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LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM

TO:

Dr. Monty Sullivan LCTCS President

THROUGH:

Dr. René Cintrón

Chief Education and Training Officer

FROM:

Erin Landry

Executive Director of WorkReady U

SUBJECT: Por Review and Advisement: Amendments to LCTCS WorkReady U Policies #1.101, #1.102, #1.103, #1.110, #1.111, #1.113, #1.114, #1.116, #1.117 and the deletion of #1.112.

DATE:

November 21, 2019

FOR APPROVAL:

Recommendation: Staff recommends that the Board accept for approval LCTCS WorkReady U Policies #1.101, #1.102, #1.103, #1.110, #1.111, #1.113, #1.114, #1.116, #1.117 and the deletion of #1.112.

Background: Act 732 of the 2010 Regular Legislative Session transferred, from LDOE to LCTCS, responsibility for the establishment, operation and maintenance of a statewide program of adult education. Act 732 further provided that each program of adult education shall be subject to the overall administration and supervision of the LCTCS Board of Supervisors. Finally, Act 732 further authorized the LCTCS Board of Supervisors to adopt such rules and regulations as are necessary for the operations and maintenance of effective adult education programs. The LCTCS Board of Supervisors adopted multiple policies in 2011 regarding the administration of the adult education program. However, since that time, additional testing providers have entered the market and the Workforce Innovation & Opportunity Act of 2014 (WIOA) was signed into law to reauthorize the Workforce Investment of Act of 1998 (WIA) for Title II Adult Education and Literacy. To ensure that LCTCS fulfills its responsibility, which includes the alignment of the adult education policies to WIOA Title II requirements, updating of the aforementioned policies ensures that all policies reflect the current landscape of adult education.

History of Prior Actions: All policies were initially adopted on 2/09/2011. Policy #1.101, #1.103, #1.111, #1.116 were updated 11/14/2012 and #1.117 was updated on 11/13/2013.

Fiscal Impact: N/A

Benefits to the System: The updating of the aforementioned policies will allow LCTCS to ensure that its policies accurately reflect the current landscape of adult education and High School Equivalency testing within the State of Louisiana.

Approved for Recommendation to the Board

Dr. Monty Sullivan

12-11-19

Date

Title: Introduction WorkReady U - Adult Education Administration

Authority: Board Action

Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: November 14, 2012

A. The purpose of Adult Education in Louisiana under the Workforce Innovation & Opportunity Act (WIOA) is to enable local adult education providers, as core partners of Louisiana's workforce system, to develop, implement and improve adult education and literacy services throughout the state to further the vision and goals as outlined in the WIOA State Plan for the State of Louisiana, and WIOA, in order to:

- Assist adults to become literate and obtain the knowledge and skills needed for employment and economic self-sufficiency
- Assist adults who are parents or family members to obtain the education and skills needed to participate successfully in the educational development of their children and improve the economic opportunities of the family
- Assist adults in the attainment of a high school equivalency diploma and in the transition to postsecondary education and training through career pathways
- Assist immigrants and other individuals who are English language learners in improving their reading, writing, speaking and comprehension skills in English; improving their math skills; and acquiring an understanding of the American System of Government, individual freedom, and the responsibilities of citizenship.
- B. Institutions of higher education, specifically Eligible providers of adult education, are required by law, the Workforce Investment Act (WIA) Workforce Innovation and Opportunity Act (WIOA), and by state-imposed regulations, the National Reporting System (NRS), to make sure that the initial and on-going assessment of adult learners is valid, reliable, and comparable on national and state levels.
- B. The Adult Education Data Quality and Procedures Manual WorkReadyU policies and the Assessment Policy Supplement assists local adult education programs in meeting the reporting requirements of the National Reporting System (NRS) for Adult Education. The policies are designed to:
 - 1. assist local adult education programs with the processes of gathering student data;
 - 2. inputting data into the state approved adult education database system;
 - 3. reporting data on program performance; and
 - 4. reviewing data to plan for and facilitate program improvement.

