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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:

Dr. Adrienne Fontenot

Director of Adult Learning and Educational Programs

DATE:

September 28, 2020

**SUBJECT:** 

For Board Review and Advisement: Revisions to LCTCS WorkReady

**U** Policies

### **FOR BOARD ACTION:**

**Recommendation:** Staff recommends the Board accept for review and advisement the attached revisions to LCTCS WorkReady U policies.

**Background:** LCTCS staff, along with WRU supervisors from various agencies, took part in a comprehensive review of all WorkReady U policies. The proposed changes include streamlining from 19 to 6 policies. The policy work group suggested combining similar policies and retiring outdated or repetitive policies. The WRU functional team voted in favor of moving forward with the proposed changes and sent the items for review to the August PACC meeting where they were approved.

Fiscal Impact: N/A

**History of Prior Actions:** There is a history of updating policies on an as-needed basis. Since all policies will now have a 2020 review date, we are proposing a set, rotating review schedule of policies moving forward in addition to the as-needed reviews.

**Benefits to the System:** The updating of the policies will allow LCTCS to ensure that its policies accurately reflect the current landscape of adult education and high school equivalency testing in Louisiana.

Approved for Recommendation to the Board

Dr. Monty Sullivan

Date

Policy #	Policy # Old Title	Status	New Title	Comments
1.101	WorkReady U - Adult Eudcation Administration	Active	WorkReady U - Legislative Authority & Accountability	minor revisions; no additions
1.102	Standardized Assessments	Active	WorkReady U - Program Administration	Combination of former policies 1.115, 1.116, and 1.121 with addition of definitions for "eligible providers" and "allowable activities" from WIOA. Text from former policy 1.102 moved to the new 1.103 (Assessments)
1.103	Approved Assessments	Active	WorkReady U - Assessment	Combination of former policies 1.102, 1.103, 1.104, 1.105, and 1.106. Removal of language that belongs in the policy supplement/procedures manual.
1.104	Educational Functioning Level (EFL) Placement	Active	WorkReady U - Data	Combination of former policies 1.113, 1.108, 1.110, and 1.114. Removal of language that belongs in the policy supplement/procedures manual. Text from former policy 1.104 moved to the new 1.103 (Assessments)
1.105	Post-Test Assessment and Standard Guidelines	Active	WorkReady U - High School Equivalency	Combination of former policies 1.117, 1.118, 1.119, and 1.120. Removal of language that belongs in the policy supplement/procedures manual. Text from former policy 1.105 moved to the new 1.103 (Assessments)
1.106	Special Populations	Active	WorkReady U - Curriculum and Instruction	Combination of former policy (part B) 1.111 and a new section on approved WorkReady U - Curriculum instructional standards. Text from former policy 1.106 moved to the new 1.103 and Instruction (Assessments).
1.108	Core Measures Reporting Guidelines	Superseded		Combined into Policy 1.104 (Data)
1.110	Data Matching	Superseded		Combined into Policy 1.104 (Data)
1711	Data Accuracy and Entry	Superseded		Part A deleted; removal of language that belongs in the policy supplement/procedures manual. Part B moved to the new policy 1.106 Curriculum and Instruction.
1.113	State Approved Adult Education Data System	Superseded		Combined into Policy 1.104 (Data)
1.114	Data Reporting and Analysis	Superseded		Combined into Policy 1.104 (Data)
1.115	Program Administration Guidelines	Superseded		Combined with into Policy 1.102 (Program Administration)
1.116	Requirements for Students	Superseded		Combined with into Policy 1.102 (Program Administration)
1.117	High School Equivalency Guidelines	Superseded		Combined into Policy 1.105 (High School Equivalency)
1.118	High School Equivalency Attainment	Superseded		Combined into Policy 1,105 (High School Equivalency)
	1.118 Operating Procedures			N/A
1.119	High School Equivalency Retest Guidelines	Superseded		Combined into Policy 1.105 (High School Equivalency)
1.120	Issuance of High School Equivalency Diploma	Superseded		Combined into Policy 1.105 (High School Equivalency)
1.121	Adult Education and High School Equivalency Authority	Superseded		Combined with into Policy 1.102 (Program Administration)

Title: WorkReady U - Adult Education Administration Legislative Authority & Accountabilty

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011
Last Revision: December 11, 2019

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 WIOA and 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, and transition to postsecondary education
- 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. Eligible providers of adult education are required by law, the Workforce Innovation and Opportunity Act (WIOA), 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.

The 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** through the Louisiana Community and Technical College System. Providers 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 federal and state policies and procedures 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

#### **Federal Requirements**

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 within the first 12 hours of attendance.

- B. Each local director is responsible for training instructors, paraprofessionals, and volunteers taff members 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. 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 regional meetings and one state conference annually. These conferences include seminars and workshops on regular professional development on topics such as, but not limited to, 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.

{All sections of this policy will move to the new WRU policy 1.103 (Assessment)}

**Title: Approved Assessments** 

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011
Last Revision: November 14, 2012

### **Approved Assessments**

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 11/12);
  - 2. Comprehensive Adult Student Assessment System (CASAS);
- 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).

**(All sections of this policy will move to the new WRU policy 1.103 (Assessment))** 

Title: Placement in an Educational Functioning Level

**Authority**: Board Action **Original Adoption**: February 9, 2011 **Effective Date**: February 9, 2011

Last Revision: November 14, 2012

## **Placement in Educational Functioning Levels**

- A. Upon administration of an approved assessment, at intake or within the first 12 hours of attendance, local programs are to place students at an educational functioning level.

  When available, local programs should administer an appraisal or locator prior to the full assessment. The Test of Adult Basic Education (TABE) Locator test is administered prior to the full assessment. Charts provided by the National Reporting System (NRS), 

  Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act, shall be used for determining the appropriate Educational Functioning Level (EFL) for a student. The Educational Functioning Level chart can be found on the NRS website, https://www.nrsweb.org/training-ta/ta-tools/assessment#Tools&Tips (NRS Test Benchmarks for EFL).
- B. Growth Student Progression can only be shown through the administration of an approved pre-test and post-test, by receiving the state-approved high school equivalency (HSE) or by exiting Adult Education and enrolling in a post-secondary training program.
- C. Students who test out of range of an NRS Educational Functioning Level should be retested according to test publisher guidelines.
- C. Students who test into the NRS Educational Functioning Level of Advanced ESL (ESL 6), scores of 76—78, must be given another pre-test, as there is no exit criteria established by NRS for *BEST Literacy*. If this occurs, do the following:

<b>Administrative Action</b>	Pre-test Option #1	Pre-test Option #2	Pre-test Option #3
		Administer TABE	Administer CASAS
1. Do not enter into	1. Use an oral screening	11/12 Reading	Reading GOALS
statewide data system.	tool to determine if student	and/or Language.	
	has low oral skills.		CASAS Math GOALS Math
2. Record pre-test		TABE Math is not	is not required unless the
attempt in student	2. If so, administer BEST	required unless	student has a math
<del>permanent record.</del>	<del>Plus.</del>	student has a math	<del>improvement goal.</del>
		improvement goal.	

