###

FY19-FY23 Massachusetts

Policies for Effective

Adult Education

in

Community Adult Learning Centers (CALCs)

and

Correctional Institutions (AECIs)



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

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## **Introduction and Adult Education Glossary**

The FY19-FY23 edition of the [*Massachusetts Policies for Effective Adult Education in Community Adult Learning Centers and Correctional Institutions*](http://www.doe.mass.edu/acls/abeprogram/) (the [*Policies*](http://www.doe.mass.edu/acls/abeprogram/)) serves to help adult educators prepare for the exciting, yet challenging task of operating a Community Adult Learning Center (CALC) or Adult Education in Correctional Institutions (AECI) program. To that end, it provides:

* Basic information about the adult education system in Massachusetts including links to the ACLS data management system[, LACES](https://laces.literacypro.com/laces/), and a glossary of common adult education terms and acronyms posted at [Adult Education Policies](http://www.doe.mass.edu/acls/abeprogram/);
* Explanations of policy requirements for organizations providing instructional services to adult education students: The success of a CALC or an AECI program rests on the effective implementation of policy requirements derived from multiple sources including federal legislation, research and data, and practitioner wisdom and experience. The failure of a program to demonstrate compliance with the policy requirements in this document and in subsequent policy updates throughout the year may have consequences, including but not limited to corrective action, withholding of funds, grant reduction, or grant termination; and
* Links to additional information to facilitate effective service delivery and/or further professional growth and development: These links to additional information are useful to programs developing and implementing high quality and innovative models to increase student outcomes (e.g., [Indicators of Program Quality](https://www.doe.mass.edu/acls/accountability/program-quality/) (IPQs), MassSTEP).

For information on career pathways, see <http://www.doe.mass.edu/acls/acp/>. For the IPQs, see <https://www.doe.mass.edu/acls/accountability/program-quality>. For information on how the IPQs inform program quality reviews, see the [*FY2021 Program Quality Review Protocol*](https://www.doe.mass.edu/acls/accountability/program-quality/reviews.html)*.*

Subsequent to the release of this policy manual and, as needed, ACLS will release an updated version of the [*FY19-FY23 Massachusetts Policies for Effective Community Adult Learning Centers and Correctional Institutions*](http://www.doe.mass.edu/acls/abeprogram/) (i.e., the [*Policies*](http://www.doe.mass.edu/acls/abeprogram/)).

Subsequent to the release of the [*Policies*](http://www.doe.mass.edu/acls/abeprogram/), new policies, policy changes, and policy clarifications will be announced in numbered and labeled policy memos in special mailings. Additionally, links to the announcements will be listed in chronological order below the online policy manual. The naming convention will be ACLS POLICY MEMO followed by:

* + - A number and calendar year: For example, policy number #3-2020 would be the third policy memo released during calendar year 2020; and
		- A descriptive title: For example, if the announcement provides a clarification regarding allowable uses for adult education funds (e.g., use of grant funds for space), the memo might be named Clarification on Use of Grant Funds for Space.

Therefore, the above policy clarification might be named: ACLS POLICY MEMO #03-2020: Clarification on Use of Grant Funds for Space.

## **Overview**

### Department of Elementary and Secondary Education Goal (DESE)

The goal of the Massachusetts public K-12 and adult education (AE) system is to prepare *all* Massachusetts students for success in life. This includes services administered by the [Office of Adult and Community Learning Services](http://www.doe.mass.edu/acls/default.html) (ACLS), part of the DESE’s Center for Educational Options. ACLS is responsible for providing AE services to adults with academic skill levels below grade 12, and/or adults who need English language skills to succeed in our communities.

Our commitment to the educational and workforce success of adult students requires that we promote and support diversity[[1]](#footnote-2), equity[[2]](#footnote-3), and inclusion[[3]](#footnote-4) (DEI) on multiple levels. First and foremost, we must guide and support students as they work to improve their skills in a world that does not always see them as assets and often raises barriers to the achievement of their goals and aspirations.

### Center for Educational Options Mission

*We expand and enhance high quality educational options for learners of all ages, and ensure equitable access for all, especially for those who have been historically underserved.*

### Adult and Community Learning Services Mission

*The Massachusetts adult education 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.*

### The System

The AE system in Massachusetts consists of individual but related organizations working together to create a strong, unified, and aligned system for adult learners seeking greater opportunities for themselves, their families, and their communities. The system is guided by a mission adopted by the Board of Education in 1993 and informed by federal legislation.

The system is effective because of the determined effort and commitment of a network of providers including community adult learning centers (CALCs), correctional institutions (AECIs), transition to community college programs, workplace education programs, and volunteer organizations; staff and students; DESE, the state agency authorized to administer federal and state adult education funds; SABES (the AE professional development (PD) system for Massachusetts); and representative groups including the Directors’ Council, local workforce development boards, community colleges, and others. The Massachusetts Legislature is another important component of the system, providing funding for the delivery and improvement of adult education services statewide. State funding, together with funding authorized by Congress, constitutes the annual AE budget.

### The Workforce Innovation and Opportunity Act (WIOA)

On July 22, 2014, President Obama signed into law the [Workforce Innovation and Opportunity Act](https://www.dol.gov/agencies/eta/wioa/)(WIOA) which revised and reauthorized the Workforce Investment Act of 1998(WIA). The new law supports innovative strategies to keep pace with changing economic conditions and seeks to improve coordination between four core federal programs that support adult education, employment services, workforce development, and vocational rehabilitation activities. The core programs are:

* Adult, Dislocated Worker, and Youth, administered by the Department of Labor (DOL) under Title I;
* Adult Education and Family Literacy Act (AEFLA), administered by the Department of Education (US ED) under Title II;
* Wagner-Peyser Act employment services, administered by DOL under Title III; and
* Vocational Rehabilitation Act, administered by US ED under Title IV.

There are 13 considerations that states are required to use in providing funding to local programs. These considerations drive criteria for evaluating proposals for AE funding. For more information on the 13 WIOA considerations, see Appendix A.

### Innovation and Opportunity

In an effort to promote innovation in programs, ACLS has distilled from its policies only those areas of compliance that are essential to running a program; moreover, these policies have been informed by the Massachusetts [2020-2024 Massachusetts WIOA Combined State Plan](https://www.mass.gov/2020-2024-ma-wioa-combined-state-plan) under WIOA and ACLS’s [IPQs](https://www.doe.mass.edu/acls/accountability/program-quality/) with the goal of facilitating student success in career pathways, postsecondary education, training, and family-sustaining employment. To that end, it is our intent that AE will:

* improve students’ academic skills;
* support the educational and skill achievement of parents and family members to participate in the educational development of their children;
* enhance students’ workforce readiness including digital literacy skills;
* assist low-income job seekers and their families, including individuals with disabilities, veterans, and other populations facing persistent barriers to employment, to achieve economic self-sufficiency; and
* prepare students to meet the demands of the state’s job market.

### Combined State Plan

The [2020-2024 Massachusetts WIOA Combined State Plan](https://www.mass.gov/2020-2024-ma-wioa-combined-state-plan), the product of a multi-year, comprehensive planning process, seeks to provide the best public workforce system in America and reflects the goals adopted as guiding principles for the state.

* First, to make our state workforce programs responsive to the demands of the job market;
* Second, to take up the challenge of better serving the needs of job seekers including adult education students who need to enhance their skills before accessing workforce services;
* Third, to assist low-income job seekers and their families as well as individuals with disabilities, veterans returning from service, and other populations facing persistent barriers to employment, achieve economic self-sufficiency; and
* Finally, to use the federal WIOA measures to track progress and identify areas for improvement going forward.

The [2020-2024 Massachusetts WIOA Combined State Plan](https://www.mass.gov/2020-2024-ma-wioa-combined-state-plan) represents the combined efforts of numerous state and local partners to provide an effective and efficient workforce system for the Commonwealth.

For more information on WIOA, see <http://www.doleta.gov/WIOA>, <http://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/wioa-reauthorization.html>, and <http://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 and beliefs about teaching and learning and guided by research and evidence-based practices with the goal of advancing significant achievement and growth among students.

### Eligibility (State requirement)

ACLS requires that AE students be at least 16 years of age, not enrolled or required to be enrolled in secondary school under state law, and in need of services.

For more information on eligibility, see the Equitable Access chapter.

### Diverse Populations

ACLS identifies diverse populations (e.g., out-of-school youth, individuals experiencing homelessness, incarcerated or formerly incarcerated individuals, families) in need of services to make a smooth transition to education, training, and self-sustaining employment. Programs are required to ensure that their program design facilitates access to career pathways for these populations.

For more information on prioritizing services for diverse populations, see the Equitable Access chapter.

### Program Funding Formula (State requirement)

ACLS grants base awards for the provision of services during the academic year (i.e., September to June[[4]](#footnote-5)) based on a cost per student enrollment of between $2,800 and $3,500 for most programs. Awards are calculated based on the approved cost per student enrolled multiplied by the average monthly student enrollment (e.g., 50 ABE students + 150 ESOL students = 200 enrollments at $3,000 per student = base award of $600,000). (Note: The base funding formula does not include MassSTEP, outstationing, or other funds above and beyond the base award and does not apply to MassSTEP funding.)

ACLS will consider requests for a higher cost per student if the program provides a justification for the higher cost and explains how the higher cost supports quality services and student outcomes. For example, ACLS encourages summer programming, the cost of which could be the rationale for a higher cost per student. Justification could also include intensive instruction, wrap around services, or other design features based on student need.

### Enrollment (State requirement)

CALC and AECI awards include monthly enrollment targets applicable for the period September to June. In order to maintain funded enrollment levels, programs must retain students or enroll new ones as students leave. ACLS considers a program’s average monthly enrollment from September to June relative to its target when evaluating funding and performance and may increase or reduce grant awards based on average monthly enrollment.

Only NRS participants who attend at least one hour in a month count towards monthly enrollment targets. Students are considered NRS participants when their LACES record has all the required intake information including barriers to employment, a valid NRS assessment, and twelve hours of instruction within a period of participation.

For more information on NRS and LACES, see [https://nrsweb.org/policy-data/nrs-ta-guide?utm\_content=&utm\_medium=email&utm\_name=&utm\_source=govdelivery&utm\_term=](https://nrsweb.org/policy-data/nrs-ta-guide?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=%20) and <https://sites.google.com/a/literacypro.com/laces-massachusetts-customizations/ma-laces-manual>.

### 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 both ACLS and non-ACLS funds to fulfill this requirement.)

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

For guidelines on MOA, see Appendix B.

### Intensity and Duration

ACLS requires that program design provide services of sufficient intensity and duration for students to progress[[5]](#footnote-6) 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, volunteers, and co-enrollment.

