

# Adult Education Policy Manual

## (Revised 06/2008)

Staff members of Kansas Board of Regents Adult Education thank the Adult Education Advisory Committee for their tireless efforts in designing and contributing to this policy and procedures manual, a first in the history of Kansas Adult Education. Without the guidance of the committee and the creativity of adult educators across the state, this manual would not exist.

The manual is designed in sections for periodic updates as needed – please help keep your manual as current as possible by regularly adding in new sections and destroying outdated sections. Please encourage all adult education staff members in your program to read and thoughtfully practice the procedures detailed below.

For more information on any of the policies in this manual, please contact KBOR Adult Education staff at: 785-296-0175.

Complements to this manual include the following documents: the *Kansas Four Year State Plan* (and the current fiscal year's extension plan), PABLO users' manual, *The Comprehensive Adult Education Planner*, and *Accommodating Adults with Disabilities in Adult Education Programs, Revised 2005*.

### Sections:

- 1. Acronyms and Definitions**
- 2. Indicators of a Quality Adult Education Program**
- 3. Staff Qualifications and Professional Development**
- 4. Services to Learners**
- 5. Research-based Practice**
- 6. Funding**
- 7. Services to Individuals with Disabilities**
- 8. Environment**
- 9. Basic Skills Certification**
- 10. Evaluation and Record Keeping**
- 11. Assessment**

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## 1. Acronyms and Definitions

**ABE:** Adult Basic Education (Educational Functioning Levels 1 through 4)

**ADA:** Americans with Disabilities Act

**AEFLA:** *Adult Education and Family Literacy Act*, Title II of the *Workforce Investment Act* which funds adult education services in Kansas

**ASE:** Adult Secondary Education (Educational Functioning Levels 5 and 6)

**CASAS:** Comprehensive Adult Student Assessment System, a national assessment-to-instruction system based on competencies identified as essential for adults to function effectively in their multiple life roles of employees, family members and community members

**COABE:** Commission on Adult Basic Education, a national professional association for adult educators

**DAEL:** Division of Adult Education and Literacy, the division of the United States Department of Education responsible for oversight of AEFLA

**ELCE:** English Literacy and Civics Education, federal funding for services to adults in need of English language instruction, skills necessary to pass the U.S. Citizenship examination, technology skills, and competencies in governmental, educational and workplace systems

**ESL:** English as a Second Language (Levels 7 through 12)

**ESOL:** English for Speakers of Other Languages (alternative term for ESL)

**FERPA:** The Family Educational Rights and Privacy Act, legislation protecting the rights of learners' educational records to privacy and guarding how educational records are shared within agencies or with other agencies

**GED:** General Educational Development Test battery; if passed, an examinee receives the Kansas State High School Diploma

**IDEA:** Individuals with Disabilities Education Act, federal legislation on education services for individuals with disabilities

**IEP** = Individual Education Plan, a required plan of action and educational support for pupils with disabilities in public schools

**LD** = Learning Disability

**OHI** = Other Health Impairment

**SED** = Severe Emotional Disturbance

**SLD** = Specific Learning Disability

**KAEA:** Kansas Adult Education Association, a state professional association for adult educators

**KBOR:** Kansas Board of Regents, state agency for post-secondary education that administers AEFLA funding and distributes funds to eligible local programs

**LEP:** Limited English Proficiency, status of learners with limited English language skills

**MVAEA:** Missouri Valley Adult Education Association, a Midwest regional professional association for adult educators

**NRS:** National Reporting System for data collection and reporting as required under AEFLA – data is collected on PABLO in Kansas

**OPT:** Official GED Practice Tests, a half or full-length version of the GED Tests used to determine a learner’s readiness for the GED Test battery

**OVAE:** Office of Vocational and Adult Education, office in the United States Department of Education where DAEL is housed

**PABLO:** the web-based Kansas adult education data collection and reporting system that conforms to the requirements of the National Reporting System (NRS)

**Pre-GED:** Instructional services to adults whose skill levels are between ABE and ASE

**PSE:** Post-secondary education or other training at the post-secondary level (goal or outcome)

**USDOE:** U.S. Department of Education, federal agency which oversees AEFLA

**WIA:** Workforce Investment Act, a block grant of workforce development legislation, of which adult education is Title II

**Statute # 72-4517**

**Chapter 72: SCHOOLS**

**Article 45: ADULT EDUCATION PROGRAMS**

**Title: Definitions.**

**Text:** As used in this act:

(a) "Board" means the board of education of any school district or the board of trustees of any community college.

(b) "State board" means the state board of regents.

(c) "State plan" means the plan for adult basic education programs prepared and adopted by the state board in accordance with state and federal law.

(d) "Adult basic education program" means a program of one or more courses in general education subjects taught at the grade school or high school level under the supervision of a board for eligible persons which is included in the state plan and for which federal funds are received pursuant to federal law.

(e) "Eligible persons" means persons who (1) have attained the age of 16, (2) have not graduated from high school and have not been recognized as having achieved an equivalent level of education, and (3) are not now regularly enrolled in school.

(f) "Adult supplementary education program" means a program of one or more courses in any subject, other than courses in the adult basic education program or courses approved for state funding purposes, which is conducted under the supervision of a board for persons who have attained the age of 16.

(g) "Federal law" means the adult education act of 1966 (title III, P.L. 89-750), and acts amendatory thereof.

History: L. 1974, ch. 311, § 1; L. 1999, ch. 147, § 116; L. 2000, ch. 86, § 4; April 20.

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## 2. Indicators of a Quality Adult Education Program Including Standards and Measures

**Effective July 1, 2008**

**Note:** Section references in [ ] refer to relevant sections of the Adult Education and Family Literacy Act, Title II of the Workforce Investment Act. Indicators with a \*\* are state-imposed requirements.

1. Participants in the program are fully representative of the undereducated population in the service area, including limited English proficient adults [AEFLA, Section 231 (e)(12)]. The program serves the “most-in-need/hardest-to-serve” members of the community [AEFLA, Section 231 (e)(2) and (e)(3)].