D. Students who pre- test into *BEST Plus* 2.0 exit criteria (ESL Completed Advanced ESL), (scores of 565 or higher), must be given another pre-test as ESL Completed Advanced ESL, is not an NRS Educational Functioning Level. If this occurs, do the following:

<b>Administrative Action</b>	Pre-test Option #1	Pre-test Option #2	Pre-test Option #3
		Administer TABE	Administer CASAS
1. Do not enter into	1. Use a literacy screening	11/12 Reading	Reading GOALS
statewide data system.	tool to determine if student	and/or Language.	
	has low literacy skills.		CASAS Math GOALS Math
2. Record pre-test	•	TABE Math is not	is not required unless the
attempt in student	2. If so, administer BEST	required unless	<del>student ĥas a math</del>
permanent record.	<del>Literacy.</del>	student has a math	<del>improvement goal.</del>
		improvement goal.	

**Sections A, B, and C of this policy will be added to the new WRU policy 1.103 (Assessment)** 

## Title: POST-TEST ASSESSMENTS

Authority: Board Action	Original Adoption: Effective Date: Last Revision:	02/09/2011 02/09/2011 06/12/2019

### **Post-Test Assessments**

National Reporting Systems (NRS) reporting policies state that programs use a different form of the same test for the follow-up (post-test) assessment for a student. Both the pre-test and post-test shall be administered and scored according to the test directions provided by the test publisher. \*Programs shall adhere to the Minimum Postpost-testing Guidelines guidelines listed below to determine educational gain and academic progress. Students who meet the minimum post-testing guidelines for each assessment must be post-tested. Additional post-tests must follow established post-testing guidelines. Assessments have an effective date of 180 calendar days (defined as weekdays, weekends, and holidays) from the test administration date.

Assessment	Minimum Post-testing Guidelines
BEST Literacy	60 hours of instruction
BEST Plus	60 hours of instruction
Comprehensive Adult Student Assessment System (CASAS)	40 hours of instruction
Test of Adult Basic Education (TABE) for ABE students	40 hours of instruction
Test of Adult Basic Education (TABE) for ASE students	30 hours of instruction <sup>+</sup>
Test for Adult Basic Education Complete Language	
Assessment System-English (TABE CLAS-E)	60 hours of instruction

\*Providers that offer coordinated/planned instructional sessions may administer the post-test assessment at the conclusion of each instructional session, in order to support the student cohort and transition to college and career readiness. Providers must submit basic skill instructional schedule and integrated career pathway course schedule to the WRU office through the statewide data-base.

Programs for Corrections Education and Other Institutionalized Individuals may post-test according to the recommended hours of instruction or after enrollment for 90 days in the instructional program.

Fifty percent (50%) of students who are federally reportable will have a pre and post-test assessment.

Students who meet the minimum post-testing guidelines for each assessment must be post-tested. Additional post-tests must follow established post-testing guidelines.

Assessments have an effective date of 180 calendar days (defined as weekdays, weekends, and holidays) from the test administration date.

## **Informal and Supplemental Assessment**

In addition to the approved standardized assessments, programs are encouraged to use a variety of informal assessments to guide instruction. The use of teacher-made tests, unit tests, portfolios, applied performance assessments, and learner observations can be used to monitor learning and guide instruction. However, programs may only use approved methods to report learner *gains* for the NRS.

{All sections of this policy will be added to the new WRU policy 1.103 (Assessment)}

## Title: <u>SPECIAL POPULATIONS</u>

Authority: Board Action	Original Adoption: Effective Date:	02/09/2011 02/09/2011
	Last Revision:	06/12/2019

Accommodations for adult learners, who self-disclose a disability documented by a qualified professional and are eligible for accommodations under the provisions of Section 504 of the Americans with Disabilities Act (ADA), may be granted appropriate testing accommodations. Adult Education programs must document that adult learners were given the opportunity to self-disclose any disability during the student orientation process.

Assessments for special populations are administered with appropriate accommodations as specified by the test publisher of the approved assessment.

#### **BEST Literacy**

Laws such as the Americans with Disabilities Act of 1990 and other related federal, state, and local laws were enacted to guarantee equal opportunity for individuals with disabilities, including those in educational programs. Programs administering BEST Literacy are responsible for providing accessible services and for making sure that requests for accommodation are considered and handled in a manner consistent with applicable laws and regulations.

Program and test administrators may provide or allow accommodation in test administration procedures or in the testing environment for individuals with disabilities, provided that the accommodation does not compromise the purpose of the test as a measure of reading and writing in English. Permissible accommodations related to test administration procedures include the use of eyeglasses or magnifying glasses, earplugs, color overlays, or rulers. Testing environment accommodations might include frequent breaks or individual administration.

It is not an appropriate accommodation for someone to read the test questions to an examinee with sight impairment, as BEST Literacy is a test of reading (BEST Literacy Test Manual 2008 pgs. 9-10).

Additional information for the BEST Literacy assessment is available at <a href="http://www.cal.org/aea/pdfs/Frequently-Asked-Questions-CAL-Adult-ESL-Assessments.pdf">http://www.cal.org/aea/pdfs/Frequently-Asked-Questions-CAL-Adult-ESL-Assessments.pdf</a>

# BEST Plus 2.0

Accommodations in test administration procedures for BEST Plus <u>2.0</u> include using hearing aids, but do not include allowing students to read prompts from the computer screen. As BEST Plus <u>2.0</u> is not a timed test, no accommodation for testing time is needed. Furthermore, as an oral proficiency interview, students need to hear test prompts and respond orally as well as look at picture cue prompts; therefore, no accommodation can be made for students who cannot hear, speak or see (Center for Applied Linguistics 2008).

