This calendar shows tasks educational leaders undertake month by month. Italicized tasks are time sensitive. |
| **July** | * Update staff and student handbooks as needed
* Update job descriptions as needed
* Recruit for open positions as needed
* *Complete LACES data entry for the previous year*
* Roll over student post-tests done after April for use as pre-tests
 |
| **August** | * Begin staff orientation
 |
| **September** | * *Begin student pre-testing in BEST Plus 2.0, MAPT, TABE 11/12, CLAS-E*
* Ensure staff participates in PD based on student outcome data, their personal PD needs, program needs, and PD offerings from [SABES](http://www.sabes.org/), [LINCS](https://lincs.ed.gov/), [NELRC](http://www.nelrc.org/), and other high quality PD providers
* Review emergency evacuation plan and procedures with staff and students
* Conduct technology bootcamp to ensure new students are prepared for remote learning
 |
| **October** | * *Review state-assigned Measurable Skills Gain (MSG) target*
* Schedule annual staff observations and evaluations
* Schedule peer observations for teachers
 |
| **November** | * Celebrate National Family Literacy Month
 |
| **December** | * *Submit waitlist verification (Note: This is an annual requirement verified in the DQC submitted with the annual continuation application.)*
* Prepare for second semester (if applicable)
 |
| **January** | * Conduct formal classroom observations (at a minimum annually)
* Conduct mid-year student post-testing (optional)
* Review financial expenditures to determine if funds will not be expended during current fiscal year; notify PS if budget amendment if needed
 |
| **February** | * Submit budget amendment if needed
* *Submit assessment recertifications for Best Plus 2.0*
 |
| **March** | * Begin planning for continuation funding and changes in program design
* Begin organizing documents needed for refunding
* *Submit assessment recertifications for CLAS-E Writing*
* Submit budget amendments for increases and decreases (deadline)
 |
| **April** | * Develop schedule for student post-testing and begin post-testing
 |
| **May** | * Attend annual Directors’ Meeting
* Attend MCAE Network conference
* Submit budget amendments (deadline)
 |
| **June** | * *Complete continuation applications for approval*
* *Close out the fiscal year in LACES*
* *Start working on final fiscal report*
* *Ensure all students have been post-tested by 6/30*
* Celebrate student, staff, and program successes
 |

1. ACLS is a unit of the [Department of Elementary and Secondary Education](https://www.doe.mass.edu/) (DESE). [↑](#footnote-ref-2)
2. Programs that do not offer instruction each month from September through June must seek a waiver by sending an email request to the state administrator. [↑](#footnote-ref-3)
3. [LACES](https://laces.literacypro.com/laces/) is the ACLS data collection platform. [↑](#footnote-ref-4)
4. [*Persistence: Helping Adult Education Students Reach Their Goals*](http://www.ncsall.net/fileadmin/resources/ann_rev/comings-02.pdf) notes that “Program participation of 100 hours or even 150 hours … is probably inadequate for most adult education students to reach their learning goals.” Comings. (2007) [↑](#footnote-ref-5)
5. The terms distance education and distance learning are often used synonymously. [↑](#footnote-ref-6)
6. Distance Education Tips can be found at [NRS Technical Assistance (TA) Guide](https://nrsweb.org/policy-data/nrs-ta-guide). [↑](#footnote-ref-7)
7. ACLS funds transition grants for community colleges with which AE programs partner to ensure successful transition of adult students into postsecondary education. [↑](#footnote-ref-8)
8. Family literacy services support the educational and skill achievement of parents and family members to participate in the educational development of their children and improve economic opportunities for families. Family literacy services include but are not limited to interactive literacy activities, parenting education, and workshops and events for parents, family members, and their children. [↑](#footnote-ref-9)
9. Literacy Volunteers of Massachusetts (LVM) provides AE services to eligible adults who cannot or will not enroll in class-based instructional services at a Community Adult Learning Center. For more information on LVM, see <http://www.lvm.org/>. [↑](#footnote-ref-10)
10. Programs must do follow-up when the student does not provide a social security number. [↑](#footnote-ref-11)
11. Adapted from [*The Glossary of Education Reform*](http://edglossary.org/curriculum/). [↑](#footnote-ref-12)
12. For English learners receiving mathematics instruction. [↑](#footnote-ref-13)
13. Western Sydney University

<https://www.westernsydney.edu.au/studysmart/home/study_skills_guides/digital_literacy/what_is_digital_literacy> [↑](#footnote-ref-14)
14. For more information, see the [Western Sydney University](https://www.westernsydney.edu.au/studysmart/home/study_skills_guides/digital_literacy/what_is_digital_literacy.) definition of digital literacy. [↑](#footnote-ref-15)
15. Adapted from [*The Glossary of Education Reform*](http://edglossary.org/curriculum/). [↑](#footnote-ref-16)
16. Adapted from [*The Glossary of Education Reform*](http://edglossary.org/curriculum/). [↑](#footnote-ref-17)
17. DeSousa, D.J. (2005). *On course: Strategies for creating success in college and in life* (4th ed.). Boston: Houghton Mifflin Company. [↑](#footnote-ref-18)
18. Light, R. (2001). *Making the most of college*. Cambridge, MA: Harvard University Press. [↑](#footnote-ref-19)
19. 22 is the maximum age limit to which free education must be offered. [↑](#footnote-ref-20)
20. Chapters 1 through 9 focus on adult education and federal WIOA requirements. Chapter 10 focuses on additional requirements that are the purview of the Department of Elementary and Secondary Education (DESE), the state education agency. [↑](#footnote-ref-21)
21. The U.S. Department of Education policy on a subaward states that grantees must exclude the amount of each subaward costs exceeding $25,000 per subaward on a yearly basis. Therefore, indirect costs can only be recovered on the first $25,000 expended each year for each subaward. Expenditures of the subaward will not be allowed if the subaward has not been approved by DESE. [↑](#footnote-ref-22)