Massachusetts Guidelines for Effective ABE Transition to Community College FY 2015
Massachusetts Department of Elementary & Secondary Education
Adult and Community Learning Services

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Welcome to the Massachusetts Adult Basic Education System

The Massachusetts Adult Basic Education (ABE) System is comprised of approximately one hundred local provider agencies housed in community adult learning centers, local school districts, community colleges, libraries, correctional facilities, and statewide and regional volunteer associations, as well as their staff and students, and the Department of Elementary and Secondary Education (ESE, the state agency authorized to administer federal and state adult education funds); a professional development system; and by representative groups such as the ABE Directors Council and other stakeholder groups and committees.

Together, these individual but interrelated entities work together to create a strong, unified, and effective educational system for the approximately twenty thousand adult learners it serves. By accepting a state- or federally-funded Adult Basic Education Grant from the Department of Elementary and Secondary Education, you become part of that system.

The ABE Transition to Community College grant program is the final step in the Massachusetts ABE system that begins with basic literacy and/or the inability to speak or understand English, and that ends with transition to next steps, including post-secondary education and careers.

For more information about the Massachusetts ABE system, refer to the introduction in the Massachusetts Guidelines for Adult Basic Education for Community Adult Learning Centers and ABE Programs in Correctional Institutions, posted to the ACLS Program Management page at http://www.doe.mass.edu/acls/abeprogram/.

The Massachusetts ABE system is guided by a mission statement adopted by the state board of education, and three strategic goals that were developed over several years through extensive input from and dialogue with practitioners and other stakeholders:

The Massachusetts ABE system exists to provide each and every adult with opportunities to develop literacy skills needed to qualify for further education, job training, and better employment, and to reach his/her full potential as a family member, productive worker, and citizen.

-- Mission statement adopted by the Massachusetts Board of Education, 1993
Goals of the Massachusetts ABE System

Ensure That Adults Needing Basic Education Have Access to Services

*The Massachusetts ABE system will*
- increase program intensity and student seats for adults wanting to improve their education,
- provide additional support for programs reaching diverse populations, and
- expand service delivery options.

Increase System Effectiveness and Quality

*The Massachusetts ABE system will*
- continue to build a standards-based service system,
- increase regulatory flexibility to enable programs to meet local and regional needs, and
- seek opportunities to support innovative programming that better serves adult learners.

Prepare Students for Success in Their Next Steps: In College and Further Training, at Work, and in the Community

*The Massachusetts ABE system will*
- strengthen and contextualize student-centered curriculum,
- expand student access to support services, and
- ensure that students gain the academic skills needed to succeed in their next steps.

- *Facing the Future: Massachusetts Strategic Framework for Adult Basic Education, 2010*

For more information about these goals and the public priorities that adult basic education supports, see *Facing the Future: Massachusetts Strategic Framework for Adult Basic Education*.¹

**Purpose of the Massachusetts ABE Transition to Community College Program**

The purpose of this Department of Elementary and Secondary Education (ESE) grant program is to provide a foundation of services within Massachusetts community colleges that enable students enrolled in the State's Adult Basic Education system to transition into and ultimately complete postsecondary education.

**The Role of the Community College**

Community colleges that are funded to implement an ABE Transition to Community College program are required to:

- Integrate the ABE Transition to Community College Program ("Transition Program") into the college and provide it with financial and other supports (e.g., access to degree-bearing college credit courses for Transition students and all college resources at no cost);

- Integrate both students and staff of the Transition Program into the mainstream of the college’s activities, functions, and community;

¹ [http://www.doe.mass.edu/acls/sp/FacingTheFuture.pdf](http://www.doe.mass.edu/acls/sp/FacingTheFuture.pdf)

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• Provide appropriate space for the Transition Program components (e.g., advising, courses and workshops, computerized assessments, program administration); and,

• Maintain a current, formal, detailed Memorandum of Agreement (MOA) with at least one ESE-funded ABE program partner and maintain current, formal Memoranda of Agreement (MOA) with all ABE programs in the college’s catchment area to facilitate the successful transition of former ABE students to the community college. See Appendix B for ACLS’ FY 2015 Guidelines for Memoranda of Agreement (MOA) Between ABE Grant Recipients and Partnering Organizations.

Pre-enrollment

Student Outreach and Recruitment

Transition Programs are encouraged to employ a variety of outreach and recruitment strategies so that potential students, especially students from ESE-funded ABE programs, are aware of the program’s services and can benefit from these services in an effort to meet their college and career goals.

Collaboration with ESE-Funded ABE Programs

Transition Programs are required to collaborate with ESE-funded ABE programs to facilitate the successful transition of former ABE students to the community college.

Student Eligibility

Transition Programs should adhere to the community college policies around student eligibility when determining the eligibility of prospective students.

Intake, Initial Assessment, Orientation, & Placement

Transition Programs are required to have an effective process in place for conducting student intake and orientation. Early on in this process, programs are encouraged to give students key preliminary program information, including program completion requirements, so that students can make an informed decision about whether they want and are able to pursue participation in the program and the college.

Programs will use the college placement test (i.e., the Accuplacer) as the initial assessment to determine students’ math, reading and writing skills, and identify appropriate subsequent course placement. Programs are encouraged to offer or recommend Accuplacer test preparation services to prospective Transition students in order to reduce student test anxiety and obtain test results that accurately reflect students’ skills and abilities.

If Accuplacer scores indicate a student’s placement in the lowest level of the college’s reading or math developmental education courses, the program is encouraged to identify or create alternative instructional options, at no cost to the student, that will enable the student to increase his or her academic skills without having to use grant or personal funds. These instructional options could include academic skill development courses offered by the program and/or a partnering ESE-funded ABE program.
Prior to a student’s placement in the program, the student will need to fully understand and have realistic expectations about the requirements and benefits of the program. Topics covered should include college course offerings, career planning, the required time commitment, and the costs associated with the student reaching his or her education and career goals. Potential barriers to participation will need to be identified and addressed, to the extent possible.

When considering a student for placement, the program should use all relevant and appropriate student information so that the student will be ready, upon completion of the program, for enrollment in credit-bearing courses. Recommended sources of student information include Accuplacer test results, MAPT history, student history, and/or teacher recommendations.

**Requirement to Request a Social Security Number at Intake**

In order for Massachusetts to meet federal requirements, it must ascertain student goal achievements, and recipients of ABE grants must assist with this requirement. Because data matching is considered to be the most valid data, Massachusetts uses data matching to follow up on goals to the fullest extent possible. Data matching works by pairing records from different databases for the same student using a common identifier—a Social Security number. Consequently, a valid Social Security number is needed for all students whose data is in the data matching pool. The ACLS SMARTT Intake form provides a place to capture the student's Social Security number and a check-off box to note whether the student signed a Release of Information form.

Prior to enrollment, programs are required to ask each student in a neutral manner to provide her or his Social Security number and sign a Release of Information form for the purpose of facilitating access to appropriate additional and subsequent services and for follow-up on student outcomes.