- C. The policy is applicable to all funded eligible providers through the Workforce Innovation and Opportunity Act of 2014: Title II; the Adult Education and Family Literacy Act (AEFLA) and State Adult Education funds local adult and family literacy programs which are funded through the Louisiana Community and Technical College System. Providers and is shall be in compliance with NRS requirements, which is the official accountability system for federally funded adult education programs. NRS reporting components include:
 - 1. student assessment measures;
 - 2. data collection methodologies;
 - 3. reporting forms; and
 - 4. program procedures.
- D. It is critical that all programs adhere to the <u>federal and state</u> policies and procedures outlined in this manual to ensure uniform implementation and comparability across programs. Therefore, LCTCS will provide targeted technical assistance and training activities to promote compliance with applicable testing policies and procedures, as well as federal and state accountability reporting.
- E. The Louisiana Community and Technical College System and the National Reporting System for Adult Education are committed to assisting local adult education programs in improving the quality and utility of program data. Questions regarding the policy should be directed to the Louisiana Community and Technical College System.
- F. The Louisiana Community and Technical College System reserves the right to include more restrictive and/or additional requirements to federal rules in order to align policies and procedures with other programmatic divisions within LCTCS. State requirements will be denoted as such.

Title: Standardized Assessments

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: Initial

A. National Reporting System (NRS) policies require local adult education programs to assess and place students at an educational functioning level (EFL) upon intake and at least one other time during the program year. Standardized assessments used to place students or demonstrate educational growth must be both valid and normed for adult students. The initial assessments are to be administrated at intake or the first 12 hours of attendance.

- B. Each local director is responsible for training instructors, paraprofessionals, and volunteers in the proper procedures for administering NRS approved assessments. All staff members involved in gathering, analyzing, compiling, and reporting NRS data shall participate in professional development training as specified in the State Plan. Section 12.1. The state also provides opportunities throughout the year for instructors to become certified in the administration of the approved assessments. The training is administered by the local program supervisor or director and sessions are scheduled annually plus on an as needed basis for new personnel.
- C. In order to provide professional development opportunities for all local providers, the state staff will conduct three regional meetings and one state conference annually. These conferences include seminars and workshops on assessment policies and procedures, accommodations for assessing students with disabilities, NRS policy, data collection procedures, definitions of measures, and specific training for conducting assessments used in the program.

Title: Approved Assessments

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: November 14, 2012

A. The Louisiana Community and Technical College System (LCTCS) approves certain assessments which are aligned with the educational functioning levels within the National Reporting System (NRS) to measure student level and growth. Only assessments on this list may be used to determine student placement upon intake or demonstrate educational growth. No other assessments, other than the assessments listed on the placement chart found in the NRS Guidelines, are to be used by local programs for placement purposes or to demonstrate educational growth at an educational functioning level.

- B. Assessments for Adult Basic Education and Adult Secondary Students:
 - 1. Test of Adult Basic Education (TABE);
 - 2. Comprehensive Adult Student Assessment System (CASAS);
 - Wonderlie General Assessment of Instructional Needs (GAIN); (to be used at the Low Intermediate Basic Education, High Intermediate Basic Education and Low Adult Secondary education functioning levels only)
 - WorkKeys (may be used only at the High Intermediate Basic Education and Adult Secondary Education Educational Functioning Level).
- C. Assessments for English-as-a-Second Language Students:
 - 1. Basic English Skills Test (BEST) Literacy and BEST Plus 2.0;
 - 2. Comprehensive Adult Student Assessment System (CASAS);
 - 3. Test for Adult Basic Education—Complete Language Assessment System—English (TABE CLAS-E).

Title: Data Matching

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: Initial

A. The state of Louisiana uses data matching as the methodology to follow up on the National Reporting System (NRS) core measures primary indicators of performance. The Social Security Number (SSN) of the learner will be used to match data with Louisiana Workforce Commission (LWC) employment records, the National Student Clearinghouse post-secondary enrollment and for other federal or state required reports. records used by the LWC.