### Measure 1.1

<b>The program serves participants who are representative of the ethnic diversity of the under-educated population in the program’s service area, including limited English proficient adults. (2 points)</b>		
<b>High (2 pts.)</b>	<b>The <i>percentage</i> of each ethnic group served by the program adequately reflects those identified as qualifying for services according to the most current U. S. Census and Kansas data.</b>	
<b>Medium (1 pt.)</b>	<b>The <i>percentage</i> of each ethnic group served by the program somewhat reflects those identified as qualifying for services according to the most current U. S. Census and Kansas data.</b>	
<b>Low (0 pts.)</b>	<b>The <i>percentage</i> of each ethnic group served by the program does not reflect those identified as qualifying for services according to the most current U. S. Census and Kansas data.</b>	

**NOTE:** All programs will access common U.S. Census and Kansas data sources for standardized determination of ethnic diversity by county. Further detail on accessing these common data sources will be available from KBOR adult education staff or the most current Request for Proposal application packet.

### Definitions:

Participant – adult learner who participates in instructional activities in an adult education program for 12 or more hours.

Undereducated population – adults 16 and over without a high school diploma or GED, or those with a high school diploma or higher level of education that have identified low skill levels or low levels of English proficiency.

Service area – the county or counties the adult education program serves.

Each ethnic group – the number of participants in each of the ethnic groups as determined by U.S. Department of Education definitions.

### Measure 1.2

<b>The program serves participants at the lowest levels of educational attainment. (8 points)</b>		
	<b>High (8 pts.)</b>	<b>35% or more of participants enter at one of the six “Beginning Levels” (Levels 1, 2, 7, 8, 9 or 10 in Outcomes Measures Definitions).</b>
	<b>Medium (4 pts.)</b>	<b>25% to 34% of participants enter at one of the six “Beginning Levels” (Levels 1, 2, 7, 8, 9 or 10 in Outcomes Measures Definitions).</b>
	<b>Low (0 pts.)</b>	<b>Less than 25% of participants enter at one of the five “Beginning Levels” (Levels 1, 2, 7, 8, 9 or 10 in Outcomes Measures Definitions).</b>

#### Definitions:

Beginning levels – includes Beginning ABE Literacy, Beginning Basic Education, Beginning ESL Literacy, Low Beginning ESL, High Beginning ESL, and Low Intermediate ESL (at or below CASAS score of 210) as defined in Outcome Measures Definitions.

Enter – the classification of a participant’s level is determined when the participant begins or returns to the adult education program for the first time within the current year.

### Measure 1.3

<b>The program serves participants with documented disabilities. (4 points)</b>		
	<b>High (4 pts.)</b>	<b>Ten percent (10%) or more of participants have documented disabilities and the program provides appropriate services and/or accommodations.</b>
	<b>Medium (2 pts.)</b>	<b>Five percent (5%) to nine percent (9%) of participants have documented disabilities and the program provides appropriate services and/or accommodations.</b>
	<b>Low (0 pts.)</b>	<b>Less than five percent (5%) of participants have documented disabilities and the program provides appropriate services and/or accommodations.</b>

#### Definitions:

Documented disabilities – in the case of a physical disability, documentation consists of information provided on **Initial Documentation of Disability** form and maintained in the learner’s file. This information includes the nature of the disability and how it was accommodated (e.g., “The learner entered in a wheelchair, was informed of accessible facilities within the center, and requested and was offered a table or computer terminal at an accessible height.”).

In the case of **learning or other “invisible” disability**, documentation follows ADA guidelines, and includes confirmation of a disability through such evidence as school records (such as an IEP or evidence of special education services) or the diagnosis of a qualified psychologist or medical doctor within the last 10 years. This information should be noted on the **Summary of Information from Diagnostic Testing for Confirmation of a Specific Learning Disability or Other Hidden Disabilities** form and maintained in the learner’s file. Participant’s self diagnosis of a disability does not constitute documentation of a learning disability. Results from screening instruments or learning style surveys do not constitute documentation of a learning disability.

**NOTE:** Documentation of a “specific learning disability” is much more narrowly defined for federal reporting on PABLO.

Appropriate services and/or accommodations – program maintains evidence in the participant’s file on the **Follow-up Documentation** form that one-on-one counseling was provided on a regular basis. During the initial counseling session, the participant should be informed about possible accommodations, with follow-up counseling sessions conducted on a regular basis to evaluate effectiveness of recommended accommodations (if applicable) and to monitor participant’s progress, perceptions of progress and effectiveness of accommodations (if applicable). Evidence of counseling, services, and effectiveness of accommodations (if applicable) should be recorded on the **Follow-up Documentation** form. If appropriate, the participant should also be directed to other relevant services available in the community and/or through other resources.

**NOTE:** The *Procedural Guide of the Accommodating Adults with Disabilities in Adult Education Programs* (Mellard, Gilbert, & Parker, 1998, Revised 2005) provides an excellent format for helping adult learners identify appropriate accommodations.

**Measure 1.4**

<b>The program demonstrates a commitment to serve a larger percentage of undereducated adults in the community. (10 points)</b>		
	<b>High (10 pts.)</b>	<b>Program increases the number of participants served by ten percent (10%) or greater over the previous fiscal year.</b>
	<b>Medium (5 pts.)</b>	<b>Program increases the number of participants served by five percent (5%) to nine percent (9%) over the previous fiscal year.</b>
	<b>Low (0 pts.)</b>	<b>Program increases the number of participants served by less than five percent (5%) over the previous fiscal year.</b>

- The program is of sufficient intensity and duration so that participants *demonstrate progress* toward their educational goals [AEFLA, Section 231, (e)(4)(A) and (e)(7)].**

**Measure 2.1**

<b>Participants make significant educational/workplace readiness gains. (12 points)</b>		
	<b>High (12 pts.)</b>	<b>65% or more of all participants at Levels 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, and 12 complete an educational functioning level within a program year.</b>
	<b>Medium (6 pts.)</b>	<b>55% to 64% of all participants at Levels 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, and 12 complete an educational functioning level within a program year.</b>
	<b>Low (0 pts.)</b>	<b>Less than 55% of all participants at Levels 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, and 12 complete an educational functioning level within a program year.</b>

**Definition:**

Complete an educational functioning level – as defined by the National Reporting System (NRS) in *Outcome Measures Definitions* and PABLO.