## Enrollment

### Enrollment Requirements

Recipients of ESE *Adult Basic Education Transition to Community College* grants will be required to maintain a minimum enrollment of 15 ESE-funded students per semester, no less than 80% of whom will be former (or current) ESE-funded adult basic education (ABE) students, as verified by a SMARTT identification number. Enrollment is defined as participation in at least one of the following:

- Either of the two required Transition courses (i.e., *College for Success, Technology for College*)
- Ongoing advising

Enrollment is verified by attendance in SMARTT by participation in at least one of the above program components.

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2 “SMARTT” refers to the Department's web-based planning and reporting System for Managing Accountability and Results Through Technology for Adult Basic Education, or SMARTT ABE. See [http://www.doe.mass.edu/acls/smartt/](http://www.doe.mass.edu/acls/smartt/)
Programs must also offer, in collaboration with the college, degree-bearing college credit courses at no cost to students enrolled in the Transition program.

Further, grant recipients are required where appropriate to collaborate with college programs similar to Transition programs (e.g., TRIO, Transformation Agenda) in an effort to reciprocate services and resources.

**Dual Enrollment**

Enrollment in a Transition program is also an option for students currently enrolled in ESE-funded ABE programs as long as the following criteria have been met:

- Students have an identified goal of attending postsecondary education;
- Students’ academic levels as determined by Accuplacer score results, are appropriate for enrollment in the Transition program;
- Students can maintain an ongoing commitment to an increased amount of instructional and support time;
- The Transition and ABE programs’ class schedules do not conflict; and

This *dual enrollment option* exists as an accelerated, viable alternative for some students, and is something on which staff from both the Transition program and the ABE program should collaborate to ensure the continued support for and success of the students.

**MAPT Assessment**

**Federal Requirements and the National Reporting System**

The authorizing federal legislation for adult education services is the Workforce Investment Act of 1998 (WIA), and specifically Title II of WIA, the Adult and Family Literacy Act (AEFLA). When WIA was enacted, Title II established a comprehensive performance accountability system to assess the effectiveness of states in achieving continuous improvement of adult education and literacy activities, in order to optimize the return on investment of federal funds. The National Reporting System (NRS) is the accountability system established to address that requirement in the law\(^3\).

Under the law, Massachusetts and all states are accountable for showing progress toward continuously improving in performance using the following performance measures:

- Demonstrated improvements in literacy skill levels in reading, writing, and speaking the English language, numeracy, problem solving, English language acquisition, and other literacy skills;
- Placement in, retention in, or completion of, postsecondary education, training, unsubsidized employment or career advancement;
- Receipt of a secondary school diploma or its recognized equivalent; and,
- Any additional indicators of performance identified by the state.

\(^3\) For more information about the NRS, see the National Reporting System website: [http://www.nrsweb.org/](http://www.nrsweb.org/).
In order to meet federal requirements\(^4\), Massachusetts assessment policies must include only those assessments that have been approved by the U.S. Department of Education's Office of Vocational and Adult Education (OVAE) for measuring educational gain within the NRS framework. For this reason, Massachusetts requires Transition grant recipients to administer the federally-approved Massachusetts Adult Proficiency Test (MAPT) to measure learning gains.

Massachusetts assessment policies for Transition grant recipients are posted at http://www.doe.mass.edu/acls/cc/default.html. Massachusetts' complete approved assessment policies, for all grant programs, are available in individual Assessment Policy and Procedure Manuals for each assessment, at: http://www.doe.mass.edu/acls/assessment/.

Policy updates may be released in monthly or occasional written communications from ACLS (e.g. Memos to Directors or Test Administrators, Assessment Updates in ACLS Mailings), and are maintained at: http://www.doe.mass.edu/acls/mailings/.

Recipients of ACLS grants are required to review all of these policies, including updates in ACLS mailings, and be in compliance with them.

For more information about federal educational functioning levels and the NRS, see the NRS website: http://www.nrsweb.org/.

**MAPT Assessment Overview**

Transition Programs are required to administer the MAPT reading and math assessments for the following purposes:

- Confirm enrollment and allow for SMARTTT data entry (a pre-test score entered in SMARTTT is needed for SMARTTT data entry to occur);
- Learn more about students’ academic strengths and needs using the individual MAPT score reports;
- Compare Transition students’ MAPT and Accuplacer scores;
- Evaluate MAPT test items in the 600-700 score range; and
- Capture student learner gains as a result of students’ participation in the Transition program.

All staff administering MAPT assessments must have successfully completed training to appropriately administer the MAPT, and must have certificates on file at their program.

**MAPT Pre-Testing**

MAPT pre-tests in both Reading and Math are required for all Transition students. Pre-test scores must be entered in SMARTTT in order for attendance to be entered and enrollment to be verified.

Programs are required to administer the MAPT pre-tests within a month of a student’s enrollment in the program. However, programs are strongly encouraged to administer the

\(^4\) See the *Goal Setting and Follow Up* section, under *Educational Advising and Career Planning*.
assessments within the first two weeks of classes so that learning gains can be captured in a post-test, and all data can be entered within the allowable timeframe\(^5\).

The pre-test requirement may be satisfied when a student has MAPT post-tests from the previous May or June, in which case the recent post-test scores may be copied over to serve as a pre-test for the new fiscal year; there is a function in SMARTT called the MAPT Copy Feature that facilitates this process.

If a student has more than one score under 600 in the same MAPT assessment category (Math or Reading), the program must choose the most recent score to be copied. If the student has a May/June MAPT score under 600 and another earlier MAPT score of 600 or higher for the same assessment category, then the program must choose only one of these scores to be copied over.

For further information, see the Assessment Policy for Transition to Community College Programs, posted on the ACLS Assessment page (http://www.doe.mass.edu/acls/assessment/)

**MAPT Post-Testing**

For Transition students with MAPT pre-test scores below 600, a MAPT post-test is required, within each fiscal year, in the student’s primary assessment area for the purpose of measuring learning gain. Programs may choose to post-test in both reading and math if a student is likely to show gain in both areas.

**Program Design**

Transition programs must ensure that students function as members of a learning community or cohort within the community college. To this end, programs must implement at least one cohort strategy (e.g., students' enrollment in a common course, ongoing group advising, an after-class study group). As part of the cohort model, students are more likely to identify with their peers and be better equipped to navigate the community college.

Programs are required to provide instructional services of sufficient frequency, duration, and intensity to enable students to reach their goals in the most accelerated and effective manner. All instructional offerings should be accurately captured in the program’s SMARTT plan.

Programs are required to offer full-semester College for Success and Technology for College courses. The College for Success course should be offered in both the fall and spring semesters, and should prepare students to: understand college culture and navigate college systems; identify barriers to attainment of postsecondary education goals and strategies for overcoming these barriers; and acquire the readiness skills that are essential for postsecondary education success.