Comprehensive Adult Student Assessment System (CASAS)

Accommodations in test administration procedures for the CASAS Assessment are available at <a href="https://www.casas.org/training-and-support/testing-guidelines/accommodations-guidelines-accommodatio

### Test of Adult Basic Education (TABE)

Accommodations in test administrations procedures for the TABE Assessment are available on the DRC website: http://tabetest.com/PDFs/TABE Guidelines to Inclusive Testing 2017.pdf

Test for Adult Basic Education-Complete Language Assessment System-English (TABE CLAS-E)

TABE CLAS-E provides large-print editions to accommodate examinees with special needs:

- Large-Print Edition Locator Test
- Large-Print Edition Language Proficiency Tests, Forms A and B
- Expository Writing Folios are incorporated in Large-Print Edition Test Books.

Additional information may be found on the <u>DRC</u> website: <a href="http://tabetest.com/PDFs/TABE Guidelines to Inclusive Testing 2017.pdf">http://tabetest.com/PDFs/TABE Guidelines to Inclusive Testing 2017.pdf</a>

Accommodations for approved assessments may differ from accommodations for an approved high school equivalency test.

A. Contact the current test publisher for the appropriate accommodation process at: <a href="http://hiset.ets.org/requirements/disabilities/accommodations">http://hiset.ets.org/requirements/disabilities/accommodations</a>

Although a student may receive accommodations for assessments for placement or to measure growth by a local program, this does not guarantee or imply that the same accommodations will be appropriate or provided for the approved high school equivalency test.

(All remaining sections of this policy will be added to the new WRU policy 1.103 (Assessment))

# Title: REPORTING INDICATORS OF PERFORMANCE

Authority: Board Action

Original Adoption: 02/09/2011

Effective Date: 02/09/2011

Last Revision: 06/12/2019

## **Reporting Indicators of Performance**

National Reporting System (NRS) policies mandate that all local adult education programs must report indicators of performance. Measured skill gains (Educational gains) are calculated on all learners in the program year, July 1–June 30. The other indicators are collected on students who exit during specific time periods each year. Indicators of Performance which must be reported include:

- 1. Measured Skill Gains that are in relation to the student's Educational Functioning Level (EFL) in reading, writing, speaking and listening, and functional areas. It is accomplished through making the gain on a pre/post-test comparison, attaining a high school diploma or the state recognized equivalency or \*entering a postsecondary education of training program. This measure applies to all students;
- 2. \*Students are tracked for Employment during the 2<sup>nd</sup> quarter after exit.
- 3. \*Students are tracked for Employment in the 4<sup>th</sup> quarter after exit.
- 4. \*The Median earnings of participants who are in unsubsidized employment during the second quarter after exit
- 5. \*Receipt of a Secondary Credential or recognized equivalent during participation or within 1 year after exit from the program. The receipt of a secondary diploma is only counted if the participant also enters postsecondary education or training, or employment within 1 year after exit.
- 5. \*Receipt of a recognized Postsecondary Credential during participation or within 1 year after exit from the program.

Programs must meet a minimum of 50 percent of the federally-approved in dicators of performance as measured by NRS Tables 4 and 5 annually.

<sup>\*</sup>Data-matching is used for these goals to measure program outcome.

{All remaining sections of this policy will be added to the new WRU policy 1.104 (Data)}

Title: Data Matching

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011
Last Revision: December 11, 2019

### **Data Matching**

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

- B. The SSN or ITIN of the individual student is used by the Louisiana Community and Technical College System (LCTCS) only to search records. The resulting data is reported in aggregate format without any individual identifiable information. Accurate Social Security Numbers Individual Taxpayer Identification 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 ITINs and are prohibited from "making up" a SSN or ITIN for a student. If a student fails to provide his/her SSN or ITIN, local programs should follow up with the student to obtain the SSNit. A student may refuse to provide his/her SSN or ITIN 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 and National Student Clearinghouse 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 for the Primary Indicators of Performance as outlined in WIOA.

**All remaining sections of this policy will be added to the new WRU policy 1.104 (Data)** 

Title: Data Accuracy and Entry

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011
Last Revision: December 11, 2019

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.

<del>Data</del>	Entry Guidelines
Social Security Number or	1. Enter the learner's real Social Security number.
Identifying Number	2. Enter the alien identification number if ESL 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
	<del>program is located).</del>

Data	Entry Guidelines
*Barriers to Employment	Indicate if the student is:
	1. Displaced homemaker,
	2. English language learner, low literacy level, cultural
	<del>barriers</del>
	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. The learner's enrollment status is either active or 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
	<del>policies.</del>
Attendance	1. Attendance must be 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.

<del>Data</del>	Entry Guidelines
*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.
Employment Status	The learner's employment status at 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.

## **Distance Learning**

- 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 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 <u>or remotely</u> using the state assessment policy <u>and test publisher guidelines</u>.

- 4. Programs will report all required NRS data elements on distance education students in the state approved data management system.
- 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.

**All remaining sections of this policy will be added to the new WRU policy 1.106 (Curriculum and Instruction)** 

**Title: State Approved Adult Education Data System** 

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011
Last Revision: December 11, 2019

### **State Approved Adult Education Data System**

The Louisiana Community and Technical College System (LCTCS) mandates that <u>funded</u> adult education programs, <u>which it funds</u>, must use the state-approved <u>Adult adult Education education</u> <u>Data data Systemsystem</u>. <u>Local programs are responsible for covering the costs of implementing and maintaining the system with a portion of their local grant funds</u>. 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 <u>Education education</u> staff shall participate in professional development training as specified in the State Plan.

{All remaining sections of this policy will be added to the new WRU policy 1.104 (Data)}

Title: Data Reporting and Analysis

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011
Last Revision: December 11, 2019

### **Data Reporting and Analysis**

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:

It is the responsibility of the local program 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 accurate entry into a data management system;
- the security procedures for sharing student data within the adult education program and with partners;
- a regular schedule to run the diagnostic features in the data management system to detect data problems and/or deviations; and
- the procedure for how data will be used for program evaluation and decisions for continuous program improvement.

#### State Level:

The data submitted by local programs will be continually reviewed by the Louisiana Community and Technical College System (LCTCS) staff at 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 SNs and ITINs. 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.