- B. The SSN of the individual student is used by the Louisiana Community and Technical College System (LCTCS) only to search records. and is not released by LCTCS to any other third party individual or agency. The resulting data is reported in aggregate format without any individual identifiable information. Accurate Social Security Numbers are critical to the success of the data matching process. Local programs are responsible for checking enrollment forms for missing or invalid SSNs and are prohibited from "making up" a SSN for a student. If a student fails to provide his/her SSN, local programs should follow up with the student to obtain the SSN. A student may refuse to provide his/her SSN to a local program; however, local program personnel will explain how this information is used and its importance in demonstrating program performance.
- C. Upon completion of the data-matching process, LWC provides the LCTCS with a list of students who achieved the specified outcomes and these outcomes are reported back to local programs. The data matching process specifically tracks those students who set employment as a goal for the Primary Indicators of Performance as outlined in WIOA, but also matches all students in the database for the core measures. This process programs to know which students met their specified goal(s) and those who have achieved other outcomes while enrolled in the program. These outcomes are to be entered as an achievement in the approved adult education database, not as a goal allows

Title: Data Accuracy and Entry

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: November 14, 2012

A. The following data must be entered by local programs in order to ensure that the National Reporting System (NRS) provides valid and accurate data. Data entry errors, which go uncorrected, often do not reflect the progress of the student or the program, and often affect funding for local programs. Timely review of data assists in ensuring its accuracy and adherence to programmatic guidelines. The following represents Louisiana Community and Technical College System adult education data collection and entry policies as well as common data entry errors.

*Program staff collects NRS demographic information directly from participant, upon entry into the program. Participants self-report these measures or staff may determine demographic measures through observation, when participants decline to self-identify.

Data	Entry Guidelines	
Social Security Number or	1. Enter the learner's real Social Security number.	
Identifying Number	2. Enter the alien identification number if ESI	
	students do not have a Social Security number.	
Age	Enter the student's date of birth (The minimum age at	
	time of entry is 16.)	
*Gender	Designate whether the participant is Male or Female	
Contact Information	1. Enter as many phone numbers that are available	
	for the student (e.g., home, work, etc.).	
	2. Enter a complete mailing address including a	
	number, street, apartment (if applicable), town and zip	
	code.	
	3. Use the learner's parish of residence (not where	
	the program is located).	

Data Data Data Data	Entry Guidelines
*Barriers to Employment	Indicate if the student is: 1. Displaced homemaker, 2. English language learner, low literacy level, cultural barriers 3. Exhausting Temporary Assistance for Needy Families (TANF) within 2 years 4. Ex-offender 5. Homeless or runaway youth 6. Long-term unemployed 7. Low Income 8.Migrant and seasonal farmworker 9. Individual with disabilities 10. Single Parent 11. Youth in foster care or who has aged out of the system
Highest Degree or Level of	From the drop down menu in the database choose the
School Completed	appropriate category and indicate if the schooling was US Based or Non US based.
Enrollment Status	1. Enter The learner's enrollment status: enrolled, is either active, or left inactive based upon enrollment and exit dates. 2. A learner shall be separated and his/her status changed to left after nonattendance for 90 days according to NRS policies.
Attendance	1. Attendance must be recorded collected daily on sign-in sheets or by using an electronic system approved by LCTCS. It is recommended that attendance be entered on a weekly basis. 2. Attendance hours are counted for instruction or instructional activities. Instructional activities include classroom instruction, assessment to inform instruction, tutoring or participation in a learning lab. Virtual, on-line or distance education attendance hours must be recorded following WRU policy & NRS guidelines.
Test Scores	Enter test results (pre-test or post-test) upon completion of approved assessment.
*Race/Ethnicity	Racial or ethnic category to which the learner self- identifies, appears to belong to, or is regarded in the community as belonging. When collecting data, program staff are to first ask about a student's ethnicity (i.e., Hispanic/Latino or not) and then select one or more races with which the student identifies. Programs report data by counting students in only one of the following seven aggregate racial/ethnic categories: American Indian or Alaskan Native, Asian, Black or African American, Hispanic/Latino of any race, Native Hawaiian or Other Pacific Islander, White and Two or more races.

Data	Entry Guidelines	
Labor Force Employment	Whether The learner's employment status is employed,	
Status	unemployed not employed, or not in the labor force	
	the time of entry into the adult education program, is	
	entered according to the following criteria: Employed,	
	Employed but Received Notice of Termination of	
	Employment or Military Separation is Pending,	
	Unemployed, or Not in the Labor Force.	