The Technology for College course should be offered in both the fall and spring semesters, and should identify and promote the technology knowledge and skills that a student will need in order to be a successful college student. If the program determines that a student already has the requisite technology skills, the program must maintain documentation to support this. In addition

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\(^5\) The Department requires data to be brought up to date not less than monthly, and allows no more than one additional month for extenuating circumstances. Enrollment and attendance data entry is permanently closed by the last day of the second succeeding month, and data is not allowed to be entered retroactively. See Statement of Assurance for ABE Transition to Community College Programs in Appendix A.
to offering these required courses, the program must also provide academic skill courses (e.g., math, writing) at no cost to transition students who need them or otherwise ensure that students’ academic needs will be met.

For all Transition courses that are supported by ESE and/or match funds, the course content and instruction should support students in the acquisition of the skills and abilities needed to successfully transfer into degree-bearing college credit courses, and contribute to students’ progress toward achieving their postsecondary education and career goals.

Programs are required to identify to prospective students the completion requirements and the time frame expected to successfully finish the program.

**Educational Advising and Career Planning**

**Role of the Advisor**

Programs are required to have a designated Educational Advisor to provide, coordinate, and document all advising, and to provide learners with support services and guidance to assist them in meeting their educational and career goals. The Advisor should work with the college and each student to provide educational advising and career planning; develop and maintain an individual education and career plan; and ensure that the student receives the academic and support services needed to succeed in postsecondary education. The Advisor should also refer students to the appropriate resources within the college and beyond to support students and assist them with transitioning to their next steps. In addition, the Advisor should ensure that labor market trend information is used to inform career planning.

**Goal Setting and Follow Up**

Students typically have one goal for being in a Transition program, and that is to succeed in college (i.e., pass degree-bearing college credit courses to earn a degree in the student’s desired field of study in order to start a career earning a family-sustaining wage). However, students often have other goals when enrolling in a program (e.g., learning about the college system, becoming proficient in technology, receiving financial aid). The Advisor must ensure that students stay on track in achievement of their goals through regular meetings beginning at enrollment.

**National Reporting System (NRS) Goal Setting Cohort Information**

The NRS is the federal reporting system that each state receiving federal funds for ABE must use to report data about the number of students served, demographic information about those students, and the certain outcomes achieved by those students. For the NRS, ESE reports aggregate information and, as a state, we are held accountable for achieving outcomes based on performance targets that are negotiated with the United States Department of Education (USDE). Starting in FY13, the NRS began capturing outcomes for some of its measures differently. Specifically, students are assigned to cohorts for the outcomes related to completion of a high school credential, entering employment, retention of current employment and entering post-secondary education. The USDE is implementing these changes in order to capture the
maximum number of student outcomes. Additionally, it ensures that all states are using the same criteria for reporting purposes. For more information about the NRS: http://www.nrsweb.org.

Professional Development (PD)

There are many PD resources for programs (e.g., the MA ABE PD system, the National College Transition Network (NCTN), College and Career Readiness websites, and the Massachusetts ABE Curriculum Frameworks http://www.doe.mass.edu/acls/frameworks). Programs are encouraged to stay up-to-date on all emerging research. Attendance at the annual NCTN conference is encouraged. Participation in online Transition listservs is a way to stay current on emerging Transition research, issues, and resources. Other resources include the Common Core State Standards http://www.corestandards.org, the College and Career Readiness Standards for Adult Education http://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf, and the Transformation Agenda online curriculum modules http://mccwdta.etlo.org.

Administrative Requirements

The Statement of Assurances for Transition grants (see Appendix A), required to be reviewed and signed annually by the Board of Trustees and the College President, itemizes specific fiscal checks and balances required of all private non-profit organization grant recipients. The assurances are updated annually and submitted to the Department with the grant application, and failure to fulfill them may be cause for withholding of payments and/or termination of the grant.

Recipients of ESE-funded ABE grants must ensure a fair and equitable process to hire highly qualified staff. Programs are encouraged to hire staff who reflect the ethnicity, linguistic and cultural background of the student population. The hiring process/protocols must be documented in a staff handbook.

If the grant recipient implements a policy of paying vacation time to part time employees, vacation time may be paid from the ESE grant for part time, grant-funded staff persons, based on the proportion of their actual time worked on the grant compared to their full time counterparts.

If a grant funded employee ceases employment, by whatever method (resignation, retirement, termination, etc.), directly charged lump sum compensated absences payments to the grant are not allowable for federal grants. Additionally, state funded grants do not allow grant charges that occur under similar circumstances.6

No Charges to Students

Grant or matching funds must cover all costs associated with the College for Success and Technology for College courses (e.g., tuition, fees, texts, supplies, and other materials).

Collaborations and Memoranda of Agreement

The memorandum of agreement (MOA) is a written document describing the agreement between the grantee and another organization (working together) to deliver services to undereducated or

6 For more information on the federal regulations, refer to Office of Management and Budget (OMB) circular A-87, Attachment B, Section 8, part d (3) or to OMB circular A-122, Attachment B, Section 8, part k (2) (a).
limited English-speaking adults. The purpose of the MOA is to formalize and clarify the expectations of the grantee and partnering program to provide services.

Grantees that include a collaboration of more than one organization must have an MOA that is signed by all parties and renewed annually. Agencies with sub-contracts must also have an MOA between the lead agency and the sub-contracting agency that is renewed annually. MOAs must meet the guidelines and requirements outlined in Appendix B.

**System for Managing Accountability and Results Through Technology (SMARTT)**

All Transition Programs must annually complete the following required program planning components of the Department of Elementary and Secondary Education's web-based planning and reporting system, the System for Managing Accountability and Results Through Technology (SMARTT).

- Class Plan, Non-Rate Based Classes only
- Class Funding Detail Sheet
- Flex/Set-Aside/Foundation Sheet
- Direct Staff Plan
- Direct Summary Sheet – match amount only
- Administrative Cost Worksheet

**Documentation of Services and Record Keeping**

ESE-funded ABE programs must maintain accurate documentation for all services.

- The grant recipient must be able to account for all funds. The time and effort record required for each person on the budget (see Fiscal Requirements section) must reflect appropriate alignment among the hours worked on the grant, the hours in the budget, and the payroll. The grant recipient must be able to demonstrate that required functions are provided according to the approved budget.

- ACLS requires grant recipients to submit an organizational chart that includes the community college of which it is a part as well as Transition program staff. If, during the multiyear funding period, the organizational structure changes from that submitted with the grant proposal, the grant recipient must notify the Department and submit an updated organizational chart.

- All ESE-funded ABE programs must have written personnel and administrative policies and procedures in place to ensure efficient and effective service delivery and to guarantee fiscal accountability.

- Current written job descriptions must be maintained for each job within the Transition Program. The job descriptions and minimum requirements submitted with the original grant proposal, unless renegotiated, are expected to apply throughout the multi-year grant period. If the grant recipient determines that a job description or its minimum qualifications needs adjusting, it must notify the Department in writing. Minimum
requirements originally approved may not be lessened without prior Departmental approval.

- Hard copies of student, governing board, and fiscal records must be maintained for seven years. Equipment databases or inventory lists must be kept for not less than 15 years.