**Measure 2.2**

<b>The program provides workplace readiness instruction, confirmed through standardized assessments, to participants. (6 points)</b>		
	<b>High (up to 6 pts.)</b>	<b>The program provides workplace readiness instruction to 30% or greater of its participants in Levels 2, 3, 4, 5, 6, 9, 10, and 11 using the WES curriculum and following the standardized assessment protocol as outlined in the <i>KBOR CASAS Pre-employment/Work Maturity Checklist Assessment Manual</i>.</b>
	<b>Medium (up to 3 pts.)</b>	<b>The program provides workplace readiness instruction to 20% to 29% of its participants in Levels 2, 3, 4, 5, 6, 9, 10, and 11 using the WES curriculum and following the standardized assessment protocol as outlined in the <i>KBOR CASAS Pre-employment/Work Maturity Checklist Assessment Manual</i>.</b>
	<b>Low (0 pts.)</b>	<b>The program provides workplace readiness instruction to less than 20% of its participants in Levels 2, 3, 4, 5, 6, 9, 10, and 11, or the program does NOT use the WES curriculum and/or does not follow the standardized assessment protocol as outlined in the <i>KBOR CASAS Pre-employment/Work Maturity Checklist Assessment Manual</i>.</b>

**Definition:**

Workplace readiness instruction – Instructor led instruction using the *Workplace Essential Skills* multi-media curriculum.

Standardized assessment – CASAS Pre-Employment/Work Maturity Checklists A, B, C, D, E and F administered following standardized assessment protocol as outlined in the *KBOR CASAS Pre-employment/Work Maturity Checklist Assessment Manual* (July 1, 2005) and three ACT *WorkKeys* assessments—Reading for Information, Applied Mathematics, and Locating Information.

**NOTE:** This measure will be evaluated based on the number of participants reported on PABLO as having completed CASAS Pre-employment/Work Maturity Checklist Pretests A and F AND Checklist Pretests(s) and Posttest(s) B, C, D, and/or E through instruction during the current fiscal year.

**IMPORTANT:** Programs may also provide a list of participants who have received a **Kansas WorkReady!** Certificate. Each participant receiving a **Kansas WorkReady!** Certificate at the following levels will “count” as the following CASAS Pre-Employment/Work Maturity Checklists pre- and post-testers.

- 1 Gold Level WorkReady! Certificate = 10 CASAS workplace readiness completers
- 1 Silver Level WorkReady! Certificate = 8 CASAS workplace readiness completers
- 1 Bronze Level WorkReady! Certificate = 6 CASAS workplace readiness completers

**Measure 2.3**

<b>The program adheres to standardized testing protocol, confirmed by reviewing randomly selected learners' permanent files. (8 points)</b>		
	<b>High (8 pts.)</b>	<b>90% to 100% of learner files examined reveal no testing protocol irregularities.</b>
	<b>Medium (4 pts.)</b>	<b>80% to 89% of learner files examined reveal no testing protocol irregularities.</b>
	<b>Low (0 pts.)</b>	<b>Less than 80% of learner files examined reveal no testing protocol irregularities.</b>

**Examples of testing protocol irregularities:**

Incorrect CASAS diagnostic pre- and/or posttest administered, invalid or unreliable test scores, missing CASAS score(s) and/or answer sheet(s), missing technology checklist(s), missing CASAS Pre-Employment/Work Maturity checklist(s), documentation of technology competency not attached to technology pre/post test(s), documentation of workplace readiness competency not attached to CASAS checklist(s).

**Examples of invalid or unreliable test scores:**

A test score derived from a CASAS assessment that is incorrectly scored; a test score that is above or below the valid test range for a CASAS assessment; a test score that is derived from the same test form administered to the learner previously and within the past six months; a CASAS Functional Writing Assessment picture task score and level determined by only one certified scorer or determined by two or more non-certified scorers.

3. **The program identifies yearly performance goals and documents participant outcomes, and participants remain in the program a *sufficient length of time* so that they are able to achieve outcomes [AEFLA, Section 231(e)(1), (e)(4)(A), and (e)(7)].**

**Measure 3.1**

<b>Participants spend a significant amount of time in instructional activities. (4 points)</b>		
	<b>High (4 pts.)</b>	<b>The <i>median</i> number of participant hours for program participants in Levels 1, 2, 3, 4, 7, 8, 9, 10, 11 and 12 is 60 or more hours.</b>
	<b>Medium (2 pts.)</b>	<b>The <i>median</i> number of participant hours for program participants in Levels 1, 2, 3, 4, 7, 8, 9, 10, 11 and 12 is 50 to 59 hours.</b>
	<b>Low (0 pts.)</b>	<b>The <i>median</i> number of participant hours for program participants in Levels 1, 2, 3, 4, 7, 8, 9, 10, 11 and 12 is less than 50 hours.</b>

**Definition:**

Median number of participant hours – The midpoint (an equal number above and below) in the listing of all participant hours.

**NOTE:** Learners identified as “distance learners” on PABLO and their hours of participation will not be included when determining the median number of participant hours.

**Measure 3.2**

<b>The number of participants with up to four (4) program goals is directly proportionate to the number of participant outcomes (i.e., achieved program goals). (8 points)</b>		
	<b>High (8 pts.)</b>	<b>The total number of outcomes achieved after <i>learners</i> have identified their goals is equal to or greater than the total number of program participants, as measured by PABLO.</b>
	<b>Medium (4 pts.)</b>	<b>The total number of outcomes achieved after <i>learners</i> have identified their goals is 80% to 99% of the total number of participants, as measured by PABLO.</b>
	<b>Low (0 pts.)</b>	<b>The total number of outcomes achieved after <i>learners</i> have identified their goals is less than 80% of the total number of participants, as measured by PABLO.</b>

**Examples:**

Example 1: 100 participants have 175 goals (not all of them chose more than 1 goal). 75 participants achieved 150 outcomes. Total number of outcomes (150) divided by total number of participants (100) equals 1.5, or 150%.

Example 2: 200 participants have 400 goals. 180 participants achieved 175 outcomes. Total number of outcomes (175) divided by total number of participants (200) equals .87, or 87%.

**Note:** Outcomes are defined in the *PABLO Users' Manual*, Appendix 1. All learners must have the goal of "complete an educational level." Learners have the option to choose one, two, or three additional goals.

**Measure 3.3**

<b>Prior to each fiscal year, the program negotiates with KBOR and establishes goals for the number of participants that will be served and the percentages of <i>core</i> outcomes that participants will achieve. (8 points)</b>		
	<b>High (8 pts.)</b>	<b>The program meets or exceeds 80% of its negotiated goals.</b>
	<b>Medium (4 pts.)</b>	<b>The program meets 60 – 79% of its negotiated goals.</b>
	<b>Low (0 pts.)</b>	<b>The program meets less than 60% of its negotiated goals.</b>

**Definitions:**

Core outcomes – Complete an educational functioning level, obtain employment, retain/improve employment, obtain a GED or high school diploma, enter post-secondary education or training program, obtain citizenship skills, and meet family literacy objectives.