- B. The Louisiana Community and Technical College System requires that local programs submit a designation of distance learner for students enrolled in the adult education program, by participating in state-approved curricula (see chart below) and following a state-approved model for distance education.
 - 1. The student must be designated as a distance education learner if the majority of the student's attendance hours are in distance education utilizing only state-approved curricula. NRS approved proxy contact hours include:
 - a. Clock Time Model, which assigns contact hours based on the elapsed time that a learner is connected to, or engaged in an online or standalone software program. Student hours are taken from the activity statistics provided in the software.
 - b. Teacher Verification Model, which assigns a fixed number of hours of credit for each completed assignment based on teacher determination of the extent to which a learner engaged in, or completed, the assignment. Telephone call and email contact are allowable in this model; however a contact log containing the date of contact, student name, topic discussed, and length of contact. The contact log must be filed with student attendance records.
 - c. Learner Mastery Model, which assigns a fixed number of hours of credit based on the learner passing a test on the content of each lesson. Learners work with the curriculum and materials and when they feel they have mastered the material, take a test. A high percentage of correct answers (70 percent) earns the credit hours attached to the material.
 - 2. Students must have at least 12 onsite contact hours with the program.
 - 3. Pre-tests and post-tests are to be administered in person using the state assessment policy.
 - 4. Programs will report all required NRS data elements on distance education students in the state approved data management system.

Models for Determining Proxy Contact Hours (PCH) for Curricula Included in the Project IDEAL Distance Student Tracker

Curriculum	Model	Criteria for Awarding PCH	PCH-Credit
Crossroads Café*	Mastery	Passed unit test @ > 70%	10 hours per unit; total possible PCH = 260
English for All	Mastery	Passed unit test @ > 70%	6 hours per unit; total possible PCH = 120

GED Connection**	Teacher Verification	Video: student self-report; teacher validates whether	Video: .5 hrs.
		student viewed	Workbook: >75% of
		Workbook: teacher determines % of work completed	activities completed = 4 hrs; 50-74% = 2 hrs
		Internet Activities: teacher determines work completed	Internet Activities: 1 hr per activity; total possible PCH = 43
		Internet Module: teacher	
		validates w/questioning	Modules: 3 hrs per
		whether student has engaged	module; total possible PCH = 15
		Practice Tests: online and print	
		based	Tests: 1 hr. per; total possible PCH = 22
GED Illinois	Mastery	Passed unit test	50 minutes per unit
Madison	Teacher	Video: student self report;	Video: .5 hrs
Heights/Lifelines	Verification	teacher validates whether student viewed	
MHC GED	Clock	System must tract time and log	Recorded time in system
Integrated		out-student after preset period	
Online		of inactivity	,

^{*}Proxy contact hours could also be determined by the teacher verification model.

***Different states/agencies/developers have used different criteria to determine PCH to assign to a particular curriculum. Criteria should be reviewed carefully to determine whether they fit with your state's policy on assigning PCH.

Models for Determining Proxy Contact Hours (PCH) for Curricula Included in the Project IDEAL Distance Student Tracker

Curriculum	Model	Criteria for Awarding PCH	PCH Credit
PLATO	Clock	System must tract time and log out students after preset period of inactivity	Recorded time in system
Pre GED Connection	Teacher Verification	Video: student self-report; teacher validates whether student viewed	Video: .5 hrs

^{**}Proxy contact hours could also be determined by the mastery model.

Skills Tutor	Clock	System must tract time and log out students after preset period of inactivity	Recorded time in system
Workplace Essential Skills**	Teacher Verification	Video: student self-report; teacher validates whether student viewed	Video: .5 hrs
		Workbook: teacher determines % of work completed	Workbook: >75% of activities completed = 2 hrs; 50 74% = 1 hrs; total possible PCH = 48
		Internet Activities: teacher determines % of work completed	Internet Activities: >75% of activities completed = 2.5 hrs; 50-74% = 1.5 hrs; total possible PCH = 60
		Preview and Review Tests:-print based	Tests: 1 hr per; total PCH possible = 8

^{*}Proxy contact hours could also be determined by the teacher verification model.