Programmatic and fiscal data collection and reporting systems are official records. Falsification of any required documentation or report may be grounds for immediate termination of the grant, return of grant funds, and/or prosecution.

All recipients of ESE grants should be aware that ESE conducts routine fiscal reviews and data audits of its funded programs.

**Required Reporting**

Recipients of ABE Transition to Community College grants submit reports through entering data in SMARTT, through sending required reports, and by submitting various required fiscal reports, such as the budget (Standard Application for Grants and Budget Detail Pages), Amendments (Form AM1), monthly Requests for Funds (Form RF1), and the annual Final Financial Report (Form FR1). Each of these has a required schedule for submission, published annually in communications from the Department.

Grant recipients must submit timely and accurate reports. ESE requires that data entered into SMARTT be brought up to date at least monthly, and recommends that data entry be ongoing, with data entered as soon as it is available. To accommodate extenuating circumstances, the Department allows a maximum of one additional month. (see *Timely Data Entry* section)

Failure to submit/transmit timely and accurate reports may result in a suspension of further payments until the ESE receives accurate and complete reports.

**Performance Standards**

There are currently two enrollment performance standards for Transition programs:

- First, Transition Programs must enroll at least 15 students per semester.
- Second, 80% of the program's total student enrollment must be comprised of students who were previously (or are currently) enrolled in ESE-funded adult learning programs and the Massachusetts ABE system (enrolled in ESE-funded adult learning programs).

The Transition program is the final step in an educational system that begins with basic literacy and/or the inability to speak or understand English, and that ends with transition to next steps, including post-secondary education and careers. The Department invests adult basic education funding in the Transition grant program in order to provide an opportunity for students enrolled in the State's ABE system to successfully achieve their college and career goals. The second performance standard sets a measure for determining the extent to which the grant program is achieving that purpose.

The Department is considering additional measures for potential as performance standards, including the number of degree-bearing college credit courses completed by students enrolled in and after completion of the Program.
Policies and Procedures to Ensure Data Quality

Transition program performance, measured against state standards with data entered in SMARTT, has a significant impact on both a program’s success in competing for funds and whether its funding is continued throughout a multi-year funding cycle. Accordingly, it is important that the quality of this data across the state is consistent and accurate. The Department relies on three main strategies for ensuring data quality: timely data entry, each program’s assurance that data quality measures are in place, and data audits.

Timely Data Entry

A key principle for assuring data quality is to ensure that data is reported in a timely manner according to a fixed, regular schedule. If the time lag for reporting data is too long, the likelihood of missing, and possibly inaccurate, data increases. All ESE-funded programs are responsible for collecting required information and reporting it to the Department in a timely manner.

ESE requires that data entered into SMARTT be brought up to date at least monthly, and recommends that data entry be ongoing, with data entered as soon as it is available. To accommodate extenuating circumstances, the Department allows a maximum of one additional month.

Accordingly, enrollment and attendance data entry for each month will be closed off permanently by the last day of the second succeeding month, and will not be allowed to be entered retroactively. Further, there will be no opportunity to delete enrollments and re-enter data later in the year.

For example, enrollments and attendance from September are expected to be entered during October. In order to accommodate extenuating circumstances that may cause an unavoidable delay, however, they will continued to be accepted in November, but will not be accepted after November 30 for any reason. All enrollments and attendance from October are expected to be entered during November, but will not be accepted after December 31, enrollments and attendance from November will not be accepted after January 31, etc.

The only exception is data from the summer months. Because the first "data lock-out" date of each fiscal year will be October 31, there will be an additional month available for July data. Nevertheless, the requirement is still that data will be kept current by updating it no less frequently than monthly. The additional month is to accommodate unexpected problems. Under normal circumstances, enrollment and attendance data is expected to be entered by the end of the following month.

Repeated instances of failure to submit timely and accurate programmatic data will have a negative impact on a program’s performance points, and may result in a suspension of further payments and/or a reduction in the current year's grant award.

Requirement to Maintain a Minimum of Two Staff in Data Entry

To ensure the capacity of programs to meet the timely data entry requirement, all ESE-funded programs are required maintain at all times a minimum of two staff proficient in using SMARTT and Cognos. Each program must ensure the participation of two staff members in required SABES SMARTT and Cognos trainings, including refresher/update trainings as needed, in order
to stay current with changes. Each program must also ensure that new people participate in the
trainings whenever staff turnover necessitates.

Temporary unavailability of a primary data entry person due to illness or staff turnover will not
excuse the requirement to keep data current. Therefore, it is in the program's best interest to
ensure that both individuals trained to enter data in SMARTT maintain their facility by actually
doing so on a regular schedule and ongoing basis, and/or to have more than two people trained.

Assurance of Data Quality Measures

The data collected at the program and reported in SMARTT are official records and, as such,
must be accurate, valid, and reliable. Each state is required by the federal government to attest
annually that it has policies and procedures in place to ensure the quality of the state's data,
outlined in a "Data Quality Checklist" signed by the State Director of Adult Education and
submitted with the state's final report. Many states require local providers to sign a similar set of
assurances.

Beginning in FY 2013, the Department will require a signed assurance from each recipient of
funds to confirm that policies and procedures are in place to ensure the quality of the local data
submitted in SMARTT, and to address any weakness in this area. This assurance will be
provided by completing a “Data Quality Checklist,” and submitting it at the end of the fiscal
year, when the data is being rolled over to the new fiscal year.

Data Audits

To further ensure that the data reported in SMARTT is accurate, the Department conducts data
audits on a selected subset of programs each year.

Any submission of data/information that can reasonably be determined to be known by the
recipient, or that should have been known by the grant recipient, to be false is grounds for
immediate termination of the grant and the return of all grant funds related to the falsified
data/information.

The purpose of these measures -- the timely data entry policy, the requirement for staff to be
trained in SMARTT, the Data Quality Checklist, and data audits -- is to ensure that
Massachusetts ABE data is accurate, and that the system is fair -- that all programs are playing
on a level field and accurately reflecting student participation in a consistent manner.

Mandated Reporting of Abuse

All adult education practitioners 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, 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.
This table outlines age, population, reporting agency and statute information for mandated reporters:

<table>
<thead>
<tr>
<th>Age</th>
<th>0 – 18 years old</th>
<th>18 – 59 years old</th>
<th>60+</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>Children</td>
<td>Disabled Adults</td>
<td>Elderly</td>
</tr>
<tr>
<td>Reporting Agency</td>
<td>Department of Social Services</td>
<td>Disabled Persons Protection Commission</td>
<td>Executive Office of Elderly Affairs</td>
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<tr>
<td>Statute</td>
<td>51A</td>
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</tbody>
</table>

**Americans with Disabilities Act (ADA) Compliance**

The Americans with Disabilities Act (ADA), is a comprehensive federal civil rights law that was enacted on July, 26 1990 to ensure that the civil rights of persons with disabilities are not violated through the use of discriminatory practices in employment, public services, public accommodations and communications.