### No Charges to Students (State requirement)

AE 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.

### Adult Education and Family Literacy Services[[6]](#footnote-7)

ACLS funds a range of services with the goal of facilitating student success in postsecondary education, training, and family-sustaining employment. The following chart summarizes these services.

| **Services offered by CALCs** | **Services offered by AECIs** |
| --- | --- |
| * Adult Basic Education (ABE)[[7]](#footnote-8)
	+ Class levels by ABE EFL[[8]](#footnote-9)
		- 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 Basic Education (ABE)3
	+ Class levels by ABE EFL4
		- 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)
 |
| * Spanish High School Equivalency[[9]](#footnote-10)
 |  |
| * English for Speakers of Other Languages (ESOL)3
	+ Class levels by ESOL EFL4
		- 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 (Pre-Adult Secondary Education/Adult Secondary Education)
 | * MassSTEP ABE (Pre-Adult Secondary Education/Adult Secondary Education)
 |
| * MassSTEP ESOL (English for Speakers of Other Languages)
 |  |

#### **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) (i.e., reflective of the shifts and mathematical practices described in the Curriculum and Instruction chapter of the [*Policies*](http://www.doe.mass.edu/acls/abeprogram/)) 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[[10]](#footnote-11)**

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) (i.e., reflective of the shifts and mathematical practices described in the Curriculum and Instruction chapter of the [*Policies*](http://www.doe.mass.edu/acls/abeprogram/)) 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 and that classroom practices be designed to foster a growth mindset.[[11]](#footnote-12) (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.)

Programs that provide preparation for the HSE assessment (i.e., HiSET, GED) are required to be familiar with the:

* Massachusetts HSE assessment policies posted at <http://www.doe.mass.edu/hse>;
* Academic requirements of the Massachusetts HSE assessments; and
* Websites where students register for the HSE assessments (i.e., <https://ged.com/> and <http://hiset.ets.org/>).

HSE assessment fees must not be charged to AE grants. Programs should address questions about allowable expenses to their assigned ACLS program specialist (PS).

#### **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.

For more information on the Competency Determination standard, see <https://www.doe.mass.edu/mcas/graduation.html>.

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 ADP, see <http://www.doe.mass.edu/hse/adp/>.

**Instruction in L1**

ACLS funds support two models of instruction in students’ first language (i.e., L1) when that language is not English: native language literacy and Spanish HSE preparation.

**Native Language Literacy (State requirement)**

The goal of native language literacy 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. ACLS requires that programs providing native language literacy instruction ensure that students receive instruction in English language acquisition. 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. Native language literacy students should 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).

**Spanish HSE Preparation (State requirement)**

ACLS requires that programs providing preparation for the Spanish HSE[[12]](#footnote-13) ensure that students receive instruction in English language acquisition. This will help students both 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. Spanish HSE students who test at the exit criteria for ESOL should take the MAPT-CCR for pre- and post-testing.

Program design for students preparing for the Spanish HSE 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.

For information on ESOL assessments and the MAPT-CCR, see the Student Progress chapter and the [Massachusetts standardized assessment policies](https://www.doe.mass.edu/acls/assessment/).

#### **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 [*Massachusetts English Language Proficiency Standards for Adult Education*](http://www.doe.mass.edu/acls/frameworks/frameworks.html) ([*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.

#### **MassSTEP ABE**

The MassSTEP ABE model combines pre-ASE and ASE instruction, occupational skills training, and workforce preparation activities[[13]](#footnote-14) concurrently and contextually to increase 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.

#### **MassSTEP ESOL**

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, see <http://www.doe.mass.edu/acls/acp/?section=training>. For more information on ACLS career pathways policies, see <http://www.doe.mass.edu/acls/acp/>.

**Family Literacy Activities[[14]](#footnote-15)**

Family literacy refers to parents[[15]](#footnote-16) and children learning together. Innovative adult education programs can help both generations in the family succeed by building the capacity of students 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.

### Program Delivery Options

CALCs 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 setting.

**Distance Education (DE)**

DE[[16]](#footnote-17) is defined in the National Reporting System (NRS) 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 distance learners through communication via mail, telephone, e-mail, or online technologies and software.[[17]](#footnote-18)

A distance education 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 is considered a DE participant. For NRS reporting, states can count a participant only once, as either a DE participant or a traditional classroom participant.

AE 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 or paper packets. Though learning is asynchronous, it is assumed there is instruction available to students via instructor recorded or other video.
* Blended: A model which “blends” synchronous and asynchronous instruction.

**Hybrid Education (HE)**

HE combines in-person F2F and DE. AE 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 face-to-face 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) or paper packets. 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 Curriculum chapter. For more information on DE instruction, see the Instruction and Assessment chapter. For more information on DE attendance and data collection requirements in LACES, see Appendix C.

#### **Co-enrollment**

Co-enrollment in more than one ACLS-funded program (e.g., a CALC and a Transition to Community College program) 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.

#### **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 the Career Pathways Collaboration chapter and <http://www.doe.mass.edu/acls/wioa.html>.

### Volunteer Services[[18]](#footnote-19)

ACLS supports effective instruction from well-trained and well-supported volunteers provided to students enrolled in CALC and AECI programs. Programs that provide volunteer tutoring services may wish to strategically assign tutors to help students achieve educational functioning level (EFL) completions.

For more information on EFL, see the Student Progress chapter.

### Enrollment and Retention (State requirement)

Programs are funded to enroll and retain a specific number of student enrollments 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 director. (Note: Decreasing the total number of funded enrollments may impact funding.)

### Administrative Costs (State requirement)

Administrative costs are expenses incurred in the day-to-day operations of an organization that are not directly tied to a specific function. Administrative expenses are linked to the organization as a whole as opposed to expenses that are directly related to services.

As defined by the AEFLA and [EDGAR 34 Part 463](https://ecfr.io/Title-34/pt34.3.463) (Subpart C Parts 463.25 and 463.26) not less than 95 percent of funds must be spent on adult education direct services and literacy activities. Programs 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 annually with their continuation applications.

For more information on administrative costs, see the Fiscal and Data Accountability chapter.

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

### 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.

* Programs are required to serve all eligible adults and may, based on their mission, prioritize diverse populations (e.g., out-of-school youth, homeless, families);
* Programs prioritize students in good standing who are transferring from another program. Students enrolled in a CALC or AECI who change jobs, move, or otherwise relocate, must have priority to enroll in another program without returning to the waitlist. If there are no available seats, these students must go to the top of the waitlist;
* Programs prioritize adults who are parents and caregivers of infants, toddlers, preschool, and school-age children; and
* Programs prioritize adults without a high school credential and shared customers who meet Title II eligibility criteria as defined in the local Memoranda of Understanding (MOU) with WIOA partners. Based on regional priorities, programs are required to serve eligible individuals actively engaged in core partner services and who require other partners’ services to advance along a career pathway.

WIOA also 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 (5) years of participation in the program.

For more information on shared customers and corrections education, see <http://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;
* Contact students placed on the waitlist at least annually to determine whether they are still interested in services;
* Remove the names of individuals who cannot be contacted or are no longer interested in services; and
* Verify 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.

For more information on waitlists, see the Fiscal and Data Accountability chapter.

### 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) as it appears on the government issued picture ID the student will be using to register for the HiSET® and/or GED® exam. 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 are expected to complete new intakes for all students, including those who are continuing from the previous year. 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 <http://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.)

#### **Correction**

#### On page 17, the section entitled **Release of Information (ROI) (State requirement)** should read:

ACLS requires that programs ask students to provide their social security numbers (SSN)[[19]](#footnote-20) 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 at DESE and aggregated for federal reports.

Students who sign the revised ROI form consent to have DESE update their 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.

For the ROI form, translated into 30 languages, see <http://www.doe.mass.edu/acls/laces/release-form/>.

#### **~~Release of Information (ROI) (State requirement)~~ Note: See page 16 for correction.**

~~ACLS requires that programs ask students to provide their social security numbers (SSN) and sign an ROI form. Declining to provide an SSN and/or sign an ROI will not impact students’ eligibility for services. The purpose of the ROI is twofold: to inform students that their data will be matched with wage records and to authorize the release of wage record matches to the program.~~

~~ACLS also requires that individuals applying for or receiving services be informed, in writing, that their personal and confidential information will be:~~

* ~~Shared only among the WIOA core program partner staff, subcontractors, and the National Student Clearinghouse; and~~
* ~~Used only for the purpose of conducting a data match and that further disclosure of personal confidential information or records is prohibited.~~

~~For the ROI form, see~~ [~~http://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 provided by adult education programs. 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.

For more information on accommodations, see the Massachusetts AE assessment policies at <http://www.doe.mass.edu/acls/assessment/>. For more information on the ADA, see <http://www.doe.mass.edu/acls/disability/default.html>, <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).

#### **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 or Massachusetts Department of Elementary and Secondary 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.

Six statutory barriers are listed: gender, race, national origin, color, disability, or age. Based on local circumstances, programs should determine whether these or other barriers may prevent students, teachers, or others from such access or participation in the adult education program. The description of steps to be taken to overcome such barriers in the GEPA form need not be lengthy; programs may provide a clear and succinct description of how they plan to address the barriers that are applicable to their circumstances. In addition, the information may be provided in a single narrative. The U.S. Department of Education (US ED) requires that programs submit a GEPA statement annually. ACLS requires programs submit their GEPA statements during the annual refunding process.

For examples of GEPA statements, see [Grant Experts: GEPA Examples](https://www.grantexperts.info/gepa_examples.php) and the [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 table.

| **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)

### 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 continued participation in existing partnerships including, but not limited to, family literacy collaborations.

The [2020-2024 Massachusetts WIOA Combined State Plan](https://www.mass.gov/2020-2024-ma-wioa-combined-state-plan) and [Joint Partner Policy Communications](http://www.mass.gov/massworkforce/issuances/joint-partner-communication/) 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 <http://www.doe.mass.edu/acls/wioa.html>, <http://www.mass.gov/massworkforce/wioa/>, and <http://www.mass.gov/massworkforce/issuances/joint-partner-communication/>.

### Local Workforce Development Plan Packages

Each local MWB will develop a workforce development [local plan package](http://www.mass.gov/massworkforce/wioa/acls/local-plan/). 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

ACLS will fund one outstationed staff person in each of the [16 local workforce areas](http://www.macwic.org/wp-content/uploads/WIB-Map.pdf). Outstationing is the practice of assigning an adult education staff person (usually the education and career advisor) to a MassHire Career Center (MCC) for a set number of hours each week. The adult education staff person, or outstationed coordinator, acts as a liaison between adult education programs in the [local workforce area](https://www.mass.gov/service-details/connect-with-your-local-masshire-workforce-board) and the MCC. The primary role of the outstationed coordinator is to help current and potential adult education students access services by assisting MCC staff with intake, assessments, and referrals to local adult education programs, and help current adult education students access MCC services. The outstationed coordinator may also plan and supervise adult education class field trips to MCCs and make presentations about MCC services to students in adult education classes.