**All remaining sections of this policy will be added to the new WRU policy 1.104 (Data)** 

# Title: LOCAL PROGRAM ADMINISTRATION

Authority: Board Action	Original Adoption: Effective Date:	02/09/2011 02/09/2011
	Last Revision:	06/12/2019

### **State Oversight**

The Adult Education and High School Equivalency Testing Program shall be administered by the Louisiana Community and Technical College System (LCTCS) and operated by eligible entities as stipulated in the authorizing federal legislation. The LCTCS shall certify adult education sites of instruction using procedures as approved by the Board of Supervisors of the Louisiana Community and Technical College System (LTCS).

# **Program Income**

Funds received by local providers are to be used to establish and operate programs that provide adult education and literacy services. Any money collected in the program must be accounted for as program income. Program income is defined as "gross income received by the grantee or subgrantee directly generated by a grant supported activity or earned as a result of the grant agreement during the grant period." Program income is governed by the terms of the agreement between the state and local sub-grantee. Program income must be accounted for in program records and used only for costs allocable under Adult Education and Family Literacy Act (AEFLA). Program income may only be used to provide local adult education and literacy services. This can include the payment of salaries and purchase of materials.

In accordance with the Education Department General Administrative Regulations (EDGAR) at 2 C.F.R. §200.307 and 3 CFR 76.534, tuition monies and/or fees collected must be used for classes, coordination, supervision, and general administration of full- and part-time adult basic education programs, including responsibilities associated with the management of the finances of these programs.

#### Grant recipients shall:

- Notify WRU that program income will be collected during the fiscal year (including the proposed amount to be charged to students);
- Provide an income waiver process to eligible students. Fees charged to students participating in an adult education program must be equitably administered and must not reach levels that have an adverse effect on the participation of economically disadvantaged students;
- Complete and submit the Program Income Report Form(s) to LCTCS. If program income was collected during the fiscal year, a detail of all collections and expenditures by object code must be included in the annual submission.

- Program income must be spent on allowable costs under AEFLA and in accordance with EDGAR Requirements for *Use of Program Income* (2 C.F.R. § 200.307) and State requirements;
- Retain documentation and receipts for program income expenditures; and
- Expend collected program income funds before submitting reimbursement requests for awarded fiscal year funds.

Unless prior written approval is received from LCTCS, institutions of higher education and nonprofit research institutions must add program income to the federal award. For example, a recipient receives a WRU subgrant in the amount of \$30,000. The recipient receives program income in the amount of \$5,000. The recipient may request reimbursement for \$30,000, but is in effect running a \$35,000 program and must expend the \$5,000 of program income on allowable expenditures under the grant.

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

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

Grant recipients will report program income once during the grant award year for review by the state. The Program Income Report will be due at the end of the fourth quarter of the grant cycle. Certification of no program income is also due by the due date from any locality not collecting program income. Information about collecting and reporting program income will be included in all technical-assistance training related to grant reimbursements throughout the year. Program income will be monitored by LCTCS during collection times. Grant recipients not using program income in the appropriate and specified manner will receive written notification from LCTCS and may be subject to an on-site review. The Program Income Report form is available on the LCTCS website.

**(All remaining sections of this policy will be added to the new WRU policy 1.102 (Program Administration))** 

**Title: Requirements for Students** 

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011
Last Revision: December 11, 2019

### **Student Eligibility Requirements**

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).
  - 1. 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.

**All remaining sections of this policy will be added to the new WRU policy 1.102 (Program Administration)** 

# **Title: High School Equivalency Guidelines**

**Authority**: Board Action **Original Adoption**: February 9, 2011 **Effective Date**: February 9, 2011

Last Revision: December 11, 2019

## **High School Equivalency Guidelines**

### A. Age Requirements

- 1. A student shall be 17 years of age or older in order to be authorized to be administered the High School Equivalency Test.
- 2. A married or emancipated individual may be permitted to take the 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 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 student scheduling the High School Equivalency Test.
- 5. Individuals 15 years of age and below shall not be permitted to take the 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 High School Equivalency Test by taking the State approved Official 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 High School Equivalency Test by taking the State-approved Official Practice Test and 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 High School Equivalency Test.
- 4. The High School Equivalency Test may not be administered to candidates who are enrolled in an accredited high school unless they are enrolled in a state-recognized K-12 Options Program.
- 5. The High School Equivalency Test may not be administered to candidates who have graduated from an accredited high school.

**All remaining sections of this policy will be added to the new WRU policy 1.105 (High School Equivalency)** 

**Title: High School Equivalency Attainment** 

Authority: Board Action

Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: September 20, 2017

### **Methods of High School Equivalency Attainment**

Act #732 of the 2010 Regular Legislative Session designated the Board of Supervisors of the Louisiana Community and Technical College System (LCTCS) to adopt such rules and regulations as necessary to establish, operate, and maintain a statewide program of adult education to eliminate adult illiteracy and provide opportunities to adults to pursue a course or courses of student with upon completion will entitle them to be issued a Louisiana high school equivalency. The Board of Supervisors of the LCTCS is the sole granter of high school equivalency degrees in Louisiana.

The LCTCS Board of Supervisors authorizes the following options as means of attainment of the high school equivalency in Louisiana:

A. Completion of College Preparation Coursework

A student can demonstrate college readiness by <u>eompleting completion of</u> developmental coursework <u>in Mathematics</u>, <u>English and Reading</u> at an LCTCS college. Courses need not be taken at the same LCTCS college.

Student Eligibility: Must be at least 18 years of age and not enrolled in high school.

B. Completion of a College Placement Assessment

A student can earn the minimum standard score on an approved placement test that is based on established placement scores of recognized college readiness assessments in Mathematics, English, and Reading. A performance level congruency alignment will be reviewed annually by the LCTCS.

Student Eligibility: Must be at least 18 years of age and not enrolled in high school.

C. Completion of the High School Equivalency Test

A student can earn the minimum standard score that is based on the standard score recommendations from the High School Equivalency Test provider. Student Eligibility: Eligibility for those under 18 years of age will be governed by policies established by the Louisiana Board of Elementary and Secondary Education.

Those over 18 years of age who hold no high school diploma and are not enrolled in high school are eligible without conditions.