As a provider of services to the public, each ESE-funded program is obligated to provide reasonable access to services for all persons. In an effort to ensure that all ABE programs are responsive to adult learners with disabilities, the Department requires that each ABE program identify an ADA Coordinator whose primary role is to ensure that the program is in compliance with ADA.

For more information and resources about serving students with disabilities and ADA compliance, see the ACLS Disabilities Services webpage ([http://www.doe.mass.edu/acls/disability/default.html](http://www.doe.mass.edu/acls/disability/default.html)).

**Required Meetings**

ABE Transition to Community College programs must send one representative to the annual ABE Directors’ meeting, and a minimum of one representative to ACLS sponsored meetings for Transitions Programs.

**Acknowledgement of Department of Elementary and Secondary Education Funding**

The grant recipient is required to identify the Department of Elementary and Secondary Education in any official correspondence as the entity supporting the delivery of services at the program. The Department retains an unrestricted and irrevocable right to publish and distribute any materials developed under this grant.

**Fiscal Responsibilities**

The grant recipient is responsible to ensure that the grant program the program covered in the application will be administered in accordance with the provisions and conditions of all applicable federal and state statutes, regulations, program plans, and applications. The grant recipient's governing board and chief executive officer sign assurances to this effect each year.

**Federal Guidance**

The Education Department General Administrative Regulations (EDGAR) outlines regulatory materials and requirements on the administration of federal grants and agreements. Parts 74-99
of Title 34, Code of Federal Regulations (CFR) are collectively known as the Education Department General Administrative Regulations (EDGAR). These parts contain regulations for administering federal discretionary and formula grants awarded. The official version of these regulations is published by the Office of the Federal Register (OFR), available online at: www.gpoaccess.gov; they can also be ordered in printed volumes. Title 2 in the Code of Federal Regulations (2 CFR), Subtitle A, Chapter II, part 225, outlines general principles for determining allowable costs to provide a central location for Federal government policies on grants. (http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5fe0b356f57d744e1e01f1b8712bf7db&rgn=div9&view=text&node=2:1.1.2.10.4.0.15.10.6&idno=2).

In addition to the federal regulations outlined in EDGAR and 2 CFR, the Workforce Investment Act (WIA) imposes certain regulations specific to that legislation, including the stipulation that funds made available for adult education and literacy activities under AEFLA shall supplement and not supplant other state or local public funds expended for adult education and literacy activities. WIA stipulates the purpose of grants made under the Act, and requires integration of adult education and literacy activities with other adult education, career development, and employment and training activities in the state. It also requires local providers to coordinate with support services that are not provided under AEFLA prior to using AEFLA funds for support services.

**State Guidance**

The authorization for state grants for adult basic education is in the annual state budget, in the Department of Elementary and Secondary Education's budget:

"For the provision and improvement of adult basic education services, including reading, writing and mathematics; provided, that grants shall be distributed to a diverse network of organizations which have demonstrated commitment and effectiveness in the provision of such services, and that are selected competitively by the Department of Elementary and Secondary Education; provided further, that such grants shall support the successful transition of students from other adult basic education programs to community college certificate and degree-granting programs; provided further, that such grants shall be contingent upon satisfactory levels of performance as defined and determined by the department; provided further, that in no case shall grants be considered an entitlement to a grant recipient; provided further, that the department shall consult with the community colleges and other service providers in establishing and implementing content, performance and professional standards for adult basic education programs and services; and provided further, that no funds shall be expended for personnel costs at the Department of Elementary and Secondary Education."

Recipients of state and federal adult basic education grants are responsible for ensuring that grants are managed with sound fiscal systems and procedures that meet all state and federal requirements.

Grant recipients are advised that:

- ABE grant funds may not be used to pay for expenses that have been paid for by any other local, state, federal, or private award.
• Fiscal reports must be submitted by the deadline established by the Department of Elementary & Secondary Education unless the grant recipient acquires a prior written waiver. Failure to submit/transmit timely and accurate reports will result in a suspension of further payments until the Department receives accurate and complete reports.

• The grant recipient must maintain a time and effort record for each staff person that reflects appropriate alignment among the hours worked on the grant, the hours in the budget, and the payroll.

• The grant recipient is responsible to having appropriate accounting systems in place to track expenditures, and to notify the ACLS Program Specialist if there is a change in the spending plan due to vacant positions or other circumstances.

• The grantee is legally responsible for effective management of the grant, including any funds committed to a subcontracting 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 Memorandum of Agreement and in a timely manner.

• If a program believes that funds may be unspent during the program year, including funds assigned to a subcontractor, the grantee will be asked to amend the grant down no later than January. This early notification and return of unexpended funds allows the Department sufficient time to reallocate those funds to meet needs in other programs.

How to Manage Grants

After a grant has been awarded, it is the responsibility of grant recipients to ensure that it is implemented in compliance with any applicable programmatic requirements. In the administration of grants, recipients must use fiscal controls and fund accounting procedures that will ensure proper disbursement of, and accounting for, grant funds received under any funding award. (See ESE's Checklist of Standards for Financial Management Systems http://www.doe.mass.edu/grants/procedure/forms/o.pdf)

The information below highlights some key information related to requesting funds, making amendments, and final reports on grants. The Department's Grants Management Procedural Manual at http://www.doe.mass.edu/grants/procedure/manual.html provides much more information. The Grants Management Forms webpage at http://www.doe.mass.edu/grants/procedure/default.html, in addition to all grants forms, provides help documents on key topics, worksheets and other resources. Grant recipients are advised to have the person responsible for fiscal management familiarize herself or himself with these resources.

State Finance Regulations. State finance regulations stipulate that grant recipients may only expend funds from the date their grant was entered as approved into the Department's Grant Management system. This means that if a grant recipient wishes to expend grant funds as of a certain start date, ACLS must have completed its programmatic review of the grant, any issues or concerns need to have been resolved, and the grant must have been submitted as approved to the Department's Grants Management office prior to that start date.
Grant recipients may not use local funds to cover initial costs for a grant prior to receiving official approval from the Department, with the intent to reimburse themselves after receiving the award notice. Audit exceptions may be taken for any grant funds used for periods not covered by the award letter, leading to grant recipients needing to pay back the misused grant funds.

**Request for Funds Process.** Once grants are approved by ACLS and Grants Management, the Grants Payment unit will complete the process to generate an initial payment authorization by the State Comptroller. The payments for grants are determined based on the following standard allotment schedule.

- Up to $5,000: Full payment with initial award
- $5,001 or more: All grants will receive an initial payment automatically upon approval, the amount to be determined by the total grant award divided by the number of months in the grant duration. Subsequent payments must be requested on a monthly basis.

After the initial payment on the grant, the balance of funds must be requested on a monthly basis. It is incumbent upon grant recipients to submit their draw down requests within the designated timeframe, usually the last two weeks of the month. Managing a grant requires managing and monitoring expenditures carefully, in order to draw down funds as needed and also to ensure that state funds are expended regularly and expended in full by the close of the fiscal year.