For more information on outstationing, see [http://www.doe.mass.edu/acls/OutstationingPolicy.html](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 the Department of Transitional Assistance (DTA) and/or the Massachusetts Rehabilitation Commission (MRC); and
* ABE/ESOL students who exit AE services and then enroll in a training program funded by a core partner.

For more information on shared customers, see <http://www.doe.mass.edu/acls/wioa.html>.

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

### Standards-aligned Curriculum

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 that 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.[[20]](#footnote-21) The Massachusetts AE system is built on learning standards to which curriculum, instruction, and assessment are required to be aligned. The standards provide clear expectations for students, teachers, and other stakeholders. They also provide a focus for educator growth leading to improved teaching. Building on a foundation of clear expectations and educator effectiveness, standards support higher and deeper levels of learning for students.[[21]](#footnote-22) A curriculum often includes components such as the following:

* Guidance for teachers using the curriculum
* 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
* Sequenced and coordinated lesson plans that make up the instructional units

For scope and sequence, unit plan, and lesson plan templates and curriculum examples and models, see <https://www.doe.mass.edu/acls/frameworks/components.html>.

### College and Career Readiness (State requirement)

The [*College and Career Readiness Standards for Adult Education*](http://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) ([*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf)) are a verbatim subset of the [*Common Core State Standards*](http://www.corestandards.org/). The [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) respond to the critical need of ensuring adult students are able to access family-sustaining employment[[22]](#footnote-23) via postsecondary education and/or training.

* In 2013, Massachusetts adopted the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) as the standards describing what all Massachusetts ABE students should know and be able to do and required ABE curriculum be aligned to these standards.
* In 2019, Massachusetts developed and adopted the [*Massachusetts English Language Proficiency Standards for Adult Education*](http://www.doe.mass.edu/acls/frameworks/frameworks.html)([*MA ELPS*](http://www.doe.mass.edu/acls/frameworks/frameworks.html))*[[23]](#footnote-24)* as the standards describing what all ESOL students should know and be able to do and required ESOL curriculum be aligned to these standards. (Note: The [*MA ELPS*](http://www.doe.mass.edu/acls/frameworks/frameworks.html)combine college and career readiness skills and language skills into a single set of standards for English learners.)

### Curriculum Requirements for ABE[[24]](#footnote-25) (State requirement)

Programs offering ABE instruction in mathematics and English Language Arts/Literacy (ELA), including ACLS-approved forms of distance education (See Appendix C.), 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.

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 (Alphabetics is the process readers use to identify words.);
* Read fluently (Fluency is the ability to read accurately, at an appropriate rate, and with prosody. Reading fluently includes oral reading skills.);
* Possess sufficient background knowledge and vocabulary to foster reading comprehension (Vocabulary is the body of words whose meanings a person knows and understands.); and
* Develop active strategies to construct meaning from print (Reading comprehension is the process and product of understanding text and requires a high level of metacognitive engagement with the text.).

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 reading instruction to adult learners at all levels.

For more information on the essential components of reading instruction, see [Essential Components of Reading](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/essential-components-reading.pdf).

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 together are the foundation of evidence-based reading practices. Among them are:

* The essential components of reading are alphabetics (i.e., phonemic awareness, phonics, decoding), fluency, vocabulary, and comprehension.
* Learners’ strengths and weaknesses are diagnostically assessed in each of the four components.
* Instruction is differentiated (e.g., student groups) based on the results of the diagnostic assessments of reading.
* Instruction is systematic, sequenced, direct, and explicit. Explicit instruction includes teacher explanation, teacher modeling, guided practice, and application.
* Instruction and materials are engaging and relevant to learners’ needs.
* Instruction is continuously monitored, by teachers and learners, to gauge its effectiveness.

EBRI practices for primary focus differ according to students’ EFL as indicated in the following table.

| **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 how to assess students’ reading strengths and needs, and how to teach to these needs, see the [SABES English Language Arts Curriculum and Instruction PD Center](https://www.sabes.org/pd-center/ela) website and PD [calendar](https://www.sabes.org/calendar).

**Student Achievement in Reading (STAR)[[25]](#footnote-26)**

STAR is an evidence-based reading instruction program that specifically targets the needs of intermediate-level readers (i.e., Low Intermediate Basic Education and High Intermediate Basic Education Levels). STAR is supported by years of research in reading methodology. The research found that intermediate level adult learners struggle with one or more reading components: alphabetics, fluency, vocabulary, and/or comprehension. An EBRI approach requires teachers to use diagnostic assessments to identify learners' individual strengths and weaknesses and target reading instruction accordingly.

The [Office for Career, Technical, and Adult Education](http://www2.ed.gov/about/offices/list/ovae/index.html) (OCTAE) of US ED developed and promotes the use of STAR. Programs opting to use the STAR model must participate in the STAR training and complete all training components in order to maintain fidelity to the evidence base and to be a certified STAR teacher.

For more information on the components of reading, EBRI, and STAR, see [Essential Components of Reading](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/essential-components-reading.pdf), [ACLS EBRI and STAR information](http://www.doe.mass.edu/acls/rfp/star.html), and 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 (See Appendix C.), are required to implement curriculum aligned to the [*Massachusetts English Language Proficiency Standards for Adult Education*](http://www.doe.mass.edu/acls/frameworks/frameworks.html)*(*[*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 context them within the lens of English language learning. ACLS also requires that ESOL programs integrate civics education at all levels.

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 Voxy 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 the [SABES ESOL Curriculum and Instruction PD Center website](https://www.sabes.org/pd-center/esol) and the [WIOA Brief on English Language Acquisition](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/english-language-acquisition.pdf).

### Curriculum Requirements for Distance Education

Programs offering ACLS-approved forms of distance education (See Appendix C.) are required to align their curriculum and instruction to the CCRSAE 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 Voxy) 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.

### Curriculum Requirements for All Programs

**Workforce Preparation Activities**

WIOA requires all programs to integrate workforce preparation activities in curriculum and instruction at all levels in order to teach employability skills and prepare students for college and career pathways. The term “workforce preparation activities” means: “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 or training, or employment.”[[26]](#footnote-27)

**Digital Literacy Development**

WIOA requires all programs to support the digital literacy development of students at every level. Digital literacy can be defined as the skills associated with using technology to enable users to find, evaluate, organize, create, and communicate information. 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 activities, see the ACES Transitions Integration Framework at <https://atlasabe.org/key-activities/aces/> and the Perkins Collaborative Resource Network’s Employability Skills Framework at <http://cte.ed.gov/initiatives/employability-skills-framework>.

For more information on digital literacy development, see the *IDEAL Distance Education and Blended Learning Handbook* at <https://edtechbooks.org/ideal_dl_handbook> and *Digital Literacy: A Guide for Adult Education Programs* at <http://www.doe.mass.edu/acls/frameworks/DigitalLiteracy.html>.

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

### Alignment to Standards (State requirement)

ACLS requires curriculum and 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[[27]](#footnote-28)

The shifts in standards-based ELA[[28]](#footnote-29) teaching sharpen the focus of instruction on the close connection between comprehension of text and acquisition of knowledge:

* Complexity (i.e., regular practice with complex text and its academic language);
* Evidence (i.e., reading, writing, and speaking grounded in evidence from text, both literary and informational); and
* Knowledge (i.e., building knowledge through content-rich nonfiction).

The shifts in standards-based mathematics[[29]](#footnote-30) teaching center on the knowledge and skills students need to master to be adept at understanding and applying mathematical ideas:

* Focus (i.e., focusing strongly where the standards focus);
* Coherence (i.e., designing learning around coherent progressions from level to level); and
* Rigor (i.e., pursuing conceptual understanding, procedural skill and fluency, and application with equal intensity).

Equally important, the Standards for Mathematical Practice[[30]](#footnote-31) “describe the ways students are to engage with the subject matter as they grow in mathematical maturity and expertise across the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) levels.” The practices and habits of mind that all mathematics students need to develop, are:

* MP.1: Make sense of problems and persevere in solving them;
* MP.2: Reason abstractly and quantitatively;
* MP.3: Construct viable arguments and critique the reasoning of others;
* MP.4: Model with mathematics;
* MP.5: Use appropriate tools strategically;
* MP.6: Attend to precision;
* MP.7: Look for and make use of structure; and
* MP.8: Look for and express regularity in repeated reasoning.

### Integration of Workforce Preparation Activities and Digital Literacy Development

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

For definitions of workforce preparation activities and digital literacy, see the Curriculum chapter.

The following at-a-glance chart summarizes Massachusetts instruction requirements.

|  |  |  |
| --- | --- | --- |
|  | **ABE Instruction** | **ESOL Instruction** |
| Aligned to CCRSAE | X |  |
| Aligned to MA ELPS |  | X |
| Components of Reading | X |  |
| Workforce Preparation | X | X |
| Digital Literacy | X | X |

### High Quality Resources for Instruction

A lack of mathematics skills can be a significant barrier for adult learners in achieving a high school equivalency or gaining access to postsecondary education. Programs looking for mathematics curriculum resources may be interested in the Curriculum for Adults Learning Math (CALM). CALM is a high quality, CCRSAE-aligned mathematics curriculum for all adult education levels. CALM instructional units include complete lesson plans, formative assessments for each lesson, and a performance-based assessment. CALM aligns to the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) and the Standards for Mathematical Practice and reflects the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) instructional shifts. CALM prepares students for earning a high school equivalency credential and lays the foundation for college and career readiness.

For more information on CALM and other math resources, see the [SABES Mathematics Curriculum and Instruction PD Center website](https://www.sabes.org/pd-center/math-and-numeracy). For ELA and ESOL curriculum and instruction resources, see the SABES Curriculum and Instruction [ELA](https://www.sabes.org/pd-center/ela) and [ESOL](https://www.sabes.org/pd-center/esol) Center websites.

The Teaching the Skills That Matter in Adult Education project (TSTM), a project from the American Institute for Research (AIR) and OCTAE trains teachers to integrate the **skills** that matter to adult students using **approaches** that work across critical **topics**. Using the project's tools and training, AE teachers can teach the transferable skills students need in these critical contexts.

For more information on TSTM including the TSTM toolkit and other resources, see <https://www.sabes.org/content/teaching-skills-matter-massachusetts-adult-education>.