# D. Completion of an Integrated Career Pathway

A student can successfully complete an integrated career pathway coursework portfolio encompassing completion of 12 credit hours of technical education course work, earned recognized Industry Based Certificate (IBC), in combination with basic skills knowledge reflected by minimum standard scores on a recognized adult education assessment that is based on the standard score recommendations from the assessment provider in conjunction with Louisiana high school graduate performance level congruence alignment. Student Eligibility: Must be at least 18 years of age and not enrolled in high school.

### E. Combination of Attainment Methods

As appropriate, a student may combine attainment methods detailed in this policy for options A and B to reflect mastery of basic skills necessary to earn a Louisiana High School Equivalency. Student Eligibility: Must be at least 18 years of age and not enrolled in high school.

The LCTCS Board of Supervisors will make no distinction on the method used to attain the high school equivalency when granting the equivalency. The System President is responsible for implementing this policy.

**All remaining sections of this policy will be added to the new WRU policy 1.105 (High School Equivalency)** 

# Title: REQUIREMENTS FOR HIGH SCHOOL EQUIVALENCY RETESTING

Authority: Board Action

Original Adoption: 02/09/2011

Effective Date: 02/09/2011

Last Revision: 06/12/2019

### **Requirements for High School Equivalency Retesting**

A test candidate may not retest before 30 days have elapsed since the student last tested. Retesting shall be performed on alternate forms of the tests within a calendar year. No form may be used a second time within a calendar year. Approval may be granted for special circumstances by the Louisiana Chief Examiner.

**(All remaining sections of this policy will be added to the new WRU policy 1.105 (High School Equivalency))** 

## Title: <u>ISSUANCE OF EQUIVALENCY DIPLOMAS</u>

Authority: Board Action	Original Adoption: Effective Date:	02/09/2011 02/09/2011
	Last Revision:	06/19/2019

### **Issuance of Equivalency Diplomas**

A high school equivalency diploma will be issued from the Louisiana Community and Technical College System (LCTCS) after the student has successfully completed an approved high school equivalency test or the portfolio review process demonstrating evidence of college-level career class proficiency and basic skills attainment by meeting the requirements for educational attainment through LCTCS WorkReady U Policy 1.118outlined in this policy.

An official copy of results of high school equivalency tests administered to a Louisiana citizen/resident as well as an official copy of results of high school equivalency tests administered in the State of Louisiana shall be submitted by the high school equivalency testing company to LCTCS no later than 30 days following the calculation of test results.

A Louisiana resident who successfully completes an approved high school equivalency test at an official out-of-state testing center may be entitled to receive an equivalency diploma, provided that an official copy of the high school equivalency test results are submitted for review to the LCTCS and provided that the student meets all other qualifications to receive an equivalency diploma.

To be eligible for an equivalency diploma based on results of an approved high school equivalency test, a veteran or member of the Armed Forces shall be a legal resident of Louisiana for six consecutive months or shall have formerly attended a Louisiana school.

A student who has earned a Louisiana High School Equivalency Diploma issued by the LCTCS is considered a Louisiana high school graduate in every respect.

Louisiana high school equivalency diplomas shall be signed by the President of the Louisiana Community and Technical College Systems and the Board Chair of the Board of Supervisors of the Louisiana Community and Technical College System.

**(All remaining sections of this policy will be added to the new WRU policy 1.105 (High School Equivalency))** 

Title: Adult Education and High School Equivalency Authority

Authority: Board Action Original Adoption: 06/12/19

**Effective Date**: 06/12/19 **Last Revision**: 06/12/19

Revised Statute 17:3217.1 authorizes the Louisiana Community and Technical College System to: Adopt such rules and regulations as are necessary to establish, operate, and maintain a statewide program of adult education to eliminate adult illiteracy and to provide opportunities for adults to pursue a course or courses of study which upon completion will entitle them to be issued a Louisiana high school equivalency diploma.

Therefore, all entities offering Adult Education services in the state of Louisiana leading to the issuance of a high school equivalency diploma must register and receive approval from the LCTCS.

- 1. Those programs/providers who are funded through WIOA Title II: Adult Education and Literacy competitive process are approved to provide the services.
- 2. Other Programs will have to submit a request for approval to be reviewed by LCTCS to ensure quality of service.

**All remaining sections of this policy will be added to the new WRU policy 1.102 (Program Administration)** 

Title: WorkReady U - Legislative Authority & Accountability

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: December 11, 2019

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 WIOA and the WIOA State Plan for Louisiana in order to:

- Assist adults to become literate and obtain the knowledge and skills needed for employment, economic self-sufficiency, and transition to postsecondary education
- 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. Eligible providers of adult education are required by law, the Workforce Innovation and Opportunity Act (WIOA), 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.

The WorkReady U 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 through the Louisiana Community and Technical College System. Providers 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 federal and state policies and procedures 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: WorkReady U – Program Administration

Authority: Board Action Original Adoption: February 9, 2011

**Effective Date**: February 9, 2011 **Last Revision**: November 14, 2012

### State Oversight

The Adult Education and High School Equivalency Testing Program shall be administered by the Louisiana Community and Technical College System (LCTCS) and operated by eligible entities as stipulated in the authorizing federal legislation. The LCTCS shall certify adult education sites of instruction using procedures as approved by the Board of Supervisors of the Louisiana Community and Technical College System (LCTCS).

Louisiana state law established adult education under the jurisdiction of the LCTCS, and LCTCS serves as the administrative entity for Title II, Adult Education (Louisiana Revised Statute 17:2317.1D, Acts 132 & 732 of the 2010 Regular Session) for the purpose of establishing and maintaining adult education programs to conduct adult education classes. Adult Education Services is the unit within LCTCS responsible for the administration and oversight of Louisiana's statewide adult education system.

## **Student Eligibility Requirements**

- 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).
  - 1. 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.
  - 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.