To ensure that funds are distributed on an "as needed" basis in accordance with both state and federal cash management requirements, the balance of funds must be requested on a monthly basis. The requests should be based, as much as possible, on actual expenditures, rather than what is obligated.

In general, grants are awarded for a period of one school year at a time. Because of differences in the state and federal fiscal years, there will be differences in the grant duration between state and federal grants. Typically, a state funded grant will have a start date in July, with an end date of the following June 30th, which is the end of the state fiscal year. Federal grants follow more closely the federal fiscal year (October 1, to September 30), and usually start September 1, and end the following August 31.

Regardless of the funding source, the final payment on all grants must be requested before the end of the state's accounts payable period, which is August 31; failure to claim in time may result in the loss of those funds.

**The Amendment Process.** Amendments are required when:

- there is any significant change in program objectives; or
- there is any increase or decrease in the total amount of the grant; or
- an increase in a line of the budget exceeds $100 or 10% of the line (whichever is greater), or exceeds $10,000.

Amendments are not required when:

- there is no significant change in program objectives;
- there is no increase or decrease in the total amount of the grant; and
• an increase in a line of the budget is less than or equal to $100 or 10% of the line (whichever is greater), and does not exceed $10,000.

When it is determined that an amendment is required, the grant recipient should fill out the standard amendment form (Form AM1), attach revised budget pages and submit it to the ACLS Program Specialist.

The maximum number of amendments to any grant may not exceed two. Exceptions to this limit may be allowed based on sufficient justification as determined by the appropriate and responsible approving authority in the Department.

After the amendment request is submitted, it goes through several stages of review: first, the ACLS Program Specialist conducts a programmatic and technical review and forwards it to an ACLS supervisor for signature. The amendment is then forwarded to an authorized fiscal representative of the Department for review and signature, and then submitted to Grants Management for technical review. When the amendment is technically correct, the revised budget is entered into the computer in Grants Management and the amendment is filed in the project folder.

In order to allow time for all of these required steps to occur, it is important to submit amendments at least thirty (30) days prior to the desired change and must be submitted thirty (30) days before the conclusion of the project.

The Final Reporting Process. At the conclusion of grant activities, recipients must submit a final financial report (form FR1) to the Department, accounting for the expenditure of funds received. The FR1 form should be submitted to Grants Management within sixty (60) days of the end date of the grant. Grant recipients should file their reports after carefully reconciling all figures with their city auditor, town accountant, or agency business manager.

Grants Management checks these reports to ensure that the expenditure of funds for each line item corresponds to the amount budgeted for that line. Note that over-expenditures that fall at or below the $100, 10% or $10,000 line item increase thresholds specified in the Department's amendment policy will be allowed and the final report will be filed. Increases in line items, without approved amendments, that exceed these thresholds, will be subject to possible audit exceptions and the required return of any funds that were expended inappropriately.

Unexpended Funds and Preliminary Expenditure Review. Grants from the Department are generally awarded for a period of one fiscal year at a time. For all grants, unexpended funds must be returned with the Final Financial Report (FR-1) each year. Unexpended amounts of $1.00 or less do not have to be returned. For grants funded with state money, unexpended amounts must be returned to Grants Management; these funds revert to the state at the conclusion of the fiscal year and cannot be reused. State regulations provide no flexibility for use of funds after June 30, either by the grant recipient or by the Department.

For this reason, while it is important to monitor all spending, it is particularly important to monitor expenditures on state grants to ensure that funds are expended within the fiscal year.

As with all grants, the FR-1 and any unexpended funds must be submitted to Grants Management within sixty (60) days of the grant end date.

The Department recommends that grantees conduct a Preliminary Expenditure Review. The intent is to encourage recipients to review grant expenditures within a timeframe that allows for a
reasonably early determination of which grants will end with an unexpended balance that will have to be returned. At this point in the grant's lifecycle, a reduction amendment can and should be submitted to reduce the grant by the projected unexpended amount. Due to restrictions within the Massachusetts state accounting system, any such reduction amendments must be approved (by the appropriate program unit) and submitted to Grants Management no later than May 15th each year. Amendments submitted after that date may not be processed in time to change the original grant encumbrance.

ACLS requests that, whenever possible, reduction amendments be submitted by January so that the unexpended funds from one program can be reallocated to address unfunded needs in other programs. After February or March, it is unlikely that another program would be able to expend an increase by June 30.

Financial Audit. Auditing is a management tool for evaluating whether operations are executed economically, efficiently, and effectively. Audits of grant programs should be conducted on a regular basis. Private non-profit organizations are required to submit annually to the Department a copy of the applying agency's latest completed audit report, issued by an independent certified public accountant. Excepted from this requirement are state and local entities whose audits the Department accesses directly, such as state colleges, community colleges, and universities, state and county correctional facilities, local public educational authorities and city- or town-operated public libraries.

All recipients are required to maintain for purposes of audit or review, records, books, reports and any other data pertaining to a grant award for a period of seven (7) years, beginning on the first day after the final payment is received for that award. These books and records must be in sufficient detail to properly substantiate all claims for payment and expenditures made under the grant.

Required Matching Contribution and Maintenance of Effort (MOE)

Recipients of ABE grants must provide fully auditable matching resources equal to at least 30% of the grant award. In each subsequent year, including the first year of a new competition, the matching contribution must be equal to the amount contributed in the previous year, or 30% of the new grant amount, whichever is greater. The matching share committed in year one of a multi-year grant cannot be reduced without the Department’s written approval. This is referred to as “maintenance of effort”.

Instructional and support services provided with matching funds must meet the programmatic criteria as outlined in the Massachusetts Guidelines for Effective ABE Transition to Community College. Matching resources must add value to program operations, instructional and support services. Matching resources must be fully documented, auditable and comprised of directly allocable costs.

Grant applications and budget forms must identify the source or sources of matching funds.

ESE requires that matching resources support the Transition program. Funds that support any portion of the services provided to learners through the grant program are good examples of match that support the Transition program. Local cash contributions are an example of match if they support the Transition program.

The chart below, while not all-inclusive, provides some examples of eligible match.
### Examples of Costs Eligible as Matching Contribution to an ABE Transition to Community College Grant

<table>
<thead>
<tr>
<th>Cost Description</th>
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<tbody>
<tr>
<td>College courses for Transition students</td>
</tr>
<tr>
<td>Advertising for adult learners and/or staff recruitment purposes</td>
</tr>
<tr>
<td>Conference registrations for Transition Program staff</td>
</tr>
<tr>
<td>Educational supplies for adult learners in the Transition Program</td>
</tr>
<tr>
<td>Fringe benefits for Transition Program staff</td>
</tr>
<tr>
<td>Memberships to ABE-related professional organizations</td>
</tr>
<tr>
<td>Office supplies for the Transition Program</td>
</tr>
<tr>
<td>Printing and reproduction of non-copyrighted materials for Transition Program use</td>
</tr>
<tr>
<td>Salaries for Transition Program clerical and data entry staff</td>
</tr>
<tr>
<td>Salaries for Administrators including time for any of the functions listed on the staff plan</td>
</tr>
<tr>
<td>Salaries for direct service personnel including teachers and counselors including time for any of the functions listed on the staff plan</td>
</tr>
<tr>
<td>Software upgrades for learners and staff in the Transition Program</td>
</tr>
<tr>
<td>Subscriptions to ABE-related publications for learners and program staff</td>
</tr>
<tr>
<td>Telephone and Internet expenses for the Transition Program including TTY, ISDN</td>
</tr>
<tr>
<td>Travel expenses for Transition Program staff</td>
</tr>
<tr>
<td>Vacation/Leave Time for Transition Program staff</td>
</tr>
</tbody>
</table>

### Full-Time Equivalency

Grantees must base full-time equivalency (FTE) calculations on the grantee agency's written definition.