### Assessment

Assessment refers to a wide variety of methods and tools used by educators to evaluate, measure, and document the academic readiness, learning progress, skill acquisition, and educational needs of students.[[31]](#footnote-32)

Effective teachers use assessment data to inform lesson planning, check for understanding regularly throughout the lesson, create and administer tests that measure students’ academic learning and progress towards goals, provide students with actionable and timely feedback, make progress visible to students, and use assessment data to modify instruction to better meet students’ needs.

Indeed, “done well and thoughtfully, assessments are tools for learning and promoting equity. They provide necessary information for educators, families, the public, and students themselves to measure progress and improve outcomes for all learners. Done poorly, in excess, or without clear purpose, they take valuable time away from teaching and learning, draining creative approaches from our classrooms.  In the vital effort to ensure that all students in America are achieving at high levels, it is essential to ensure that tests are fair, are of high quality, take up the minimum necessary time, and reflect the expectation that students will be prepared for success in college and careers.”[[32]](#footnote-33)

### Formative Assessment

Formative assessment methods and tools measure specific elements of learning (e.g., the level of knowledge a student already has about the concept or skill the teacher is planning to teach or the ability to comprehend and analyze different types of texts and readings). Formative assessment is also used to identify individual student weaknesses and strengths so that educators can provide differentiated academic support.[[33]](#footnote-34)

ACLS does not require that programs use formative assessment to measure student learning, but high quality programs use diverse assessment methods and tools to monitor learning and adapt instruction including formative assessment.

For more information on formative assessment, see the [resource library](https://www.sabes.org/resources) on the SABES website.

### Summative Assessment

Summative assessments are 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.[[34]](#footnote-35) Examples of summative assessments include tests, performance tasks, portfolios, final exams, and standardized assessments.

ACLS requires that programs use Massachusetts-approved standardized assessment (i.e., required NRS tests that states receiving federal AE funding must use) to report educational gain. According to the NRS, 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.

For more information on standardized assessment requirements, including assessment of DE learners, see the Student Progress chapter, the [ACLS Assessment Policies Manual](https://www.doe.mass.edu/acls/assessment/), and the [ACLS Test Help blog](https://blogs.umass.edu/aclstesthelp/).

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

To ensure that adult education 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 (EFL), attain high school equivalency (HSE) credentials, enroll in postsecondary education and/or training (PSE/T), and have viable careers. The ACLS vision for adult education focuses on outcomes in order for programs to continue to support students on their pathways to success. Moreover, WIOA ensures access to education and workforce services for individuals with barriers to employment through increased accountability among states that receive federal AE funding.

### Summative Assessment

States that receive federal money to support adult education programs are required to report on the educational gain made by students. This data is submitted annually via the [National Reporting System](http://www.nrsweb.org/) ([NRS](http://www.nrsweb.org/)), developed by the [Office for Career, Technical, and Adult Education](http://www2.ed.gov/about/offices/list/ovae/index.html) ([OCTAE](https://www2.ed.gov/about/offices/list/ovae/index.html)) of the U.S. Department of Education (US ED). 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 adult education program. This goal is the reason that all participants in [LACES](https://laces.literacypro.com/laces/) are included in the [NRS](http://www.nrsweb.org/) educational gain measure.

The [NRS](http://www.nrsweb.org/) approach to measuring educational gain is to define a set of educational functioning levels (EFL) in which students are initially placed when they enter the program based on their abilities to perform literacy-related tasks in content areas. After a set period of time or number of instructional hours set by the state, students are again assessed to determine their skill levels. If students’ skills have improved sufficiently to be placed in one or more higher levels, a completion[[35]](#footnote-36) is recorded. This process occurs every fiscal year, between July 1 and June 30.

For more information on the [NRS](http://www.nrsweb.org/) and EFL, see <https://nrsweb.org/> and <https://nrsweb.org/sites/default/files/NRS-TA-Guide82019.pdf>.

### Required Assessments (State requirement)

ACLS requires that programs comply with statewide assessment policies including policy changes as they are issued. Programs not in compliance with required policies will be required to develop a corrective action plan and resolve areas of non-compliance.

Lack of knowledge of current assessment policies may result in missed opportunities to capture student outcomes. For example, programs should be aware that, while 65 hours (40 hours for students in correctional institutions) are required between pre- and post-tests, programs are allowed to post-test students at fewer than 65 hours as along as this decision is justified and documented.

For more information on assessment policies, see <http://www.doe.mass.edu/acls/assessment/>. For more information on standardized assessment, see the Student Progress chapter and the [ACLS Test Help blog](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 adult education program.)

Annually, programs are assigned separate ABE and ESOL targets using a formula that incorporates (i.e., is weighted on):

1. The number of students who pre-test into each of the [NRS levels](https://nrsweb.org/sites/default/files/NRS-TA-Guide82019.pdf) that the program serves, and
2. ACLS performance goals for each [NRS level](https://nrsweb.org/sites/default/files/NRS-TA-Guide82019.pdf) derived from the federal target assigned to Massachusetts and adjusted to account for our state’s system which awards partial credit (explained below) and the likelihood, based on past data, of meeting the federal target.

Program performance is the program's actual MSG relative to its target. For example, an ESOL program with a target of 45% and an actual MSG of 50% has exceeded its target by 11%; its performance is 111% relative to target. The performance of another program with a target of 55% and an actual MSG of 50% is 91% relative to target.

Programs get an *initial* credit (i.e., 1.0) for the first MSG outcome earned and *partial* credit (i.e., 0.1) for each *additional outcome* earned beyond the *initial*. If a student in a program achieves an initial outcome and two additional outcomes, then the program's credit for that student is 1.2. Only outcomes achieved during the fiscal year are included in MSG.

MSG outcomes, both initial and additional (i.e., partial), can be any of the following:

* Educational Functioning Level (EFL) completion
* [High School Equivalency (HSE) credential attainment](http://www.doe.mass.edu/hse/)
* Postsecondary Education or Training (PSE/T) enrollment after exit

These examples show how programs earn initial and partial credit for student outcomes.

|  |
| --- |
| **Examples of How Credit for Outcomes is Earned** |
| * Two (2) EFL completions (i.e., advancement in two NRS levels) by a student = 1.1
 |
| * EFL completion in two (2) subject areas (e.g., reading, mathematics) = 1.1
 |
| * High school equivalency (HSE) credential attainment and two EFL completions = 1.2
 |
| * Two (2) EFL completions in two (2) subject areas plus enrollment in postsecondary education or training (PSE/T) after exit = 1.4
 |

For more information on MSG, see <https://www.doe.mass.edu/acls/accountability/outcomes/msg.html>.

### MSG Targets (State requirement)

ACLS posts preliminary ABE and ESOL program targets after summer and fall pre-tests have been entered into [LACES](https://laces.literacypro.com/laces/). Targets may change *slightly* over the course of the year since one of two factors in an MSG target is the number of students who pre-test into each of the program's NRS levels and pre-testing continues throughout the year.

For more information on LACES, see <http://www.doe.mass.edu/acls/laces/>. For more information on MSG and the Massachusetts performance accountability system, see <https://www.doe.mass.edu/acls/accountability/outcomes/msg.html> and [https://www.doe.mass.edu/acls/accountability/.](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[[36]](#footnote-37) 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.” Light[[37]](#footnote-38) supports that notion, noting further that “Good advising may be the single most underestimated characteristic of a successful college experience.”

### 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.

To assist agency directors, coordinators, advisors, and program staff with enhancing advising services, the SABES Program Support PD Center developed the [*Effective Practices Aligned with Indicator of Program Quality (IPQ) #6*](https://www.doe.mass.edu/acls/ecp/) guide. The guide aligns with the Advising and Support Services [Indicator of Program Q](https://www.doe.mass.edu/acls/accountability/program-quality/)uality (i.e., IPQ six) and includes examples of effective practices for each of the indicator's standards. ACLS encourages AE programs to use the guide to review and evaluate current advising and support services policies and practices.

### Advising for Out-of-School Youth

ACLS requires that adult education staff, typically the education and career advisor, meet with all students aged 16 to 22[[38]](#footnote-39) to discuss the students’ educational options (i.e., adult education, return to K-12) prior to enrolling. In the event that a student wishes and is eligible to return to K-12, the advisor will work with the school to facilitate the student’s re-entry into the K-12 system.

For students aged 16-24, the education and career advisor will provide students with up-to-date written information about the Title I youth programs and services offered by partners in the local area. In the event that a student expresses an interest, the advisor will work with the partner(s) to facilitate access to programs and services.

### Advising for Parents and Family Members

Adult education students who have education and career goals may also want to set goals in their roles as parents and family members. A young mother, for example, may have a goal of obtaining her high school equivalency credential and going on to community college at the same time she wants to help her daughter be ready for kindergarten, communicate effectively with her daughter’s teacher, and/or attend parent-teacher conferences. Programs may integrate family goals into advising materials and tools they are already using or provide separate materials and tools.

Students who choose not to set education and career goals may wish to develop a family education plan focused on their goals as parents or family members. These students must still have the option to add education and career goals to their family education plans at any time.

For more information on advising, see the [SABES Program Support PD Center](https://www.sabes.org/pd-center/program-support).

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

### Program Governance (State requirement)

ACLS requires that programs provide accountability to an active governing board (i.e., Board) which has decision making authority including fiduciary responsibility for the organization and whose membership is different from and not related to 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 executive 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 a grant from DESE will be held accountable for communicating with, monitoring the grant spending and data reporting of, and overseeing the grant activities of all sites and subgrantees. Grantees that fail to abide by federal and state fiscal and data policies, including sites and subgrantees, will face consequences including but not limited to conditional funding, corrective action, withholding of funds, grant reduction, or grant termination.

For more information on grantee responsibilities, see the Data and Fiscal Accountability chapter.

### Facilities (State requirement)

ACLS requires that grantees operate AE 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 programs ensure the privacy and security of PII and advising spaces, and that sufficient up-to-date technology is readily available for all staff.

### Technology (State requirement)

WIOA requires that all programs support the digital literacy development of students at every level. Programs are expected to incorporate a variety of tools and technologies into the classroom to support learning including remote learning. ACLS requires that sufficient up-to-date technology be readily available for all students.

### Salaries and Benefits (State requirement)

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

Administrator

* With fringe: $30.00
* Without fringe: $39.00

Professional

* With fringe: $22.00
* Without fringe: $28.00

Support Staff

* With fringe: $17.00
* Without fringe: $21.00

ACLS requires that programs compensate staff for all job responsibilities including paid professional development and prep time for teachers.