**Measure 3.4**

<b>Program sets high expectations for learners, provides ongoing support, counseling and follow up and, in collaboration with postsecondary education partners, creates pathways for learners to enter postsecondary education or training programs. (8 points)</b>		
	<b>High (8 pts.)</b>	<b>Ten percent (10%) or greater of exited participants transition to postsecondary education or training programs.</b>
	<b>Medium (4 pts.)</b>	<b>Five percent (5%) to nine percent (9%) of exited participants transition to postsecondary education or training programs.</b>
	<b>Low (0 pts.)</b>	<b>Less than five percent (5%) of exited participants transition to postsecondary education or training programs.</b>

4. The program design and implementation process for all program sites is based on research and effective educational practice [AEFLA, Section 231 (e)(4)(B) and (e)(5)]. Programs offer flexible, yet intensive, schedules and appropriate support services [AEFLA, Section 231 (e)(10)].

**Measure 4.1**

<b>The program design and implementation process at the program’s main site incorporates the components of the Comprehensive Adult Education Planner (PAM – Mellard and Scanlon, University of Kansas). (4 points)</b>		
	<b>High (4 pts.)</b>	<b>Program design and implementation incorporates all seven components of PAM at the program’s main site.</b>
	<b>Medium (2 pts.)</b>	<b>Program design and implementation incorporates a minimum of six components of PAM at the program’s main site.</b>
	<b>Low (0 pts.)</b>	<b>Program design and implementation incorporates fewer than six components of PAM at the program’s main site.</b>

**Definitions:**

PAM – See *The Adult Education Comprehensive Planner*, Mellard and Scanlon, University of Kansas Center for Research on Learning, Revised 2004.

Components of PAM – Pre-enrollment, orientation, assessment, prescription, instruction, test taking, and transition. (See explanation below.)

Main site –The primary location for program services; the single location where the largest percentage of learners are served.

**Explanation of implementation of PAM components:**

Documentation of full implementation of each PAM component includes the following:

**Pre-enrollment** – Printed basic information about program and program offerings, printed and disseminated schedule of orientations and classes, printed script accessible to all staff members to ensure appropriate responses to telephone or face-to-face inquiries.

**Orientation** – A regularly scheduled group process that lasts a minimum of **six** hours over a minimum of two days and includes the following:

- Delivery of information about and explanation of program’s offerings, objectives, funding sources, policies (both behavior and attendance), services to individuals with disabilities, and goal-setting;
- Gathering of demographic information on potential learners;
- Group/individual activities that contribute to building a “community of learners.”
- Appraisal testing;
- Diagnostic testing (no more than two diagnostic tests on one day—reading, math, listening, and/or writing);
- One-on-one counseling which includes additional sharing and gathering of information on disability status and, if necessary, initial identification of accommodations, test scores and explanations, and continuation of the goal-setting process;
- Determination of appropriate class(es) and attendance schedule; and
- Signing of program/learner agreement.

The orientation must take place in a room that is completely segregated from where instruction is being provided or at a time when only orientation is offered, to prevent disruption of services to current participants. *Orientation* is not synonymous with *enrollment!*

**Assessment** – A process to determine learners’ basic skills in multiple areas. Informal assessments may include instructor-generated tests or “end-of-chapter” tests. Formal assessments include standardized tests that have stringent protocols and comparable forms of pre- and posttests. In Kansas, formal assessments include CASAS Diagnostic Reading, Math, and Listening Tests, CASAS Functional Writing Assessment--Picture Task, CASAS Pre-employment/Work Maturity Checklists, and KBOR Technology Competency Checklists. Programs must have an assessment policy and schedule that is followed by all staff members.

**Prescription** – A one-on-one private session with the learner and teacher to review assessment results and goals, develop or update the learning plan, and update learner permanent records. The initial prescription component activities occur at the end of the orientation/assessment component and within 12 hours of the learner’s entry into the program. Prescription sessions with each learner should also occur after formal assessments (posttests) or at the end of a program session.

**Instruction** – Programs should provide a variety of instructional classes, i.e. content classes, topic classes, learning strategy, and test taking classes. Each class should have a syllabus and lesson plans that reflect course content linked to the assessment.

**Test taking** – Programs must follow the testing protocol in the Kansas Adult Education Assessment Policy (Chapter 11, *Kansas Adult Education Policy Manual*) for the formal CASAS assessments and KBOR checklists, and policies outlined in the *Kansas GED Testing Policy Manual and Reference Guide* for the Official GED Practice Test.

**Transition** – A process that begins in orientation with a discussion of learners’ options once they leave the program. The discussion of options and transition activities (speakers, field trips, etc.) continues throughout the learners’ participation in the program. Programs must have a written transition plan for moving higher-level learners into post-secondary education.

**Measure 4.2**

<b>The program design and implementation process for all program sites incorporates the components of the Comprehensive Adult Education Planner (PAM – Mellard and Scanlon, University of Kansas). (4 points)</b>		
	<b>High (4 pts.)</b>	<b>Program design and implementation incorporates all seven components of PAM at the program’s main site and 100% of outreach (satellite) centers.</b>
	<b>Medium (2 pts.)</b>	<b>Program design and implementation incorporates a minimum of five components of PAM at all program sites.</b>
	<b>Low (0 pts.)</b>	<b>Program design and implementation incorporates fewer than five components of PAM at all program sites.</b>

**Measure 4.3**

<b>Program services, including instructional activities and support services, and scheduling reflect the identified needs of the community. (4 points)</b>		
	<b>High (4 pts.)</b>	<b>Intensive instructional services are offered to participants at all program sites, including any outreach sites, a minimum of 8 or more hours per week.</b>
	<b>Medium (2 pts.)</b>	<b>Intensive instructional services are offered to participants at all program sites, including any outreach sites, 6 to 7 hours per week.</b>
	<b>Low (0 pts.)</b>	<b>Intensive instructional services are offered to participants at all program sites, including any outreach sites, fewer than 6 hours per week.</b>

**Definitions:**

Outreach site – a program site offering adult education program services away from the main center of the program.

Support services – services available during regularly scheduled hours to participants that support retention and learner outcomes, such as counseling, childcare, transportation and computer lab access.

**Explanation of instructional services and hours:**

All **classes** are offered a minimum of 8 hours per week, not a combination of hours, i.e. ABE/GED is offered a minimum of 8 hours a week during the day and/or a minimum of 8 hours a week in the evening, not 8 hours per week during the daytime and only 6 hours per week in the evening. Similarly, Beginning ESL is offered a minimum of 8 hours a week during the day and/or 8 hours a week during the evening, not 4 hours for Beginning ESL on Monday and Wednesday evenings and 4 hours of Intermediate ESL on Tuesday and Thursday evenings.