### Eligible Providers

In adherence to WIOA, organizations with demonstrated effectiveness in providing adult education and literacy activities may include:

- Local educational agencies;
- Community-based or faith-based organizations;
- Volunteer literacy organizations;
- <u>Institutions of higher education</u>;
- Public or private nonprofit agencies;
- Libraries:
- Public housing authorities;
- Nonprofit institutions that are not described above and have the ability to provide adult education and literacy activities to eligible individuals;
- Consortia or coalitions of agencies, organizations, institutions, libraries or authorities described above; and
- Partnerships between an employer and an entity described above

### **Allowable Activities**

The following services and activities are allowable under WIOA Title II:

- Adult Education and Literacy:
  - Adult Basic Education (ABE): A program of academic instruction and education
     services below the secondary level that increase an individual's ability to read,
     write, and speak in English and perform mathematics necessary to attain a
     secondary school diploma or its recognized equivalent, transition to postsecondary
     education or training, and obtain employment.
  - Adult Secondary Education (ASE): A program of academic instruction and educational services at the secondary level that increase an individual's ability to

- read, write, and perform mathematics necessary to attain a secondary school diploma or its recognized equivalent, transition to postsecondary education or training, and obtain employment.
- ESL/English Language Acquisition: A program of instruction designed to help eligible individuals who are English language learners (ELLs) to achieve competence in reading, writing, speaking and comprehension of the English language, and that leads to attainment of a secondary school diploma or its recognized equivalent and transition to postsecondary education and training or employment.
- Workforce Preparation: A program designed to include activities/services to individuals needing to acquire a combination of basic academic skills, critical thinking skills, digital literacy skills and self-management skills, Participation in workforce preparation activities also must be designed to lead to employability skills and the development of competencies in using resources and information, working with others, and understanding systems to successfully transition to and complete postsecondary education, training and employment. WIOA Final Rules Subpart D, §463.34
- Workplace Adult Education and Literacy: A program designed to provide service/activities in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce through the improvement of literacy skills. WIOA Final Rules Subpart D, §463.30
- Integrated Education and Training (IET): A service approach designed to provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. Required IET components are: 1) adult education and literacy, 2) workforce preparation activities, and 3) workforce training. Instruction is based on occupationally relevant materials for the purpose of educational and career advancement. Participation is intended for eligible individuals at all skill levels, including adults with low academic skills. WIOA Final Rules Subpart D, §463.35 through §463.38
- Integrated English Literacy and Civics Education (IELCE): A program of instruction funded under WIOA, Section 243, designed to include education services provided to English language learners who are adults, including professionals with degrees and credentials to language and acquire the basic and more advanced skills needed to function effectively as English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training. In addition, the program must be provided in combination with IET. WIOA Final Rules Subpart D, §463.33
- Correctional Education: A program of instruction funded under WIOA, Section 225, designed to include ABE, ASE, or ELL instruction for adult criminal offenders in correctional institutions. Section 225 funds are the only allowable Title II funds that may be used to serve individuals within a correctional institution. The term "correctional institution" as defined in WIOA means any—prison; jail; reformatory; work farm; detention center; or halfway house, community-based rehabilitation center, OR any other similar institution designed for the confinement OR rehabilitation of criminal offenders.

# Adult Education & High School Equivalency Authority

Revised Statute 17:3217.1 authorizes the Louisiana Community and Technical College System to: Adopt such rules and regulations as are necessary to establish, operate, and

maintain a statewide program of adult education to eliminate adult illiteracy and to provide opportunities for adults to pursue a course or courses of study which upon completion will entitle them to be issued a Louisiana high school equivalency diploma.

Therefore, all entities offering Adult Education services in the state of Louisiana leading to the issuance of a high school equivalency diploma must register and receive approval from the LCTCS.

- 1. Those programs/providers who are funded through WIOA Title II: Adult Education and Literacy competitive process are approved to provide the services.
- 2. Other Programs will have to submit a request for approval to be reviewed by LCTCS to ensure quality of service.

#### **Program Income**

Funds received by local providers are to be used to establish and operate programs that provide adult education and literacy services. Any money collected in the program must be accounted for as program income. Program income is defined as "gross income received by the grantee or sub-grantee directly generated by a grant supported activity or earned as a result of the grant agreement during the grant period." Program income is governed by the terms of the agreement between the state and local sub-grantee. Program income must be accounted for in program records and used only for costs allocable under Adult Education and Family Literacy Act (AEFLA). Program income may only be used to provide local adult education and literacy services. This can include the payment of salaries and purchase of materials.

In accordance with the Education Department General Administrative Regulations (EDGAR) at 2 C.F.R. §200.307 and 3 CFR 76.534, tuition monies and/or fees collected must be used for classes, coordination, supervision, and general administration of full- and part-time adult basic education programs, including responsibilities associated with the management of the finances of these programs.

#### Grant recipients shall:

- Notify WRU that program income will be collected during the fiscal year (including the proposed amount to be charged to students);
- Provide an income waiver process to eligible students. Fees charged to students
  participating in an adult education program must be equitably administered and
  must not reach levels that have an adverse effect on the participation of
  economically disadvantaged students;
- Complete and submit the Program Income Report Form(s) to LCTCS. If program
  income was collected during the fiscal year, a detail of all collections and
  expenditures by object code must be included in the annual submission.
- Program income must be spent on allowable costs under AEFLA and in accordance with EDGAR Requirements for *Use of Program Income* (2 C.F.R. § 200.307) and State requirements;
- Retain documentation and receipts for program income expenditures; and

 Expend collected program income funds before submitting reimbursement requests for awarded fiscal year funds.

Unless prior written approval is received from LCTCS, institutions of higher education and nonprofit research institutions must add program income to the federal award. For example, a recipient receives a WRU subgrant in the amount of \$30,000. The recipient receives program income in the amount of \$5,000. The recipient may request reimbursement for \$30,000, but is in effect running a \$35,000 program and must expend the \$5,000 of program income on allowable expenditures under the grant.

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

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

Grant recipients will report program income once during the grant award year for review by the state. The Program Income Report will be due at the end of the fourth quarter of the grant cycle. Certification of no program income is also due by the due date from any locality not collecting program income. Information about collecting and reporting program income will be included in all technical-assistance training related to grant reimbursements throughout the year. Program income will be monitored by LCTCS during collection times. Grant recipients not using program income in the appropriate and specified manner will receive written notification from LCTCS and may be subject to an on-site review. The Program Income Report form is available on the LCTCS website.

Title: WorkReady U - Assessment

Authority: Board Action Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: Initial

## **Federal Requirements**

- 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 within the first 12 hours of attendance.
- B. Each local director is responsible for training staff members 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. 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 regular professional development on topics such as, but not limited to, 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.

#### **Approved Assessments**

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 11/12);
  - 2. Comprehensive Adult Student Assessment System (CASAS);
- 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).