### Administrator Qualifications (State requirement)

ACLS requires that administrators meet the minimum required qualifications below. When there is a change in program leadership (i.e., the person responsible for the overall management of the program), programs should notify ACLS and submit a copy of the new director’s resume.

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. (Note: Preferred qualifications for administrators are a bachelor’s or master’s degree in education, administration, or related field and three years of experience in education.)

### Staff Qualifications (State requirement)

ACLS requires that all teachers have, at a minimum, a bachelor’s degree. (Note: Preferred qualifications for teachers are a bachelor’s or master’s degree and teaching license/certificate; a bachelor’s or master’s degree in the content area they teach; or a bachelor’s or master’s degree in education.) ACLS also requires that programs establish minimum qualifications for advisors.

## **Chapter 9:** [**Indicator 9: Educational Leadership**](#_Toc468698127)

Educational leaders matter. They help the programs they lead navigate challenging environments, align curriculum to learning standards, 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 the conditions that enable powerful teaching and learning to occur. They:

* Promote the collaborative creation, shared understanding of, and commitment to the program's mission, vision, and core values within the program and align all program decisions, practices, policies, and resources to the program's mission and vision;
* Assure the alignment of intellectually challenging curriculum to required state learning standards, research-based instructional practices, and formative and summative assessments to promote all students’ academic success;
* Create and support a diverse, equitable, and inclusive environment;
* Promote reflection, shared responsibility, and clear communication while maintaining high expectations for all;
* Use the [AE professional standards](https://www.doe.mass.edu/acls/edueffectiveness/)39 to provide on-going observation and supervision and ensure that all teachers design and deliver high quality curriculum and instruction;
* Build the individual and collective capacity of the entire staff through differentiated supervision, coaching, and evaluation practices and cultivate a program culture of continuous improvement and reflective growth for self and staff;
* Collect and analyze a variety of instructional, program, and regional data to inform decisions; and
* Engage in a continuous improvement planning process that involves all stakeholders, including students, and incorporates their feedback, reflections, and recommendations for improvement.

For more information on educational leadership, see Appendix C and the [SABES Program Support PD Center](https://www.sabes.org/pd-center/program-support).

### New Staff

ACLS provides an annual multi-session New Directors’ Orientation (NDO) that includes information and resources designed to support the effective operation of a program. NDO agendas in previous years have included presentations, tours of the [ACLS website](https://www.doe.mass.edu/acls), reviews of the [*Policies*](https://www.doe.mass.edu/acls/abeprogram/) including Indicators of Program Quality (IPQs) and LACES data collection, presentations from [EdGrants](https://www.doe.mass.edu/grants/edgrants.html) staff, and one to one meetings with PS. While the NDO is not required, new and veteran directors alike report that participation in the NDO is useful, so much so that directors in their second year often request permission to participate for a second time. [SABES](http://sabes.org/) also provides supports for new directors.

ACLS does not require new teachers or advisors to participate in mandatory training. However, [SABES](http://sabes.org/) provides resources, technical assistance, and PD specifically designed to support new teachers and advisors.

### High Quality Resources for PD

PD is a strategy used to enable educators to expand and refine their practice and impact student learning. High quality PD (HQPD) is PD that addresses the unique context of adult education and provides coherent learning experiences that are systematic, purposeful, and structured over a sustained period of time. It is provided by highly knowledgeable content experts and is based on student-centered, data-driven goals and objectives.

High quality resources include the Professional Adult Educator online course for new and experienced teachers learning to use the Massachusetts professional standards for [ABE](https://www.doe.mass.edu/acls/edueffectiveness/) and [ESOL](https://www.doe.mass.edu/acls/edueffectiveness/) teachers to enhance their teaching practice. For advisors, high quality resources include the Art of Advising for staff who are new to the role of education and career advising and the regional facilitated Advisor Sharing and Learning Group meetings. Programs may create opportunities for staff – directors, teachers, and advisors – to participate in HQPD individually and/or in teams to ensure that all students are prepared for further education and/or training.

For more information on PD and HQPD, see <http://www.doe.mass.edu/acls/pd/> and [SABES](http://sabes.org/).

### Professional Standards

Massachusetts AE students deserve high quality, standards-based instruction provided by effective, self-reflective teachers dedicated to improving teaching practice and achieving student outcomes.

The [Massachusetts Professional Standards for Teachers of Adult Basic Education](http://www.doe.mass.edu/acls/edueffectiveness/) and the [Massachusetts Professional Standards for Teachers of English for Speakers of Other Languages](http://www.doe.mass.edu/acls/edueffectiveness/), developed by ACLS staff, SABES staff, and adult education practitioners, describe what is important for adult education teachers of ELA, mathematics, and ESOL to know and be able to do. These standards cover topics such as subject matter knowledge, second language acquisition, curriculum planning and instructional delivery, student engagement and differentiated instruction, instilling a growth mindset, and meeting the diverse needs of learners. The standards can also be used by directors to inform hiring, observing, and/or evaluating teachers, as well as by teachers for reflecting on their own practice.

Based on the Massachusetts Professional Standards for Teachers of Adult Basic Education and to help the standards come alive, proficiency guides for teachers of ELA and mathematics were developed. These guides describe practical considerations for putting the standards into practice and essential concepts teachers should know and be able to do specific to their discipline. The sample indicators of knowledge and application charts in the Massachusetts Professional Standards for Teachers of English for Speakers of Other Languages include practical sample applications of what ESOL teachers should know and do to be more effective and, therefore, serve as both the standards and the proficiency guide for ESOL.

The figure below shows the relationship between the Massachusetts Professional Standards for Teachers of Adult Basic Education, ELA and mathematics proficiency guides, and the Massachusetts Professional Standards for Teachers of Adult Speakers of Other Languages.



Includes ESOL proficiency guide e

### Educator Growth and Effectiveness

The Educator Growth and Effectiveness (EGE) cycle is a teacher-centered process supported by ACLS and SABES by which teachers develop proficiency in the professional standards and engage in the work of improving teaching practice in order to achieve student outcomes. The year-long cycle begins with a planning phase, followed by a self-assessment of current practice. Based on the self-assessment, teachers set goals and draft professional learning plans. Throughout the cycle, the EGE coach meets with and conducts mini observations of participating teachers. At the end of the cycle, the coach and the teacher use an assessment rubric and evidence of practice gathered by the teacher to determine the teacher’s progress in meeting proficiency in the professional standards. SABES provides PD for directors, coaches, and teachers that describes the benefits of using the EGE cycle and shows how to use the EGE model to strengthen their programs and achieve student outcomes.

For more information on resources for teacher growth, see [Educator Effectiveness](http://www.doe.mass.edu/acls/edueffectiveness/default.html) and the [SABES PSPD center](https://www.sabes.org/pd-center/program-support).

### Staff Supervision and Evaluation (State requirement)

Effective criteria and systems for staff evaluation are critical to the success of AE programs. Before teachers begin the daily work of teaching, it is essential that the criteria and process through which their performance will be measured are clearly defined and communicated to them.

ACLS requires that programs use a process to evaluate teacher effectiveness. This process must include regular staff evaluations, at a minimum annually, and classroom observations with written and actionable feedback and follow-up. The program director may conduct staff evaluations and classroom observations and provide written feedback, or may assign a qualified staff person (e.g., lead teacher with content expertise) to conduct them.

Programs have the option of choosing the staff growth and evaluation process they implement. Examples include the EGE cycle and the systems required by Massachusetts school districts and community college unions.

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

Organizations that accept funds (i.e., a contract, a grant) from DESE 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 that fail to abide by federal and state fiscal and data policies will face consequences including but not limited to conditional funding, corrective action, withholding of funds, grant reduction, or grant termination.

For information on accountability for student outcomes, see the Student Progress chapter.

### 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 memorialized 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 by budget line 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 (FR-1). 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/cgi-bin/text-idx?node=2:1.1.2.2.1.5&rgn=div6). By maintaining such an accounting system, grantees ensure that all grant funds are expended according to applicable regulations.

For administrative and programmatic guidance, see the Hierarchy of Applicable Regulations in Appendix D.

Grantees may budget for subawards[[39]](#footnote-40) 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.

For more information on subawards, see Appendix E.

### 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 budget line amounts if necessary (i.e., over 10% or $10,000), obtain approval from ACLS in a timely manner, and avoid unapproved overruns. Unapproved overruns are questionable costs and may result in DESE requesting the return of those funds;
* Record grant funds and required matching funds separately in the grantee’s accounting system. Comingling of funds is not an accepted practice; and
* 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 and is generally charged on a line item basis, 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/cgi-bin/text-idx?SID=393301a7cdccca1ea71f18aae51824e7&node=34:1.1.1.1.23&rgn=div5) 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/cgi-bin/text-idx?SID=a32963af34d3c94b854882a21e8d77e9&mc=true&node=se2.1.200_162&rgn=div8), 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 ensuring funds maintained and funds drawn down by the grantee are for expenditures that have been incurred or will be incurred in a reasonable time frame. 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: Assets and technology
* 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

#### **Record Retention**

Grantees and subcontractors of DESE must abide by [the Commonwealth of Massachusetts Regulation, 815 CMR 2.00 State Grants, Federal Grant Awards, Federal Subgrants, and Subsidies](https://www.mass.gov/regulations/815-CMR-2-state-grants-federal-grant-awards-federal-subgrants-and-subsidies). The regulation requires that all DESE grant and subsidy recipients maintain all files, records, and documents related to the program. This includes all financial and program records, 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, visit the [Commonwealth of Massachusetts Secretary of State Electronic Records Guidelines](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 by the deadlines specified in the DESE grants accounting system, [EdGrants](http://www.doe.mass.edu/grants/edgrants.html). Failure to meet the specified deadlines may delay grant approvals.

DESE also uses WizeHive, a flexible solution for addressing ACLS information collection needs including grant information. ACLS will send links and instructions for using WizeHive to grantees as needed.

For more information on grants, see [Grants for Schools: Getting Them and Using Them, A Procedural Manual](http://www.doe.mass.edu/grants/procedure/manual.html) and [EdGrants: User Guides, Information and Trainings](http://www.doe.mass.edu/grants/edgrants.html).

### 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](http://www.ecfr.gov/cgi-bin/text-idx?SID=a6c2c8372201a3d15a4398267c3500f1&mc=true&node=sg34.1.76_1534.sg9&rgn=div7) for further guidance.

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

As per [2 CFR Part 200.306](https://www.ecfr.gov/cgi-bin/text-idx?SID=c16296aecfef71d582e0634cf6658cf1&node=2:1.1.2.2.1.4.29.7&rgn=div8), 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; and
* 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 and included in [LACES](https://laces.literacypro.com/laces/). If a program uses match to fund one or more classes, 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; and
* Space may be claimed as match. 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.