C. The Louisiana Community and Technical College System reserves the right to include more restrictive and/or additional requirements to federal rules in order to align policies and procedures with other programmatic divisions within LCTCS. State requirements will be denoted as such.

^{**}Proxy contact hours could also be determined by the mastery model.

^{***}Different states/agencies/developers have used different criteria to determine PCH to assign to a particular curriculum. Criteria should be reviewed carefully to determine whether they fit with your state's policy on assigning PCH.

Title: State Approved Adult Education Data System

Authority: Board Action Original Adoption: February 9, 2011

Effective Date:

February 9, 2011

Last Revision: Initial

A. The Louisiana Community and Technical College System (LCTCS) mandates that adult education programs, which it funds, must use the state-approved Adult Education Data System. Local programs are responsible for covering the costs of implementing and maintaining the system with a portion of their local grant funds. Staff from the LCTCS and staff from the state approved adult education data management system are committed to improving data quality by providing professional development workshops each year. The program supervisor or director will ensure that all program staff involved in gathering, analyzing, compiling, and reporting data for NRS will attend, at a minimum, an annual in-service meeting addressing the following topics: NRS and accountability policies; data collection process; definitions of performance measures; conducting pre and post assessments; and using data for improvement. While the above information can serve as a refresher for returning staff each year, it must also be included as part of the required in-service for new staff throughout the year. Adult Education staff shall participate in professional development training as specified in the State Plan.: Section 12.1.

Title: Resolving Data Reporting and Analysis Problems and Deviations

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: Initial

A. The Louisiana Community and Technical College System (LCTCS) requires that student data at the local program level shall be entered by the 10th day of each month for the prior month. Local program directors are responsible for oversight of timely entry into the state-approved adult education data management system and ensuring data quality and accuracy.

B. Local Program Level:

Upon receipt of It is the responsibility of the local program supervisor or director to develop:

- the security process for the program that ensures that standardized assessments are secure and administered using standardized testing practices;
- the data collection method and ensure accuracte entry into a data management system;
- the security procedures for sharing student data within the adult education program and with partners;
- <u>a regular schedule to run the diagnostic features in the data management system to detect data problems and/or deviations; and</u>
- the procedure for how data will be used for program evaluation and decisions for continuous program improvement.

B. State Level:

Upon receipt of The data submitted by local programs will be continually reviewed by the Louisiana Community and Technical College System (LCTCS) staff reviews program data at least a minimum quarterly for errors. LCTCS staff shall run the diagnostic features of the state approved adult education data management system to search again for common and obvious data errors, such as invalid attendance dates, birthdates, and/or Social Security numbers. Staff further reviews data using other searches to determine if additional data analysis problems and deviations exist. LCTCS staff shall send a report to local program supervisors or directors detailing any data analysis problems or deviations. It is the responsibility of local program directors to correct any data analysis problems or deviations within two weeks of notification of such problems by LCTCS staff.

C. Local program supervisors or directors must sign the data extract each quarter upon acceptance of data by LCTCS staff. The signed program extract confirms that the local program supervisor or director states that the data is correct to the best of his/her knowledge, the local program has adhered to LCTCS data guidelines, and data has been reviewed for errors. The data reflected in the signed extract is used to determine subsequent year funding and serves as the record of program performance.