Classes for different levels of learners must be scheduled, and a published schedule of classes should reflect only actual instructional times—not teacher preparation time or one-on-one counseling times.

**5. Program activities effectively employ advances in technology, including the use of computers [AEFLA, Section 231, (e)(6)].**

**Measure 5.1**

<b>The program has a technology plan and incorporates use of current technology into participant instruction. (2 points)</b>		
	<b>High (2 pts.)</b>	<b>All program sites incorporate using a computer and other multi-media into instructional activities.</b>
	<b>Medium (1 pts.)</b>	<b>75% to 99% of program sites incorporate using a computer and other multi-media into instructional activities.</b>
	<b>Low (0 pts.)</b>	<b>Less than 75% of program sites incorporate using a computer and other multi-media into instructional activities.</b>

**Definition:**

Multi-media – including the use of several media, e.g. DVDs, television, audiotapes.

**Measure 5.2**

<b>The program provides technology-specific instruction, including current computer applications and use of Internet, to participants. (6 points)</b>		
	<b>High (up to 6 pts.)</b>	<b>The program provides technology-specific instruction, including computers and use of Internet, to 75% to 100% of its participants, using the <i>KBOR Technology Competency Lesson Plans</i> and following the <i>KBOR Technology Competency Checklists</i> protocol.</b>
	<b>Medium (up to 3 pts.)</b>	<b>The program provides technology-specific instruction, including computers and use of Internet, to 25% to 74% of its participants, using the <i>KBOR Technology Competency Lesson Plans</i> and following the <i>KBOR Technology Competency Checklists</i> protocol.</b>
	<b>Low (0 pts.)</b>	<b>The program provides technology-specific instruction, including computers and use of Internet, to 0% to 24% of its participants and/or does not use the <i>KBOR Technology Competency Lesson Plans</i> and/or does not follow the <i>KBOR Technology Competency Checklists</i> protocol.</b>

**Definition:**

Technology-specific instruction – instruction to participants in the use of facsimile machines, photocopiers, office telephone systems, computers and computer applications in current common use (i.e., Windows 98 or greater or Mac equivalent) and internet access. (A significant number of computers used by participants during technology instruction must have internet access.)

**NOTE:** This measure will be evaluated based on the number of participants reported on PABLO as completing a technology level during the current fiscal year. The program monitor will evaluate the program’s effectiveness at using the *KBOR Technology Lesson Plans* and the program’s adherence to the *KBOR Technology Competency Checklist* protocol.

- 6. The program receives local financial support and is viewed as a valuable component of the sponsoring institution or non-profit agency\*\*.**

**Measure 6.1**

<b>The program receives local financial support in addition to the minimum required amounts to provide services. (8 points)</b>		
	<b>High (8 pts.)</b>	<b>Host institution or non-profit agency provides a 35% or greater match (in cash) to federal funds.</b>
	<b>Medium (4 pts.)</b>	<b>Host institution or non-profit agency provides at least a 25% but less than a 35% match (in cash) to federal funds.</b>
	<b>Low (0 pts.)</b>	<b>Host institution or non-profit agency provides less than a 25% match (in cash) to federal funds.</b>

**Definitions:**

Cash match – cash used to match federal funds must be local agency funds. The source of cash must be state general funds, local ABE mill levy funds, local donations, or other (non-federal) grants or other funds provided by the hosting institution and must be used **exclusively for AEFLA activities. All of the local cash match must be spent in its entirety in the fiscal year in which it was included in the approved annual budget.** Local matching funds must

not be generated from contracted basic skills services. The cash match will be measured from the approved fiscal year budget and monitored by auditors from KBOR.

**Measure 6.2**

<b>Paid instructional and administrative staff receives compensation comparable to equivalent staff in other programs in the same agency. (2 points)</b>		
	<b>High (2 pts.)</b>	<b>Host institution or agency pays program staff a salary that is equal to or better than staff counterparts' salaries.</b>
	<b>Medium (1 pts.)</b>	<b>Host institution or agency pays program staff a salary that is one percent (1%) to five percent (5%) less than staff counterparts' salaries.</b>
	<b>Low (0 pts.)</b>	<b>Host institution agency pays program staff a salary that is greater than five percent (5%) less than staff counterparts' salaries.</b>

**Definitions:**

Paid instructional and administrative staff – paid staff involved in instructional activities, including instructors, teachers, tutors, paraprofessional classroom aides, counselors, and assessment staff, or in administrative **leadership** roles, such as directors and coordinators. This definition does not include secretarial or support staff not involved in instruction or assessment. It also does not include unpaid volunteers.

- The program demonstrates a commitment to quality service to adult learners and to the professionalism of the field of adult education by having paid staff with appropriate educational backgrounds, with credentials in adult education, and with adequate training [AEFLA, Section 231, (e)(8)].**

**Measure 7.1**

<b>Paid instructional and administrative staff members have appropriate educational backgrounds. (4 points)</b>		
	<b>High (4 pts.)</b>	<b>100% of paid instructional and administrative staff has bachelor's or graduate degrees.</b>
	<b>Medium (2 pts.)</b>	<b>85% to 99% of paid instructional and administrative staff has bachelor's or graduate degrees.</b>
	<b>Low (0 pts.)</b>	<b>Less than 85% of paid instructional and administrative staff has bachelor's or graduate degrees.</b>

**Definitions:**

Paid instructional and administrative staff – all paid staff involved in adult education instructional activities, including instructors, teachers, tutors, paraprofessional classroom aides, counselors, and assessment staff, or in administrative leadership roles, such as directors and coordinators. This definition includes Even Start teachers involved in adult education instructional activities. This definition does not include secretarial or support staff not involved in instruction or assessment. It does not include unpaid volunteers.

**Measure 7.2**

<b>Paid instructional and administrative staff is currently KAEA credentialed. (2 points)</b>		
	<b>High (2 pts.)</b>	<b>100% of paid instructional and administrative staff has current KAEA credentials.</b>
	<b>Medium (1 pts.)</b>	<b>90% to 99% of paid instructional and administrative staff has current KAEA credentials</b>
	<b>Low (0 pts.)</b>	<b>Less than 90% of paid instructional and administrative staff has current KAEA credentials.</b>

**Note:** New staff has six (6) weeks following the initial date of employment to secure the initial KAEA credential. KAEA credentialing must be kept current. The standard for KAEA credentialing of staff does not imply that programs must pay for costs of credentialing.