### 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/cgi-bin/text-idx?node=se2.1.200_1501&rgn=div8), 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/cgi-bin/text-idx?node=2:1.1.2.2.1.4.31&rgn=div7), 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

AE grantees must be familiar with [grants management information](http://www.doe.mass.edu/grants/essential.html), submit applications that follow the “line item” structure in [EdGrants](http://www.doe.mass.edu/grants/edgrants.html), and use official [grants management forms](http://www.doe.mass.edu/grants/procedure/default.html) and/or ACLS required forms as identified in individual Requests for Proposals (RFP). They must also abide by rules related to administrative costs and meet DESE deadlines including the rule that all fiscal requirements that apply to DESE grant funds also 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. 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.

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. DESE will not grant administrative cost requests that exceed 25 percent of grant funds. Grantees must keep in mind that charges for IDC are included in the program’s administrative costs.

When preparing budgets, grantees must keep in mind the specific line item costs that are included in the calculation of administrative costs are Lines 1, 3, 4 (as it relates to Lines 1 and 3), 9, and 10.

#### **Budget Information Line by Line**

Allowable costs under all line items 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.

For more information on grant budgets, see <http://www.doe.mass.edu/grants/essential.html> and Budget Information Line by Line in Appendix F.

#### **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 the [EdGrants](http://www.doe.mass.edu/grants/edgrants.html) platform. State agencies and correctional facilities are set up with an account in MMARS via an Interagency Service Agreement (ISA), to use their funds. Grantees should not draw down funds if expenditures have not occurred or will not occur in a reasonable time period.

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.

For more information on grant management and [EdGrants](http://www.doe.mass.edu/grants/edgrants.html), see <http://www.doe.mass.edu/grants/procedure/manual.html> and <http://www.doe.mass.edu/grants/edgrants.html>.

#### **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 prior to submitting an amendment electronically via [EdGrants](http://www.doe.mass.edu/grants/edgrants.html). Failure to meet assigned submission deadlines will delay grant processing and receipt of funds by the grantee.

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.

* For state grants, funds must be obligated by June 30 and expended no later than 60 days after the approved project end date.
* For federal grants, funds must be spent by August 31 and expended no later than 60 days after the approved project end date.

Unexpended funds above $1.00 must be returned with the final financial report (i.e., FR-1) each year. The FR-1 must be filed 60 days after the close of the grant. Expenditures reported on the FR-1 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 the grantee maintain supporting documentation to support all filed FR-1’s.

Grantees must notify their program specialist (PS) as soon as possible 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 DESE 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 DESE 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. The checklist assures DESE that attendance recorded in [LACES](https://laces.literacypro.com/laces/) for classes funded by DESE are supported with attendance records maintained by the grantee. Attendance not accurately reported 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.

#### **Data Entry**

All data, including intakes, assessment, student attendance, and other information as the need arises must be entered into [LACES](https://laces.literacypro.com/laces/) in a timely manner according to a fixed, regular schedule. Data entry must be consistent with program records in the grantee’s files.

Programs 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.

For more information on data entry and desk reviews, see <https://www.doe.mass.edu/news/news.aspx?id=25707>.

#### **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., classroom attendance);
* one on one volunteer tutoring time outside of scheduled classes;
* distance learning attendance as proxy seat time (i.e., clock time model, learner mastery model); and
* blended learning (also known as hybrid learning) attendance as a combination of classroom attendance and proxy seat time.

#### **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.

Five times per year, on a schedule announced by ACLS, programs are required to submit a desk review workbook via an online portal on the [LACES](http://www.doe.mass.edu/acls/laces/) page of the ACLS website. Desk review submissions are logged and reviewed for accuracy and/or areas of concern (e.g., low enrollment). As needed, PS will contact their programs to discuss the data. Desk reviews include enrollment, assessment, employment, financial outcomes, and, if applicable, IET sheets.

#### **Follow-up for Federal WIOA Measures**

The NRS 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, 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;
* contact students placed on the waitlist at least annually to determine whether they are still interested in services;
* remove the names of individuals who cannot be contacted or are no longer interested in services; and
* verify 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.

## **Appendix A: The 13 WIOA Considerations**

The Adult Education and Family Literacy Act (AEFLA) of Title II provides foundation skills and English literacy instruction to nearly 1.8 million individuals nationwide each year. Realizing the WIOA vision required that eligible agencies (i.e., state education agencies) shall consider the following 13 considerations in awarding grants or contracts under this section going forward:

1. The degree to which the eligible provider would be responsive to (A) regional needs as identified in the local plan under section 108 and B) serving individuals in the community who were identified in such plan as most in need of adult education and literacy activities, including individuals—(i) who have low levels of literacy skills; or (ii) who are English learners;
2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
3. Past effectiveness of the eligible provider in improving the literacy of eligible individuals, to meet state-adjusted levels of performance for the primary indicators of performance described in section 116;
4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the H. R. 803—195 strategy and goals of the local plan under section 108, as well as the activities and services of the one-stop partners;
5. Whether the eligible provider’s program—(A) is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and (B) uses instructional practices that include essential components of reading instruction;
6. Whether the eligible provider’s activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice;
7. Whether the eligible provider’s activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;
8. Whether the eligible provider’s activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship; include the essential components of reading instruction;
9. Whether the eligible provider’s activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the state, where applicable, and who have access to high quality professional development, including through electronic means;
10. Whether the eligible provider’s activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, non-profit organizations, and intermediaries, for the development of [career pathways](http://www.clasp.org/resources-and-publications/files/aqcp-framework-version-1-0/Section2.pdf);
11. Whether the eligible provider’s activities offer flexible schedules and coordination with federal, state, and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;
12. Whether the eligible provider maintains a high quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance; and
13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

## **Appendix B: 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 *Policies*. 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 ACLS PS, 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 per line item at 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 allows 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 for MOA might 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/or
* responsibility to review ACLS mailings and comply with policy changes.

## **Appendix C: Distance Education**

**Types of Distance Learning – Instruction**

|  |
| --- |
|  **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**

| **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**

|  |
| --- |
| **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, VOXY, 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. | Packets of Learning Activities are given to students, students complete work and return packets 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**

| **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 curriculum and instruction in DE, see Chapters 4 and 5.

## **Appendix D: Sample Calendar for Educational Leaders**

| This timeline summarizes key practices of educational leaders that can serve as the basis of a program calendar. Most can be adjusted to fit individual program needs but ACLS requires the time-sensitive practices in *italics*. |
| --- |
| **Ongoing** | * Communicate with assigned program specialist (PS)
* Recruit, intake, and orient students
* Review Indicators of Program Quality (IPQ) and use to inform planning with staff
* Review qualitative and quantitative data and use to inform planning with staff
* Engage all stakeholders in a systemic continuous improvement planning process
* Review ACLS monthly mailings and participate in ACLS webinars
* Conduct classroom observations and give timely feedback
* Provide common planning time to instructional staff
* Monitor program curriculum and revise as needed
* Monitor and support staff PD goals and activities, particularly as they relate to program goals
* Monitor fiscal status (e.g., spending by line item) (Note: See [*Grants for Schools: Getting Them and Using Them, A Procedural Manual*](http://www.doe.mass.edu/grants/procedure/manual.html)for guidance.)
* Monitor student outcomes, particularly post-tests and follow-up □ (Note: Follow-up reports are generated quarterly but it is recommended programs do follow-up work at least monthly.)
* Ensure timely and accurate data entry
* Ensure advising is available to students
* Stay current with monthly requests for funds
* *Enter specific enrollment, assessment, post-exit outcomes, and drawdowns and expenditures into a desk review workbook as per annual submission schedule issued by ACLS*
 |
| **July** | * Update staff and student handbooks as needed
* Update job descriptions as needed
* Recruit for open positions as needed
* *Complete data entry for previous year*
 |
| **August** | * Begin orientation for new staff
 |
| **September** | * *Begin pre-testing students in BEST Plus 2.0, MAPT, TABE 11/12, CLAS-E*
* Ensure staff have PD plans 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 PD providers
* Review emergency evacuation plan and emergency procedures with staff and students
 |
| **October** | * *Review state-assigned Measurable Skills Gain (MSG) target*
 |
| **November** | * Celebrate Massachusetts Family Literacy Month
 |
| **December** | * *Submit waitlist verification (Note: This is an annual requirement verified with the DQC.)*
 |
| **January** | * Conduct formal classroom observations (at a minimum annually)
* Conduct mid-year post assessment (optional)
* Review financial expenditures by line item and decrease budget if funds will not be expended
 |
| **February** | * *Submit assessment recertifications for Best Plus 2.0*
* Submit budget amendment if needed
 |
| **March** | * Begin planning for continuation funding, changes in program design
* *Submit assessment recertifications for CLAS-E Writing*
 |
| **April** | * Develop schedule for post-testing and begin post-testing students
 |
| **May** | * Attend Directors’ Meeting
 |
| **June** | * *Complete continuation budgets for approval*
* *Submit all required end of year reporting*
* Conduct end of year program and staff evaluations
* *Ensure all students have been post-tested by 6/30*
* Celebrate student, staff, and program successes
 |
| * ACLS encourages programs to establish procedures that ensure: 1) follow-up reports are reviewed regularly; 2) students are informed that programs will be contacting them post-exit; 3) staff time is strategically scheduled to contact students; and 4) multiple follow-up strategies are used (e.g., phone, email, social media).
 |

## **Appendix E: Hierarchy of Applicable Regulations**

Grantees should become familiar with applicable federal regulations as they provide the universe of fiscal requirements for AE grants and will be used as reference during fiscal monitoring reviews. There are a number of requirements that come from different sources. The following section summarizes the hierarchy of legal requirements for federal AE programs that also apply to DESE state grants.

#### **Statutes**

Programmatic statutestypically contain rules that govern specific federal education programs. The programmatic statute for adult education isthe Adult Education and Family Literacy Act (AEFLA), Title II of the [Workforce Innovation and Opportunity Act](https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf). AEFLA is the statute (i.e., legislation) that authorizes AE grants. It contains information about the program goals and objectives, permissible use of funds, fiscal requirements, and other rules unique to the program.

Administrative statutes typically establish cross-cutting rules that apply to the management of federal education programs. An example is the General Education Provisions Act (GEPA), which defines rules regarding the timing and availability of certain education grants, appeal rights, enforcement actions, and other important administrative issues.

Appropriation statutesdetermine the specific amount of money that will fund the AE programs and may contain substantive requirements beyond simple funding, including additional programmatic or administrative requirements.