## **Placement in Educational Functioning Levels**

- A. Upon administration of an approved assessment, at intake or within the first 12 hours of attendance, local programs are to place students at an educational functioning level. When available, local programs should administer an appraisal or locator prior to the full assessment. Charts provided by the National Reporting System (NRS), <a href="Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act,">Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act,</a> shall be used for determining the appropriate Educational Functioning Level (EFL) for a student. The Educational Functioning Level chart can be found on the NRS website, <a href="https://www.nrsweb.org/training-ta/ta-tools/assessment#Tools&Tips">https://www.nrsweb.org/training-ta/ta-tools/assessment#Tools&Tips</a> (NRS Test Benchmarks for EFL).
- B. Student progression can only be shown through the administration of an approved pretest and post-test, by receiving the state-approved high school equivalency (HSE), or by exiting Adult Education and enrolling in a post-secondary training program.
- C. Students who test out of range of an NRS Educational Functioning level should be retested according to test publisher guidelines.

#### **Post-Test Assessments**

National Reporting Systems (NRS) reporting policies state that programs must use a different form of the same test for the follow-up (post-test) assessment for a student. Both the pre-test and post-test shall be administered and scored according to the test directions provided by the test publisher. Programs shall adhere to the minimum post-testing guidelines listed below to determine educational gain and academic progress. Students who meet the minimum post-testing guidelines for each assessment must be post-tested. Additional post-tests must follow established post-testing guidelines. Assessments have an effective date of 180 calendar days (defined as weekdays, weekends, and holidays) from the test administration date.

Providers that offer coordinated/planned instructional sessions may administer the post-test assessment at the conclusion of each instructional session, in order to support the student cohort and transition to college and career readiness. Providers must submit basic skill instructional schedule and integrated career pathway course schedule to the WRU office through the statewide database.

Programs for Corrections Education and Other Institutionalized Individuals may post-test according to the recommended hours of instruction **or** after enrollment for 90 days in the instructional program.

### **Informal and Supplemental Assessment**

In addition to the approved standardized assessments, programs are encouraged to use a variety of informal assessments to guide instruction. The use of teacher-made tests, unit tests, portfolios, applied performance assessments, and learner observations can be used to monitor learning and guide instruction. However, programs may only use approved methods to report learner *gains* for the NRS.

### **Testing Accommodations**

Accommodations for adult learners, who self-disclose a disability documented by a qualified professional and are eligible for accommodations under the provisions of Section 504 of the Americans with Disabilities Act (ADA), may be granted appropriate testing accommodations. Adult Education programs must document that adult learners were given the opportunity to self-disclose any disability during the student orientation process.

Assessments for special populations are administered with appropriate accommodations as specified by the test publisher of the approved assessment.

Title: WorkReady U - Data

Authority: Board Action Original Adoption: February 9, 2011

**Effective Date**: February 9, 2011

Last Revision: Initial

## **State Approved Adult Education Data System**

The Louisiana Community and Technical College System (LCTCS) mandates that adult education programs must use the state-approved adult education data system. 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.

### **Reporting Indicators of Performance**

National Reporting System (NRS) policies mandate that all local adult education programs must report indicators of performance. Measured skill gains (Educational gains) are calculated on all learners in the program year, July 1–June 30. The other indicators are collected on students who exit during specific time periods each year. Indicators of Performance which must be reported include:

- Measured Skill Gains that are in relation to the student's Educational Functioning Level (EFL) in reading, writing, speaking and listening, and functional areas. It is accomplished through making the gain on a pre/post-test comparison, attaining a high school diploma or the state recognized equivalency or \*entering a postsecondary education or training program. This measure applies to all students;
- 2. \*Students are tracked for Employment during the 2nd guarter after exit.
- 3. \*Students are tracked for Employment in the 4th quarter after exit.
- 4. \*The Median earnings of participants who are in unsubsidized employment during the second quarter after exit
- 5. \*Receipt of a Secondary Credential or recognized equivalent during participation or within 1 year after exit from the program. The receipt of a secondary diploma is only

- counted if the participant also enters postsecondary education or training, or employment within 1 year after exit.
- 6. \*Receipt of a recognized Postsecondary Credential during participation or within 1 year after exit from the program.

\*Data-matching is used for these goals to measure program outcome.

## **Data Matching**

- A. The state of Louisiana uses data matching as the methodology to follow up on the National Reporting System (NRS) primary indicators of performance. The Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN) of the learner will be used to match data with Louisiana Workforce Commission (LWC) employment records, the National Student Clearinghouse post-secondary enrollment records, and for other federal or state required reports.
- B. The SSN or ITIN of the individual student is used by the Louisiana Community and Technical College System (LCTCS) only to search records. The resulting data is reported in aggregate format without any individual identifiable information. Accurate Social Security Numbers and Individual Taxpayer Identification 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 ITINs and are prohibited from "making up" a SSN or ITIN for a student. If a student fails to provide his/her SSN or ITIN, local programs should follow up with the student to obtain it. A student may refuse to provide his/her SSN or ITIN 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 and National Student Clearinghouse 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 for the Primary Indicators of Performance as outlined in WIOA.

### **Data Reporting and Analysis**

- 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:

It is the responsibility of the local program 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 accurate entry into a data management system;
- the security procedures for sharing student data within the adult education program and with partners;

- a regular schedule to run the diagnostic features in the data management system to detect data problems and/or deviations; and
- the procedure for how data will be used for program evaluation and decisions for continuous program improvement.

#### C. State Level:

The data submitted by local programs will be continually reviewed by the Louisiana Community and Technical College System (LCTCS) staff at 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 SSNs and ITINs. Staff reviews data using other searches to determine if additional data analysis problems and deviations exist. LCTCS staff shall send a report to local program directors detailing any data analysis problems or deviations.

**Title:** WorkReady U – High School Equivalency

Authority: Board Action Original Adoption: February 9, 2011

**Effective Date**: February 9, 2011 **Last Revision**: November 13, 2013

## **High School Equivalency Guidelines**

#### A. Age Requirements

- 1. A student shall be 17 years of age or older in order to be authorized to be administered the High School Equivalency Test.
- 2. A married or emancipated individual may be permitted to take the 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 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 student scheduling the High School Equivalency Test.
- 5. Individuals 15 years of age and below shall not be permitted to take the 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 High School Equivalency Test by taking the State approved Official High School Equivalency Practice Test.
- Individuals between 17-18 years of age or 16 years of age with an approved age waiver may qualify for the High School Equivalency Test by taking the Stateapproved Official Practice Test and achieve qualifying scores as established by the State.
- 3. Qualifying scores on the Official Half-Length 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 High School Equivalency Test.
- 4. The High School Equivalency Test may not be administered to candidates who are enrolled in an accredited high school unless they are enrolled in a state-recognized K-12 Options Program.
- 5. The High School Equivalency Test may not be administered to candidates who have graduated from an accredited high school.