**Although programs have the option to use local funds, federal and state funds may NOT be used for the costs of credentialing.**

**Measure 7.3**

<b>Professional development provided with federal funds results in the program meeting its program improvement plan objective(s). (6 points)</b>		
	<b>High (6 pts.)</b>	<b>The program meets or exceeds its annual program improvement objective(s).</b>
	<b>Medium (3 pts.)</b>	<b>The program makes positive progress toward meeting its program improvement plan objective(s).</b>
	<b>Low (0 pts.)</b>	<b>The program fails to make positive progress toward meeting its program improvement plan objective(s).</b>

**Definitions:**

Professional development provided with federal funds – professional development activities supported with 8% State Leadership Funds.

Positive progress toward – Program demonstrates improvement from previous fiscal year.

For example, a program's improvement plan (PIP) objective is as follows: Central Kansas Community College Adult Education will increase the overall educational gains percentage from 61% (achieved in FY05 and a projected 63% in FY06) to 65% in FY07. Subsequently, the program achieves 64% in educational gains overall. The improvement is 1% over FY06's performance. While the program did not meet their PIP objective, it did make positive progress toward achieving its objective.

8. The program actively collaborates with multiple partners in the community to expand the services available to adult learners and to prevent duplication of services [AEFLA, Section 231, (e)(9)]. The program actively seeks and responds to input from local stakeholders in planning for local services\*\*.

**Measure 8.1**

<b>The program collaborates with multiple partners to provide quality services to adult learners. (4 points)</b>		
	<b>High (4 pts.)</b>	<b>Program demonstrates collaboration with three (3) or more partners who recognize the value of the program to the community.</b>
	<b>Medium (2 pts.)</b>	<b>Program demonstrates collaboration with two (2) partners who recognize the value of the program to the community.</b>
	<b>Low (0 pts.)</b>	<b>Program demonstrates collaboration with fewer than two (2) partners who recognize the value of the program to the community.</b>

**Explanation of partners who recognize the value of the program:**

Collaborative partners are other agencies or institutions who work closely with the local adult education program to ensure that the limited adult education funding is maximized. These partners demonstrate their recognition of the value of the program to the community by providing additional funds, meeting locations, services, volunteers, etc., that **significantly** impact the quality of services that would not be available to adult learners in the community without this collaboration. In almost all instances, the applicant (sponsoring) agency cannot be a collaborative partner. Examples of “significant” support include funds contributed to the program for programmatic expenses or for individual participants’ expenses, donations of equipment and supplies, provisions of medical or counseling services for participants, sponsoring of events, continuing publicity about program’s offerings and events, etc.

Programs should provide evidence that documents ongoing collaboration on KBOR/Adult Ed/Form-COLLABORATION or similar form.

**Measure 8.2**

<b>The program seeks and responds to input from local stakeholders pertaining to planning for local services. (4 points)</b>		
	<b>High (4 pts.)</b>	<b>Program seeks input and documents evidence of responses to input from a minimum of five (5) different stakeholders each year.</b>
	<b>Medium (2 pts.)</b>	<b>Program seeks input and documents evidence of responses to input from three (3) to four (4) different stakeholders each year.</b>
	<b>Low (0 pts.)</b>	<b>Program seeks input and documents evidence of responses to input from fewer than three (3) different stakeholders each year or has limited documentation of inputs or responses.</b>

**Definitions:**

Seek input from stakeholders – examples of seeking input include advisory council meetings, planning sessions, community surveys, staff surveys, participant evaluations or questionnaires, and focus group sessions.

Documents evidence of responses – examples of documenting evidence of responses include formal and informal notations or reports:

1. Memos or letters of response to staff or to advisory councils stating how their input was incorporated into planning;
2. Advisory council minutes showing program agreement to use input in program services;
3. Summary of survey results and a statement on the use of the results; and
4. Written evidence of policy change based on stakeholder input.

Example 1: Program A holds an advisory council meeting. During the meeting the stakeholders discuss two program needs and make suggestions to A on possible solutions. Program A's director implements two of the suggestions and documents them on her copy of the minutes from the meeting.

Example 2: Program B does a learner survey about class hours. As a result of the survey, B's director expands the evening hours from 6:00 PM to 8:00 PM two nights a week to 5:00 PM to 9:00 PM three nights a week and attaches a copy of the new class schedule to the survey summary.

Example 3: A staff committee in Program C meets and determines that certain local policies need to be changed. Based on recommendations from the staff committee, C changes three policies and acknowledges the work of the committee in the revised policy manual.

Programs should provide evidence that documents stakeholder input and program responses to input on KBOR/Adult Ed/Form-INPUT or similar form.

**9. The program maintains a high-quality information management system to report participant outcomes and monitor program performance [AEFLA, Section 231 (e)(11)].**

**Measure 9.1**

<b>The program monitors progress toward its program improvement objective(s) and negotiated outcomes by having accurate and up-to-date information on participants' demographics, assessments, goals, outcomes, and hours of participation, including appropriate surveying of exited learners with the PSE goal. (4 points)</b>		
<b>High (4 pts.)</b>	<b>Using PABLO, the program enters data regularly and in a timely manner, monitors data for accuracy, and submits the annual report with the number of errors not exceeding five percent (5%) of the total number of participants served during the reported fiscal year.</b>	
<b>Medium (2 pt.)</b>	<b>Using PABLO, the program enters data regularly and in a timely manner, monitors data for accuracy, and submits the annual with the number of errors exceeding five percent (5%) but no more than ten percent (10%) of the total number of participants served during the reported fiscal year.</b>	
<b>Low (0 pts.)</b>	<b>Regarding PABLO, program does not enter data regularly or enters data in an untimely manner or does not monitor data for accuracy and submits the annual report with the number of errors exceeding ten percent (10%) of the total number of participants served during the reported fiscal year.</b>	

**Definitions:**

Enters data regularly and in a timely manner – initial learner demographic data, assessment pretest cores, goals, class(es) and teacher(s) and/or advisor information is entered monthly at a minimum. Quarterly data is finalized no later than six weeks after the last day of the quarter.

Monitors data for accuracy – has identified and consistently uses a checks-and-balance system that includes instructors’ reviews to ensure that PABLO-entered data is complete and accurate.