#### **Regulations**

Regulations are next in the legal hierarchy governing AE programs. Unlike statutes which are passed by Congress, regulations are drafted and adopted by the federal agency that is responsible for implementing the statute. A statute must be in place for an agency to adopt a regulation. (Note: The grant regulations specified in these documents also apply to state matching funds.)

The U.S. Department of Education (US ED) is responsible for maintaining specific programmatic and administrative regulations for US ED grants. These regulations can be found in the Code of Federal Regulations (CFR). CFR is the codification of the rules published in the Federal Register by the federal government. The first two numbers indicate the federal agency. Regulations pertaining to US ED are identified by the numbers 34. Therefore, 34 CFR regulations are specific to US ED grants. (Note: State AE grants meet the Commonwealth’s requirement to match federal funding. As a result, these grants must adhere to the same regulations as federal awards.)

Like statutes, there are programmatic and administrative regulations. In addition to agency specific regulations, there are general administrative regulations that address administrative requirements to all federal grants. The general administrative regulations have been adopted by all federal agencies and are to be adhered to along with the agency specific regulations. They address areas not specifically addressed in the agency regulations and our uniform requirements for all grants and are to be referred to if a requirement is not addressed in the agency specific regulations.

Programmatic regulations typically contain rules that govern specific federal education grants. The programmatic regulation for adult education, [34 CFR Part 463](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=bd74a6782834f6b8567d23a1628a2139&mc=true&n=sp34.3.463.d&r=SUBPART&ty=HTML), establishes specific programmatic and fiscal regulations to AE programs authorized under AEFLA.

US ED administrative regulations that are specific to the US ED grants awarded by DESE can be found in [34 CFR Part 76](https://www.ecfr.gov/cgi-bin/text-idx?SID=393301a7cdccca1ea71f18aae51824e7&node=34:1.1.1.1.23&rgn=div5), Administrative Requirements for State Administered Programs. These regulations provide grant administrative requirements for all US ED federal education grants administered by DESE. The grant regulations specified in these documents also apply to state matching funds.

Uniform Grant Guidance (UGG), [2 CFR Part 200](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl), are the Uniform Administrative Requirements, Cost Principles, and Audit Requirements are the general administrative, cost principles, and audit requirements for all federal grants. As indicated above, these regulations are the general administrative requirements for all federal grants and are to be referred to and followed if the requirement is not addressed in the 34 CFR regulations.

#### **Non-regulatory Guidance and Policy Letters**

These provide US ED’s interpretations of statutes and regulations in plain language with user friendly guidance to grant recipients and useful indicators about how US ED interprets important aspects of their federal programs. The guidance and policy letters do not have the same legal authority as the statutes and regulations.

## **Appendix F: Subawards**

Subawards generally include 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 pass - through agency (DESE) may subaward grant funds. However, in special circumstances DESE may approve the grantee to subaward grant funds. The U.S. Department of Education’s 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. The expenditures of the subaward will not be allowed if the subaward has not been approved by DESE.

When a grantee contracts for services and goods,the contract must be approved by DESE in the grant budget application process whether it is a contract or subaward. According to [2 CFR Part 200.330](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1330&rgn=div8), DESE must make a determination whether the contract casts the party receiving the funds in the role of a subrecipient or a contractor. The characteristics of a subrecipient include when the contractor:

* Determines who is eligible to receive the federal assistance;
* Has its performance measured in relation to whether objectives of a federal program were met;
* Has the responsibility for programmatic decision making;
* Is responsible for adherence to applicable federal program requirements specified in the federal award; and
* In accordance with its agreement, uses the federal funds to carry out a program for public purpose specified in authorized statute, as opposed to providing goods and services for the benefit of the grantee.

If any of these characteristics can be answered with yes, the contract is a subaward/subcontract.

A contract is for the purpose of obtaining goods and services for the grantee’s own use and creates a procurement relationship with the contractor. Characteristics of a procurement relationship are when the contractor:

* Provides the goods and services within normal business operations;
* Provides similar goods or services to many different purchasers;
* Normally operates in a competitive environment;
* Provides goods or services that are ancillary to the operation of the federal program; and
* Is not subject to compliance requirements of the federal program as a result of the agreement, though similar requirements may apply for other reasons.

Indirect costs can be negotiated based on the availability of funds.

The grantee’s determination of whether the contract meets the definition of a sub awardee or contractor must be documented and reviewed by DESE for approval. If the subcontractor is deemed a sub awardee, the subcontractor must be able to account for the expenditure of all grant funds and must abide by the same state and federal regulations. The grantee is required to use the same DESE grant budget form for all subcontracts/subawards and monitor the subcontractor for compliance. The recipient of the subaward/subcontract must also have an approved indirect cost rate from a federal cognizant agency or negotiate a rate with DESE. The indirect cost rate will be restricted to a maximum rate of 8% unless the grant restricts the recovery of indirect costs through statute.

Whether a contract or subaward, the grantee is expected to monitor the services provided. The grantee is expected to document the procedures for monitoring subawards/subcontracts and provide proof that monitoring was performed when requested by DESE.

For all contracts/subawards over $25,000, the grantee is expected to obtain a certification from the subcontractor that they are not on the Federal Debarment and Suspension List. The monitoring by the grantee to ensure the services were provided must be documented and provided to DESE upon request. A subcontractor determined to be a sub awardee must also abide by the same records retention requirements as the grantee and is subject to a DESE monitoring review. Such records include but are not limited to: fiscal records, Board records, and student records.

## **Appendix G: Budget Information Line by Line**

* Line 1: Administrators: Administrators supervise program staff and/or direct the program. Their duties include planning and management in program design, leadership, operations, human resources, budgeting, collaborations, and risk management. Regarding program supervision, all supervisory activities, including but not limited to classroom observations, curriculum development, and supervising teaching, curriculum development, and lesson planning are considered administrative. These guidelines apply regardless of the title of the position.
* Line 2: Direct Service Staff: Direct service staff provide direct educational/instructional services under the project including curriculum development and similar activities when carried out by professional staff. For example, student tutoring hours provided by support staff would go on Line 2. Also, substitute teachers can go on line 2 or line 6 depending on how they are paid. If there is no withholding, their hours go on line 6. If they are paid within the payroll system with deductions for withholding, their hours go on line 2.
* Line 3: Support Staff: Support staff provide services necessary to support direct educational/instructional services under the project. Costs included under this line item must be directly attributable to the project and documented. This would include administrative assistants that perform duties directly related to the program (e.g., data input, IT technicians) and support directly related to the program.
* Line 4: Fringe Benefits: Fringe benefits offered to project staff must be granted under approved plans and be consistent with the grantee's standards for similar costs supported with other than project funds. For example, funds may be allocated for retirement accounts if, and only if, such benefits are provided to other staff working at the applicant agency. (Note: Fringe for staff charged to Lines 1 and 3 staff contributes to programs’ overall administrative costs.)
* Line 5: Stipends: Stipends, in general, are not charged to AE grants. However, staff that receive a stipend for grant activities, which are over and above their regular responsibilities, may only receive the stipend if the grantee has a policy of paying overtime for such activities. Stipends paid must have supporting documentation that describes the purpose of the payment and provides evidence of performance.

Line 6: Contractual: Costs must be supported with a scope of services and evidence that services were rendered through time sheets, attendance records, and the DESE budget for subcontracts/subawards. Contracts over $25,000 should have a certification from the subcontractor/sub awardee that they are not on the federal debarment and suspension list. Also, substitute teachers can go on line 2 or line 6 depending on how they are paid. If there is no withholding, their hours go on line 6. If they are paid within the payroll system with deductions for withholding, their hours go on line 2.

* Line 7: Materials and Supplies including Computing Devices: As per [2 CFR Part 200.302(b)(4)](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1), [2 CFR Part 200.314](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1), and [2 CFR Part 200.453](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1), costs for materials and supplies necessary to carry out a federal award are allowable. Materials and supplies[[40]](#footnote-41) refer to all tangible property other than that described in the Equipment section below. Incoming transportation charges are a proper part of materials and supplies costs. Purchased materials and supplies must be charged at their actual prices. Grantees must maintain effective control and safeguard all assetsincluding technologyand assure that they are used solely for authorized purposes regardless of cost.

Property records for computing devices and equipment must be maintained. Records must include a description of the property, a serial number or other identification number, the source of funding for the property, who holds title, the acquisition date and cost of the property, percentage of federal participation in the costs for the federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and, if applicable, sale price. Grantees are required to have a written inventory policy that includes technology.

As per [2 CFR Part 200.313](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1313&rgn=div8), programs that have usable equipment and/or computing devices purchased with grant funding, which will no longer be used on behalf of an DESE-funded program, must notify their ACLS PS so the PS can facilitate the reallocation of the usable equipment and/or computing devices to programs in the region. Programs that wish to follow a different procedure for disposal of computing devices and equipment should submit a written request to the state director. (Note: Date of disposal and sale price, including the method used to determine fair market value, if applicable, must be added to the equipment inventory.)

* Line 8: Travel: Costs for employees on official business incident to the project. AEFLA Sec. 233 states that professional development (PD) expenses are administrative expenses. DESE further defines administrative PD expenses to include non-SABES/MCAE registration fees and travel expenses, including out of state travel but SABES/MCAE training of direct service staff as instructional expenses. Costs must be consistent with the grantee’s standards for similar activities supported with other funds. Out of state travel must be approved by DESE and travel reimbursements must be reasonable, allowable, and related to grant activities.
* Line 9: Other: This line includes the allocable costs related to a Single Audit for grantees that expended an aggregate amount of federal funds of $750,000 or greater for the fiscal year. In addition, classroom space costs required to meet the additional needs of the grant that were not included in the grantee’s proposal (e.g., a satellite space at a request by DESE to provide additional services).
* Line 10: [Indirect Costs](http://www.doe.mass.edu/grants/essential.html) (IDC): The AE services program is a restricted rate program that is subject to a statutory supplement not supplant restriction. As per [2 CRF Part 200.56](https://www.ecfr.gov/cgi-bin/text-idx?SID=d0fd5d854a5a34225e4e558656655b66&mc=true&node=se2.1.200_156&rgn=div8) and [34 CFR Part 76.563-569](https://www.ecfr.gov/cgi-bin/text-idx?SID=393301a7cdccca1ea71f18aae51824e7&node=34:1.1.1.1.23&rgn=div5)[[41]](#footnote-42), grantees are allowed a restricted IDC rate of eight (8) percent, unless their calculated restricted IDC rates are less than 8%, in which case they must use the lower rate. If a grantee has an approved negotiated federal IDC rate, it must be submitted to DESE. If a grantee does not have an approved IDC rate, the grantee must negotiate a restricted indirect cost rate with DESE. The IDC rate is calculated using costs specified in the grantee's IDC plan. The grantee must provide documentation to support the costs related to general administration. Other costs are the executive director and department heads that do not have organization wide duties. The costs included in the indirect cost rate proposal cannot be charged as direct costs on other federal or nonfederal programs and must be allowable costs under the cost principles of [2 CFR Part 200 Subpart E](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1.5&rgn=div6).