The FTE is based on the college's definition of full-time employment; or, the FTE for may be calculated by dividing the employees paid hours/year by the number of annual hours that the college defines as "full time," i.e., (actual paid hrs/wk) x (paid wks/yr)/ college definition of full time hrs/wk) x (52 wks).

### Limit on Administrative Costs

Recipients of adult basic education grants must spend not less than 85% of funds on direct services; not more than 15% may be spent on administrative costs, including indirect costs.

### Indirect Cost Rate

Indirect Costs are costs that can be rationally attributed to the running of a program, but cannot reasonably be assigned a direct cost. An organization that wishes to charge indirect costs must apply to the Department annually. The Department has been granted authority to assign annual restricted indirect cost rates to be applied to grants issued by the Department. This procedure is for all entities except traditional Local Educational Agencies (LEAs) and other municipalities. Questions about indirect cost should be directed to the Department's Audit and Compliance unit (Audit and Compliance). Audit and Compliance assigns indirect cost rates for ESE grants issued to non-LEAs in the following manner:
A grant recipient having a separately approved, negotiated rate with the Federal Government must send a copy of its current approval letter with the Annual Application for Indirect Cost Rate form. This rate may then be adjusted downward by Audit and Compliance, based on specific requirements of the grant(s) being applied for. The Department limits the indirect cost that may be charged to adult education grants to a maximum of 8% of direct costs.

A grant recipient that does not have a current Federal rate may apply to ESE for a maximum five percent (5%) indirect cost rate using the Annual Application for Indirect Cost Rate form.

In order to receive this approval, the grant recipient must be current in the filing of all of its Final Reports (FR1) for prior grants awarded by the Department.

Agencies with an approved federal indirect cost rate shall receive not more than an 8% indirect rate for adult education programs. Agencies with an ESE-approved indirect cost rate (IDC) shall receive not more than a 5% indirect rate for adult education programs.

Agencies must re-apply every year for an approved indirect cost rate.

The indirect cost rate is applied to the sum of the direct costs excluding equipment (budget line items 1 through 8). The total of direct and indirect costs may not exceed the total grant award.

An agency with a federally-approved or ESE-approved indirect rate may apply to the matching requirement the difference between the approved rate and the amount charged to the grant. For example, an organization with a federally approved rate of 15% may charge to the adult education grant a maximum of 8% for indirect costs. The 7% difference between the federally approved rate and the ESE maximum could be applied to match. In another example, an agency may be eligible to charge an indirect rate of 8% to the grant, but may opt to charge only 5% in order to apply a larger portion of the grant to direct program costs. In that case, the difference between the eligible amount and the amount charged may be applied to match.

In lieu of charging for indirect costs, grantees that provide an appropriate and detailed allocation of agency wide costs to programs may receive ESE approval to include them as direct costs.

**Indirect Cost Assignment When Sub-Grantees Are Involved**

*When the direct grant recipient and the subcontractor both have approved indirect cost rates:*

If both the direct recipient of the ESE ABE grant and the subcontractor have approved IDC rates, both the direct grant recipient and the subcontractor may charge IDC.

If both agencies charge an indirect cost rate, the total dollar amount for indirect charged by the direct grantee and subcontractor(s), may not exceed the maximum dollar amount for which the direct grantee is eligible.

*When the direct grant recipient has an approved indirect cost rate, but the subcontractor does not:*

A subcontractor may charge IDC as long as the direct grant recipient has an approved IDC rate and the dollar amount of the total IDC does not exceed the maximum dollar amount for which the direct grantee is eligible.

*When the subcontractor has an approved indirect cost rate, but the direct grant recipient does not:*


If the direct grant recipient does not have an approved IDC rate, then no subcontractor may claim IDC. All subcontracts are bound by the maximum amount the direct grant recipient could charge under the grantee’s approved IDC rate.

In all circumstances, the total amount charged as IDC, including subcontracts, may not exceed the dollar amount for which the direct recipient of the ESE ABE grant is eligible, under the grantee’s ESE-approved IDC rate.
Appendices

FY 2015 Statement of Assurances for Adult Basic Education Transition to Community College Grant Recipients

FY 2015 Guidelines for Memoranda of Agreement (MOA) Between ABE Grant Recipients and Partnering Organizations
**FY2015 ADULT BASIC EDUCATION TRANSITION TO COMMUNITY COLLEGE**

**STATEMENT OF ASSURANCES FOR FUND CODE 668**

Organization Name: ____________________________________________________________

(The Organization Name must match the Applicant Name on Line A on the Standard Contract Form and Application for Program Grants, Program Unit Signature - Part I of Required Forms.)

1) The grant recipient hereby assures the Massachusetts Department of Elementary and Secondary Education (The Department, or ESE) that the grant recipient will administer the program covered in the application in accordance with the provisions and conditions of all applicable federal and state statutes, regulations, program plans, and applications.

**FISCAL AND DATA ASSURANCES:**

*The grant recipient assures ESE that:*

2) Grant award funds will not be used to pay for expenses that have been paid for by any other state or federal award.

3) Separate and auditable records will be maintained for each project for which the grant recipient receives funds; time and attendance records will support payrolls; and, time distribution records will support salaries and wages of employees chargeable to more than one grant program.

4) The grant recipient will maintain and document an appropriate and auditable matching share of not less than 30% of the grant award. Commitments made in FY2015 to provide matching funds will be maintained in each subsequent year of this multi-year grant award period.

5) All costs associated with the College for Success and Technology for College courses (e.g., tuition, fees, texts, and other materials) shall be covered by grant and/or matching funds.

6) Where the grant recipient assigns grant funds to one or more subcontractors:
   a) the grant recipient assumes responsibility for effective management of the entire grant, including any funds committed to subcontractors to purchase student services; and,
   b) the grant recipient will monitor contractual services and ensure that all grant funds are fully expended as articulated in a signed Memorandum of Agreement and in a timely manner.

7) The grant recipient will notify ESE as soon as possible if funds may be unspent, including funds assigned to subcontractors, and will amend the grant down so that the funds can be reallocated as may be needed to other programs.

8) The grant recipient will 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 subcontractors.

9) Adults enrolled in the ABE Transition to Community College grant program will be asked in a neutral manner to provide their Social Security Number and to sign a release of information form for the purpose of facilitating access to appropriate additional and subsequent services, and to follow up on goals attained.