Errors – entry or lack of entry of information into PABLO that results in data that does not correspond to the information in a learner’s individual permanent file; entry or lack of entry of information into PABLO that does not follow the guidelines provided in the latest PABLO users’ manual and the *Kansas Adult Education Assessment Policy* (Section 11, *Kansas Adult Education Policy Manual*). PABLO *Validate Data* queries are tools designed to assist programs in the identification of errors. However, an error that is not identified by a *Validate Data* query is still an error.

Appropriate surveying of exited learners – follows PSE surveying policy outlined in *PABLO Users’ Manual*.

**Measure 9.2**

<b>The program uses PABLO data to initiate program improvement. (4 points)</b>		
<b>High (4 pts.)</b>	<b>Program uses PABLO data to identify and undertake at least one major program improvement initiative within the current fiscal year that results in a significant measurable program improvement outcome.</b>	
<b>Medium (2 pt.)</b>	<b>Program uses PABLO data to identify and undertake a program improvement initiative within the current fiscal year that results in a measurable program improvement outcome.</b>	
<b>Low (0 pts.)</b>	<b>Program does not use PABLO data to identify, undertake, and monitor efforts of a program improvement initiative within the current fiscal year, or the program improvement initiative has not resulted in a measurable program improvement outcome.</b>	

**Definitions:**

Major program improvement initiative and significant measurable program improvement outcome – a process that when implemented improves the percentage of one core outcome achieved by at least five percentage points or improves the percentage of one core outcome achieved to exceed the state overall average for that outcome, e.g., five percentage point increase in the percentage of level completers, or a five percentage point increase in the percentage of GED completers, or a five percentage point increase in the percentage of exited participants who enter PSE, or an improvement in the number of level completers by only one percent, but this percentage of completion is at least one full percentage point above the overall state average.

Program improvement initiative and measurable program improvement outcome – a process that when implemented improves the percentage of one core outcome achieved by less than five percentage points or improves the subset of a core indicators, e.g., three percentage point increase in the percentage of level completers, or a three percentage point increase in the percentage of GED completers, or a three percentage point increase in the percentage of exited participants who enter PSE, or six percentage points increase in the percentage of Level 5

completers (but this improvement in Level 5 completers did not increase the overall percentage of level completers by at least five percentage points or at least one point above the state overall average).

Program should provide evidence that documents use of PABLO data for identifying program improvement initiatives(s), for monitoring and responding to program improvement efforts, and measuring program improvement results.

**10. The program provides quality and cost-effective adult education services.**

**Measure 10.1**

<b>The program provides quality adult education services at a cost per outcome that is aligned with the state average (mean) cost per outcome.</b>		
	<b>10 points</b>	<b>&gt;\$250.00 less than state average</b>
	<b>8 points</b>	<b>\$201.00--\$250.00 less than state average</b>
	<b>6 points</b>	<b>\$151.00--\$200.00 less than state average</b>
	<b>4 points</b>	<b>\$101.00--\$150.00 less than state average</b>
	<b>2 points</b>	<b>State average--\$100.00 less than state average</b>
	<b>0 points</b>	<b>\$1.00--\$100.00 greater than state average</b>
	<b>-2 points</b>	<b>\$101.00--\$200.00 greater than state average</b>
	<b>-4 points</b>	<b>\$201.00--\$300.00 greater than state average</b>
	<b>-6 points</b>	<b>\$301.00--\$400.00 greater than state average</b>
	<b>-8 points</b>	<b>\$401.00--\$500.00 greater than state average</b>
	<b>-10 points</b>	<b>&gt;\$500.00 greater than state average</b>

### 3. Staff Qualifications and Professional Development Policies

- 3.1 Adult education programs must employ instructional and administrative staff with appropriate backgrounds in compliance with KSA 72-4526 and in response to Measure 7.1 of *Indicators of a Quality Adult Education Program*.

#### Education Statute # 72-4526

#### Chapter 72: SCHOOLS

#### Article 45: ADULT EDUCATION PROGRAMS

**Title: Teacher qualifications; certificate of accomplishment; regulations; participation by nonresidents; authority of teachers and administrators.**

**Text:**

(a) Boards shall employ teachers who have known competence in the subjects taught. School teacher certification requirements shall be applied to adult education teachers only in cases where general education subjects are taught in adult basic education programs for grade school or high school credit.

(b) The board shall issue a certificate of accomplishment to every student completing an adult basic education course, which certifies the subjects studied and the accomplishments made therein. Such certificates shall be issued in accordance with the state plan.

(c) Any board may adopt regulations governing the operation of adult education programs. Any board may authorize persons not residents of the district to participate in adult education programs. The teachers and administrators in such adult education programs shall have the same authority over students as is exercised in regular school instruction.

History: L. 1974, ch. 311, S. 11; July 1.

**Note on section (b):** This section was written in the 1970's and applies to the authority of local school district or community college boards to issue certificates of accomplishment – no such certificates of accomplishment are currently authorized under the Kansas State 4-Year Plan for Adult Education and Family Literacy, but the section was included for historical accuracy.

- 3.2 Program staff must participate in essential workshops and may participate in further professional development opportunities.

### **Essential Professional Development Workshops for Kansas Adult Educators**

CASAS ECS Implementation: Assessment to Instruction  
CASAS Writing Assessment: Part I and Part II  
Accommodating Adults with Disabilities in Adult Education Programs  
The Comprehensive Adult Education Planner (PAM)  
Workplace Essential Skills (for programs entering employability skills into PABLO)  
Using Performance Based Assessments (for programs using KBOR Technology Checklists and/or CASAS ECS Pre-employment/Work Maturity Checklists)  
New Directors' Training (for new program administrators)  
Using Data for Program Improvement  
Content Standards, Part I and Part II

### **Recommended Workshops**

New Teacher Orientation  
The Adult Learner  
Recruitment and Retention: The Challenge of Adult Education Programs  
Goal Setting/Goal Getting: What is Adult Education's Responsibility?  
Lesson Planning  
PABLO Basics

Further professional development opportunities are available through KBOR regional workshops, Kansas Adult Education Association, Missouri Valley Adult Education Association, and other national organizations. Programs must use the required 8% of federal funds for professional development **and other activities** that impact program improvement.

- 3.3 Individuals serving in administrative leadership positions and instructional staff positions that are funded (even partially) through federal, state, or local matching AEFLA funds (including adult education mill levy funds) should have current, active professional development plans. These plans should reflect participation in activities directly linked to the program’s improvement plan.

In compliance with section 12.1 of the *Kansas Four-Year State Plan*, each adult education “program will submit an end-of-the-year report showing the effect of professional development and other State Leadership (8% funding) activities on the provider’s level of performance on core indicators and on the *Indicators of A Quality Adult Education Program*. The report will provide information on improvements relating to the staff, program, and learner outcomes.”