Grantees must annually apply to DESE Audit & Compliance Unit for an approved IDC rate prior to submission of grant applications. Grantees that do not have an approved IDC rate will not be able to claim indirect costs.

When the direct grantee and a subcontractor both have approved DESE IDC rates, both agencies may charge indirect costs to the grant. However, the total dollar amount charged for indirect costs must not exceed the maximum IDC dollar amount for which the direct grantee is eligible.

When the direct grantee has an approved IDC rate, but the sub awardee/subcontractor does not have an approved IDC from a federal cognizant agency or DESE, the sub awardee/subcontractor may not charge an IDC rate. If the sub awardee/subcontractor has a federal negotiated rate agreement it must be sent to DESE Audit & Compliance for review and approval. Upon approval, the sub awardee/subcontractor may charge the approved IDC rate allowed which will be limited to a maximum of 8% as long as the dollar amount of the total indirect charged to the grant does not exceed the maximum dollar amount for which the direct grantee is eligible.

When a subcontractor has an approved IDC rate, but the direct grantee does not, the subcontractor may claim an IDC. Subcontractors are bound by the maximum amount the direct grantee can charge under the grantee’s approved indirect rate.

* Line 11: Equipment: As per [2 CFR Parts 200.33, 200.313, 200.453, and 200.439](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1), equipment is tangible, nonexpendable, property having a useful life of more than one year and an acquisition cost of $5,000 or more per unit. Equipment must be used in the program for which it was acquired. Grantees must not encumber the property without prior approval from DESE.

During the time that equipment is used in the program for which it was acquired, grantees must also make equipment available for use on other programs currently or previously supported by the federal government, provided that such use will not interfere with the work on the program for which it was originally acquired. First preference must be given to other programs supported by the federal awarding agency that financed the equipment and second preference must be given to programs under federal awards from other federal awarding agencies. Use for non-federally-funded programs and projects is also permissible. User fees should be considered if appropriate. (Note: The most common use of AE funds for equipment is for training equipment used in the implementation of MassSTEP ABE and Mass STEP ESOL grants.)

1. Diversity: The representation of people from a wide range of races, languages, abilities, identities, experiences, values, and perspectives. And we recognize the impact of intersectionality. [↑](#footnote-ref-2)
2. Equity: Placing a heightened focus on groups experiencing disproportionate impact through the development of systems to remediate disparities in their experiences and outcomes, particularly racial groups. [↑](#footnote-ref-3)
3. Inclusion: Pursuing deliberate actions to create welcoming environments and ensure differences are actively sought and heard, and that every individual feels a sense of belonging and a role in impacting decision-making, practices, and policies. [↑](#footnote-ref-4)
4. Programs that propose a schedule not aligned with the traditional September to June academic calendar must provide a rationale for the proposed schedule. [↑](#footnote-ref-5)
5. [*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-6)
6. 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-7)
7. Programs do not have to create classes based on EFL. They can structure classes flexibly to serve students with similar instructional needs. [↑](#footnote-ref-8)
8. Outcome measures are based on educational functioning level (EFL) completions. For more information on EFL completions, see the Student Progress chapter. [↑](#footnote-ref-9)
9. ACLS requires that programs providing preparation for the Spanish HSE ensure that students receive instruction in English language acquisition. This will help students both 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. [↑](#footnote-ref-10)
10. Instruction in Spanish leading to an HSE credential can count toward a program’s ABE target. Instruction in languages other than English with the purpose of leading to English language acquisition counts toward a program’s ESOL target. For more information on program targets, see the Student Progress chapter. [↑](#footnote-ref-11)
11. Classroom practices and sequences of lessons designed to foster the growth mindset are required in any curriculum aligned to the [*College and Career Readiness Standards for Adult Education*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf). Additionally, the qualities and habits of mind of the growth mindset are vital for success in the college classroom and in the workplace. [↑](#footnote-ref-12)
12. Students who are preparing for the Spanish High School Equivalency (HSE) credential are pre- and post-tested using ESOL tests and therefore not automatically considered eligible for the secondary school diploma performance indicator. In order for any HSE outcomes to be captured, programs must indicate that the Spanish content and instruction is at the 9th grade level or above in [LACES](https://laces.literacypro.com/laces/) by checking the “Instruction at the 9th Grade Level or Above” box in the Class Data tab for existing classes or in the Class Intake for new classes. [↑](#footnote-ref-13)
13. Workforce preparation activities are 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. [↑](#footnote-ref-14)
14. As defined in WIOA, The term ‘‘family literacy activities’’ means activities that are of sufficient intensity and quality to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children’s learning needs, and that integrate all of the following activities: (A) Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency. (B) Interactive literacy activities between parents or family members and their children. (C) Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children. (D) An age-appropriate education to prepare children for success in school and life experiences. [↑](#footnote-ref-15)
15. Parents are defined as primary caregivers. These may include extended family members or other adults who either reside with the child or play a primary role in the child’s life. [↑](#footnote-ref-16)
16. The terms distance education and distance learning are often used synonymously. [↑](#footnote-ref-17)
17. [NRS Technical Assistance (TA) Guide](https://nrsweb.org/policy-data/nrs-ta-guide), updated March 2021. [↑](#footnote-ref-18)
18. Literacy Volunteers of Massachusetts (LVM) provides adult education 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-19)
19. The program must do follow-up when the student does not provide an SSN. [↑](#footnote-ref-20)
20. Adapted from [*The Glossary of Education Reform*](http://edglossary.org/curriculum/). [↑](#footnote-ref-21)
21. Adapted from Testing, Teaching, and Learning: A Guide for States and School Districts, National Research Council (1999), p. 20. [↑](#footnote-ref-22)
22. “Leading economists who have examined labor market projections note that key college and career ready knowledge and skills are closely linked to being able to get the training necessary to earn a living wage in high-growth industries. It is crucial, then, that adult education programs provide students the opportunity to acquire these skills to pursue their long-term career aspirations and goals.” Pimentel (2013). [*College and Career Readiness Standards for Adult Education*](http://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf), page 2. [↑](#footnote-ref-23)
23. The [*MA ELPS*](http://www.doe.mass.edu/acls/frameworks/frameworks.html) integrate standards from the[*Massachusetts ABE Curriculum Framework for English for Speakers of Other Languages*](http://www.doe.mass.edu/acls/frameworks/archive.html) (2005), the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf), and the [*Massachusetts English Language Proficiency Standards for Adult Education*](http://www.doe.mass.edu/acls/frameworks/frameworks.html) (2016). [↑](#footnote-ref-24)
24. [SABES](http://www.sabes.org/) offers extensive PD for curriculum development and in how to implement the [*CCRSAE*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf). Programs opting to submit draft curriculum materials to the SABES ELA, mathematics, and ESOL Curriculum and Instruction PD Centers will receive feedback to inform future work. Programs are advised to inform the relevant PD centers that they plan to submit and what materials they will be submitting to facilitate planning and timely feedback. For contact information, see the [SABES website](http://www.sabes.org). [↑](#footnote-ref-25)
25. STAR students attest to the value of STAR, saying:

*- “Before I started to do assessment testing, I never know how much vocabulary I knew... I think it is helpful to know a lot of vocabulary not just to pass the Hi-SET test. It's helpful to communicate with friends, especially at work.”*

*- “The best thing is how the teacher helps us, we are divided by group, and each group is helped in the most necessary way.”* [↑](#footnote-ref-26)
26. [Integrating Technology in WIOA](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/integrating-technology.pdf), Workforce Innovation and Opportunity Act, U.S. Department of Education, Office of Career, Technical, and Adult Education (2015) [↑](#footnote-ref-27)
27. For English learners receiving mathematics instruction. [↑](#footnote-ref-28)
28. For more on the instructional shifts for ELA, see Pimentel, Susan. 2013. [*College and Career Readiness Standards for Adult Education*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf), pages 9-10. [↑](#footnote-ref-29)
29. For more information on the instructional shifts for mathematics, see Pimentel, Susan. 2013. [*College and Career Readiness Standards for Adult Education*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf), pages 44-46. [↑](#footnote-ref-30)
30. For more information on the Standards for Mathematical Practice, see Pimentel, Susan. 2013. [*College and Career Readiness Standards for Adult Education*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf), pages 46, 48-50. [↑](#footnote-ref-31)
31. Adapted from [*The Glossary of Education Reform*](http://edglossary.org/curriculum/). [↑](#footnote-ref-32)
32. [Fact Sheet: Testing Action Plan](https://www.ed.gov/news/press-releases/fact-sheet-testing-action-plan), U.S. Department of Education (2015) [↑](#footnote-ref-33)
33. Adapted from [*The Glossary of Education Reform*](http://edglossary.org/curriculum/). [↑](#footnote-ref-34)
34. Adapted from [*The Glossary of Education Reform*](http://edglossary.org/curriculum/). [↑](#footnote-ref-35)
35. EFL completion may also be referred to as EFL progression or EFL gain. [↑](#footnote-ref-36)
36. DeSousa, D.J. (2005). *On course: Strategies for creating success in college and in life* (4th ed.). Boston: Houghton Mifflin Company [↑](#footnote-ref-37)
37. Light, R. (2001). *Making the most of college*. Cambridge, MA: Harvard University Press. [↑](#footnote-ref-38)
38. 22 is the maximum age limit to which free education must be offered. [↑](#footnote-ref-39)
39. The US ED 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-40)
40. Supplies include computing devices if the acquisition cost is less than $5,000, regardless of the length of their useful life. Computing devices means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories or peripherals for printing, transmitting and receiving, or storing electronic information. [↑](#footnote-ref-41)
41. As per [34 CFR 76.563-569](https://www.ecfr.gov/cgi-bin/text-idx?SID=393301a7cdccca1ea71f18aae51824e7&node=34:1.1.1.1.23&rgn=div5), the restricted rate is much lower than the unrestricted indirect cost rate which must be calculated to attain the restricted rate. Certain indirect costs allowed in the unrestricted rate determination are not allowed in the restricted rate. These costs include but are not limited to, rent and maintenance costs for space other than the space occupied by the general administration staff such as the accounting, procurement, and human resources office which are organizational wide costs. [↑](#footnote-ref-42)