Title: Requirements for Students

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: November 14, 2012

A. Students must be 18 years of age or older to enroll in an adult education program.

- B. Based upon mandatory attendance laws and the Louisiana Department of Education, Board of Elementary and Secondary Education (BESE) policy, the parent, tutor, or other person responsible for the school attendance of a child who is under the age of 18 and who is enrolled in a public school or homeschool beyond his sixteenth birthday may request a waiver from the local superintendent for the child to exit school to enroll and attend an adult education program approved by the Board of Supervisors of the Louisiana Community and Technical College System (LCTCS).
 - In the case of a child with no parent, tutor, or other person responsible for his school attendance, the local school superintendent may act on behalf of the student in making such a request if one or more of the following hardships exist and if the following appropriate documentation is on file at the local school board office:
 - a. pregnant or actively parenting;
 - b. incarcerated or adjudicated;
 - c. institutionalized or living in a residential facility;
 - d. chronic physical or mental illness;
 - e. family and/or economic hardships.
 - i. Family and/or economic hardship is defined as a student who acts as a caregiver or must work to support the family due to a parent's death or illness, or needs to be removed from an existing home environment.
 - 2. The local school superintendent or his/her designee may approve the request without requesting action from the Louisiana Department of Education, Board of Elementary and Secondary Education (BESE). If the request to exit school to enroll in a LCTCS-approved adult education program is denied at the local level, a student may request the waiver from the Louisiana Department of Education, Board of Elementary and Secondary Education (BESE), with documentation of reason for denial at the local level. Students seeking to exit school to enroll in adult education, who are enrolled in a formal education setting other than a public K-12 institution or homeschool, may request a waiver from the school/institution they attend. Additional information can be found on the LCTCS website.

http://www.lctcs.edu/index.cfm?md=pagebuilder&tmp=home&nid=205&pnid=201&pid=280&fmid=0&catid=0&elid=0.

Title: High School Equivalency Guidelines Requirements for Taking the General Educational Development (GED) Test

Original Adoption: February 9, 2011 Authority: Board Action

Effective Date:

February 9, 2011

Last Revision:

November 13, 2013

A. Age Requirements

1. A student shall be 17 years of age or older in order to be authorized to be administered the GED High School Equivalency Test.

- 2. A married or emancipated individual may be permitted to take the GED High School Equivalency Test at 16 years of age and above.
- 3. A student who has attained the age of 16 and qualified to take the GED High School Equivalency Test may request an age waiver from the local school superintendent if one or more of the following hardships exist and if appropriate documentation is on file at the local school board office:
 - a. pregnant or actively parenting:
 - b. incarcerated or adjudicated;
 - c. institutionalized or living in a residential facility;
 - d. chronic physical or mental illness;
 - e. family and/or economic hardships.
 - i. Family and/or economic hardship is defined as a student who acts as a caregiver or must work to support the family due to a parent's death or illness, or needs to be removed from an existing home environment.
- 4. All other requests for age waivers, because of hardships not listed above must be approved by the Louisiana Community and Technical College (LCTCS) prior to the students' taking scheduling the GED High School Equivalency Test.
- 5. Individuals 15 years of age and below shall not be permitted to take the GED High School Equivalency Test under any circumstances.

B. Qualifying Requirements

- 1. Individuals 19 years of age or above do not have to qualify for the GED High School Equivalency Test by taking the State approved Official Half-Length GED High School Equivalency Practice Test.
- 2. Individuals between 17-18 years of age or 16 years of age with an approved age waiver may qualify for the GED High School Equivalency Test by taking the State-approved

- Official Half-Length GED Practice Test and scoring a minimum of 410 on each part, with an average score of 450 achieve qualifying scores as established by the State.
- 3. Qualifying scores on the Official Half-Length GED Practice Test shall be certified by State-approved adult education sites of instruction. Any state-approved adult education site of instruction may recommend an individual to take the GED High School Equivalency Test.
- 4. The GED High School Equivalency Test may not be administered to candidates who are enrolled in an accredited high school unless they are enrolled in a the PreGED/Skills Options/Connection Program (The Options Program).state-recognized K-12 Options Program.
- 5. The GED High School Equivalency Test may not be administered to candidates who have graduated from an accredited high school.

Delete this policy - The has been added to policy 1.114 as Data Reporting, Analysis and Deviations

Title: Quarterly Reporting

Original Adoption:	February 9, 2011
Directive Date.	rebruary 7, 2011
Last Revision:	Initial

A. The Louisiana Community and Technical College System (LCTCS) requires that local programs enter data at least monthly during a program year. City or parish supervisors or program directors are responsible for timely entry into the state approved adult education data management system of local program data and ensuring its accuracy. LCTCS staff will review data for errors and contact supervisors or program directors to discuss needed corrections to local program data at least quarterly. Local program data for the prior month should be entered by the tenth day of each month.