10) The grant recipient will ensure that data entry in the System for Managing Accountability and Results Through Technology for ABE (SMARTT ABE), will be brought up to date not less than monthly. The Department reserves the right to deduct funds from the grant award to programs that fail to meet this requirement. The grant recipient is advised that the Department will permanently close off enrollment and attendance data entry for each month by the last day of the second succeeding month, and data will not be allowed to be entered retroactively.
11) Fiscal reports and program data will be submitted by the deadline established by ESE unless the grant recipient acquires a prior written waiver. Failure to submit/transmit timely and accurate reports will result in a suspension of further payments until ESE receives accurate and complete reports. ESE programmatic and fiscal data collection and reporting systems are official records and, as such, any submission of data/information that can reasonably be determined to be known by the grant recipient or that should have been known by the grant recipient to be false is grounds for immediate termination of the grant and the return of all grant funds related to the falsified data/information.

PROGRAMMATIC ASSURANCES:

The grant recipient assures ESE that:

12) Students enrolled in the ABE Transition to Community College grant program will have received either a General Educational Development credential, an Adult Diploma Program diploma, a United States high school credential, or a high school credential from outside the United States that has been certified by the Center for Educational Documentation. All participants will be able to participate in postsecondary level academic classes conducted in English. (The only exception to this credential requirement is for dually-enrolled students in accordance with the ACLS dual enrollment policy.)

13) No fewer than 80% of the program’s grant-funded participants will have been previously enrolled in an ESE-funded adult learning program.

14) The community college will collaborate with ESE-funded adult basic education (ABE) programs to facilitate the successful transition of former ABE students to the community college, and will maintain current and formal Memoranda of Agreement with its ESE-funded ABE program partners, in accordance with the FY 2015 Guidelines for Memoranda of Agreement (MOA) Between ABE Grant Recipients and Partnering Organizations (included as an appendix to the FY 2015 Massachusetts Guidelines for Effective Adult Basic Education Transition to Community College).

15) The community college and its Adult Basic Education Transition to Community College grant program will work together to integrate both students and staff of the Transition Program into the mainstream of all the community college’s activities and functions.

16) The community college will make available to its Adult Basic Education Transition to Community College grant program students degree-bearing college credit courses at no cost.

17) The community college and its Adult Basic Education Transition to Community College grant program will collaborate where appropriate with college programs similar to Transition programs (e.g., TRIO, Transformation Agenda) in an effort to reciprocate services and resources.

18) Whenever the grant recipient collaborates with other providers in order to provide services, the collaboration is documented in a signed Memorandum of Agreement clearly delineating each partner’s roles and responsibilities.

19) The community college’s Adult Basic Education Transition to Community College program will implement a cohort model as defined in the FY 2015 Massachusetts Guidelines for Effective Adult Basic Education Transition to Community College, and will include a College for Success course and a Technology for College course.

20) When staff turnover occurs, the minimum required qualifications presented in the originally approved grant will be retained for replacement staff. The grant recipient is advised that the staff qualifications included in the grant application were considered in scoring the original proposal and thus influenced the decision to fund the proposal, and that any subsequent changes to staff minimum requirements during the multi-year grant period require prior Departmental approval.

21) The grant recipient is advised that programmatic elements included in the grant application and approved grant award, including funded services and location of services, were considered in scoring the original proposal and thus influenced the decision to fund the proposal, and that any
subsequent changes during the multi-year grant period to services or their location require prior Departmental approval.

22) Student access to computers and technologies described in the application will be maintained throughout the multi-year grant period.

23) The grant recipient will adhere to ACLS assessment policies specific to the ABE Transition to Community College Program, and will ensure that all assessment administrators will acquire and maintain the skills necessary to administer and score the required assessments.

OTHER ASSURANCES:

*The grant recipient assures ESE that:*

24) The grant recipient agrees that program staff will meet all requirements with regard to conference and meeting attendance (e.g., annual Directors’ Meeting, SMARTT trainings, Transition Program meetings).

25) The grant recipient is advised that the ESE retains an unrestricted and irrevocable right to publish and distribute any materials developed under this grant.

26) The grant recipient commits to identifying the ESE in any official correspondence as the entity supporting the delivery of services at the program.

27) The grant recipient will notify the ESE should it find any new performance criteria and/or standards implemented after the inception of the grant performance period to be unacceptable or contradictory to its organizational goals. In such a case, the grant recipient, upon written notification to the ESE, may choose to terminate its commitment to provide the services outlined in its application or in its application as amended by the ESE and to relinquish the remainder of its award. In such a case, any unexpended funds, inappropriately expended funds, and/or funds still on hand will be returned to the ESE within ninety (90) days of the termination of these services.

28) The grant recipient is advised that failure to fulfill the assurances above at any point during the grant cycle may be cause for withholding of payments and/or termination of the grant.

To the best of our knowledge and belief, the application made herein is in accordance with the terms of the Massachusetts State Plan of Title II: The Workforce Investment Act of P.L. 105-220. We agree to comply with all of the preceding assurances and statements and Commonwealth Terms and Conditions. We further agree that funds will be used as stipulated in the application and that supporting documents for expenditures will be made available for audit.

We hereby certify all of the above:

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<th>Typed Name</th>
<th>Signature of Chief Administrative Officer (College President)</th>
<th>Date</th>
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<table>
<thead>
<tr>
<th>Typed Name</th>
<th>Signature of Chairperson of Board of Trustees or Other Governing Body</th>
<th>Date</th>
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Appendix B
FY 2015 Guidelines for Memoranda of Agreement (MOA)
Between ABE Grant Recipients and Partnering Organizations

The memorandum of agreement (MOA) is a written document describing the agreement between the grantee and another organization (working together) to deliver services to undereducated or limited English-speaking adults. The purpose of the MOA is to formalize and clarify the expectations of the grantee and partnering program to provide services.

All parties must commit to fulfilling the requirements outlined in the signed Statement of Assurances and the Massachusetts Guidelines for Effective Adult Basic Education. The MOA must be revisited annually; one original must be signed and dated by all partners and submitted to ACLS; however, with approval from the 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 ESE as soon as possible if funds may be unspent, including funds assigned to a partner. If the grantee anticipates that the will be unexpended by any partner, the grantee will be asked to amend the grant down no later than January, so that the funds can be reallocated as may be needed to other programs.

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 SMARTT 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 per line item at a minimum of three (3) times per year, and must submit invoices monthly
- assurance that contracted partner will notify the grantee and the Department by January of any funds anticipated to be unexpended by the close of the grant period. (This early notification and return of unexpended funds allows the Department sufficient time to reallocate those funds to other programs.)
- 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 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 thirty (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 for MOAs might include, but are not limited to, the following:
- referral of students with SMARTT IDs from one program to another;
- description of any SMARTT requirements include timeliness of data entry;
- referral of tutors to grantee;
- information about dual enrollment;
- review of Cognos data for planning purposes; and
- responsibility to review ACLS mailings and act upon any required policy changes.