## **Methods of High School Equivalency Attainment**

Act #732 of the 2010 Regular Legislative Session designated the Board of Supervisors of the Louisiana Community and Technical College System (LCTCS) to adopt such rules and regulations as necessary to establish, operate, and maintain a statewide program of adult education to eliminate adult illiteracy and provide opportunities to adults to pursue a course or courses of student with upon completion will entitle them to be issued a Louisiana high school equivalency. The Board of Supervisors of the LCTCS is the sole granter of high school equivalency degrees in Louisiana.

The LCTCS Board of Supervisors authorizes the following options as means of attainment of the high school equivalency in Louisiana:

#### A. Completion of College Preparation Coursework

A student can demonstrate college readiness by completion of developmental coursework at an LCTCS college. Courses need not be taken at the same LCTCS college.

Student Eligibility: Must be at least 18 years of age and not enrolled in high school.

#### B. Completion of a College Placement Assessment

A student can earn the minimum standard score on an approved placement test that is based on established placement scores of recognized college readiness. A performance level congruency alignment will be reviewed annually by the LCTCS. Student Eligibility: Must be at least 18 years of age and not enrolled in high school.

#### C. Completion of the High School Equivalency Test

A student can earn the minimum standard score that is based on the standard score recommendations from the High School Equivalency Test provider.

Student Eligibility: Eligibility for those under 18 years of age will be governed by policies established by the Louisiana Board of Elementary and Secondary Education.

Those over 18 years of age who hold no high school diploma and are not enrolled in high school are eligible without conditions.

#### D. Completion of an Integrated Career Pathway

A student can successfully complete an integrated career pathway coursework portfolio encompassing completion of 12 credit hours of technical education course work, earned recognized Industry Based Certificate (IBC), in combination with basic skills knowledge reflected by minimum standard scores on a recognized adult education assessment that is based on the standard score recommendations from the assessment provider in conjunction with Louisiana high school graduate performance level congruence alignment.

Student Eligibility: Must be at least 18 years of age and not enrolled in high school.

#### E. Combination of Attainment Methods

As appropriate, a student may combine attainment methods detailed in this policy for options A and B to reflect mastery of basic skills necessary to earn a Louisiana High School Equivalency.

Student Eligibility: Must be at least 18 years of age and not enrolled in high school.

The LCTCS Board of Supervisors will make no distinction on the method used to attain the high school equivalency when granting the equivalency. The System President is responsible for implementing this policy.

## Requirements for High School Equivalency Re-Testing

A test candidate may not retest before 30 days have elapsed since the student last tested. Retesting shall be performed on alternate forms of the tests within a calendar year. No form may be used a second time within a calendar year. Approval may be granted for special circumstances by the Louisiana Chief Examiner.

## **Issuance of Equivalency Diplomas**

A high school equivalency diploma will be issued from the Louisiana Community and Technical College System (LCTCS) after the student has successfully completed an approved high school equivalency test or the portfolio review process demonstrating evidence of college-level career class proficiency and basic skills attainment by meeting the requirements for educational attainment outlined in this policy.

An official copy of results of high school equivalency tests administered to a Louisiana citizen/resident as well as an official copy of results of high school equivalency tests administered in the State of Louisiana shall be submitted by the high school equivalency testing company to LCTCS no later than 30 days following the calculation of test results.

A Louisiana resident who successfully completes an approved high school equivalency test at an official out-of-state testing center may be entitled to receive an equivalency diploma, provided that an official copy of the high school equivalency test results are submitted for review to the LCTCS and provided that the student meets all other qualifications to receive an equivalency diploma.

To be eligible for an equivalency diploma based on results of an approved high school equivalency test, a veteran or member of the Armed Forces shall be a legal resident of Louisiana for six consecutive months or shall have formerly attended a Louisiana school.

A student who has earned a Louisiana High School Equivalency Diploma issued by the LCTCS is considered a Louisiana high school graduate in every respect.

Louisiana high school equivalency diplomas shall be signed by the President of the Louisiana Community and Technical College Systems and the Board Chair of the Board of Supervisors of the Louisiana Community and Technical College System.

**Title:** WorkReady U – Curriculum and Instruction

Authority: Board Action Original Adoption:

**Effective Date:** 

Last Revision:

## **Standards-Aligned Curriculum**

WorkReady U programs shall follow a standards-aligned curriculum. The standards listed below provide clear expectations for students, teachers, and other stakeholders. Building on a foundation of clear expectations and educator effectiveness, standards support higher and deeper levels of learning for students and aid in educator growth leading to improved teaching and greater learning outcomes.

- The College and Career Readiness Standards (CCRS) for Adult Education is a set of college and career readiness standards that reflect the content most relevant to preparing adult students for success in colleges, technical training programs, work and citizenship—in the areas of English language arts/literacy and mathematics.
   https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf
- The English Language Proficiency (ELP) Standards for Adult Education correspond to the CCRS for English Language Arts and Literacy, and Mathematical and Science Practices and are intended to address the urgent need for educational equity, access, and rigor for adult English language learners (ELLs). https://lincs.ed.gov/publications/pdf/elp-standards-adult-ed.pdf
- The *Employability Skills Framework* is a resource from the Office of Career and Technical Adult Education (OCTAE) for information and tools to inform the instruction and assessment of employability skills
  - http://cte.ed.gov/employabilityskills/index.php/background/what#
- The Northstar Digital Literacy Standards define the basic skills needed to perform tasks on computers and online. Northstar's standards and modules cover the following categories: essential computer skills, essential software skills, and using technology in daily life.
  - https://www.digitalliteracyassessment.org/assessment-info

### **Distance Learning**

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 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 contact hours with the program.
- 3. Pre-tests and post-tests are to be administered in person or remotely using the state assessment policy and test publisher guidelines.
- 4. Programs will report all required NRS data elements on distance education students in the state approved data management system.