Due: August 1, \_\_\_\_\_

## Adult Education Professional Development Report – FY200\_

Program Name \_\_\_\_\_

A. Program Improvement Plan Objective(s): (from your FY 200\_ Adult Education Grant Application)

B. Did your program successfully meet the objective(s)? Yes \_\_\_\_\_ No \_\_\_\_\_

C. If yes, provide a quantitative summary of major individual and program-wide professional development activities and explain how they contributed to accomplishing your objective. (Attach one additional page if needed)

D. If no, provide a quantitative summary of major individual and program-wide professional development activities accomplished and explain the reasons why these activities were not effective in accomplishing your objective and what you would do differently in the future. (Attach one additional page if needed)

Program Director/Coordinator \_\_\_\_\_

Date \_\_\_\_\_

- 3.4 All instructional and administrative staff should have a minimum of 50 hours of professional development every two years and hold current KAEA credentials (Measure 7.2 *Indicators of a Quality Adult Education Program*).

KAEA is the Kansas Adult Education Association, the professional organization for adult educators in Kansas since the mid-1940's. The KAEA Standards Council, established in 1993, was charged with the responsibility to develop a credentialing system for adult education professionals. The purpose is to document and enhance the professional stature of adult educators by establishing minimum requirements for levels of credentials in the field and to insure ongoing professional development. Applications are accepted throughout the year. Credentials are renewable every two years. Applications may be obtained through local Adult Basic Education centers or by visiting the KAEA website ([www.thekaea.org](http://www.thekaea.org)). Those who should apply for a credential include all those currently employed as adult educators in Kansas, directors, instructors, tutors, community college, U.S.D., community-based, corporate, corrections, family or workplace literacy employees.

- 3.5 Programs may **not** pay fees for KAEA credentialing out of federal or state AEFLA funds but may use local funds to pay fees if their sponsoring agency allows such expenditures.
- 3.6 All instructional and administrative staff members are encouraged to be on the Kansasabe listserv.

KAEA has a listserv for members to share information quickly. A listserv is an e-mail list that is intended for a limited and very specific audience. Only people who subscribe themselves have access to the information. There is no moderator. That means that when a message is posted to the list, the message goes directly to everyone on the list and does not go to an intermediary person to decide whether or not to post the information.

#### HOW TO SUBSCRIBE

Send a blank message to: [join-kansasabe@list.jccc.net](mailto:join-kansasabe@list.jccc.net)

This is case sensitive and must be sent from the address you want

added. NOTE: Do not include signature block, as the listserv will try to interpret each line as a command.

#### HOW TO UNSUBSCRIBE

Send a blank message to: [leave-kansasabe-16711@list.jccc.net](mailto:leave-kansasabe-16711@list.jccc.net)

The address is case sensitive. NOTE: Do not include signature block, as the listserv will try to interpret each line as a command.

#### HOW TO SEND A MESSAGE TO THE LISTSERV

Send an e-mail message to: [kansasabe@list.jccc.net](mailto:kansasabe@list.jccc.net) (as you would send an ordinary e-mail message). The message will go out to all the people who are subscribed to the listserv. Keep in mind that many people will read the message and it is not intended to communicate to just a few individuals. For a useful list of guidelines when communicating on listservs, go to:

[http://www.sherlockat.com/list\\_netiquette.html](http://www.sherlockat.com/list_netiquette.html)

Be sure to send your subscription information from the e-mail account that you regularly use. The listserv automatically uses the email account that was used initially to subscribe.

## 4. Policies on Services to Learners

- 4.1 Adult education *instructional services*, including adult basic education (ABE), English as a Second Language (ESL), GED preparation, Civics Education, workplace preparation, and technology skills, must be accessible at no charge to all adults who qualify. Programs may not use AEFLA funds to generate revenue (tuition or fees) to provide or to offset the costs of any instructional services that are necessary and appropriate activities under this grant. However, programs may charge a reasonable fee for consumable materials (which then become the property of the individual paying the fee), childcare services, transportation services, etc.

To offset the costs of consumable instructional materials and equipment and other supportive services, local programs may establish policies concerning consistent, *reasonable* fees charged to individuals. To avoid creating any barriers to all AEFLA services, local policies concerning reasonable fees for consumables and support services must be consistently set, clearly defined, and published in advance. Programs must also have a plan in place to ensure that fees do not adversely impact the participation of economically disadvantaged adult learners.

All funds generated from fees charged to individuals served with AEFLA funds **must be reinvested exclusively in the adult education program and are not included in the AEFLA budget as local matching funds**. For example, monies derived from a consumable book fee may be used to purchase new books, computer software, or other instructional supplies. Programs must maintain records of all fees collected and report on the annual adult education budget form how the funds were reinvested into the program. Locally-generated funds should be spent in the year they are generated, with local programs making a concerted effort to spend the generated funds on the individual learners who paid the fees.

Adult education programs may use AEFLA funding (federal, state, and local matching) to serve only individuals who qualify for adult education services. An adult education program may elect to serve non-qualifying participants as a service to the sponsoring institution.

However, when services are provided to non-qualifying participants, the adult education program must determine the cost per participant (or the cost per participant hour) of all participants and then determine the cost for services to non-qualifying individual(s). **The sponsoring institution must reimburse the adult education program for the cost of serving the non-qualifying individual(s).** This reimbursement funding should not be considered and reported as local matching funds.

Programs may not use federal, state, nor local mill levy adult education funds to provide or to offset the costs of non-AEFLA activities, although the intent may be to generate funds to invest in the adult education program. Learners who are charged tuition or fees for adult education *instructional services* (see above) may not be served with federal, state, and local matching adult education funds, nor included in the count for AEFLA funding, nor entered into the PABLO database.

4.2 According to the Kansas Four-Year State Plan, the Kansas Board of Regents will award multi-year grants on a competitive basis to eligible providers within Kansas. Grants will enable the eligible providers to develop, implement, and improve adult education and literacy activities, including the following categories:

- Adult education and literacy services, which may include workplace literacy services;
- Family literacy services; and
- English literacy programs, also known as English-as-a-second-language (ESL) services;
- English Literacy and Civics Education services, which includes English-as-a-second-language and citizenship skills, technology skills, and employment skills instruction.

Adult Basic Education (ABE) instruction uses CASAS competencies as the basis for a curriculum that is delivered in real-life settings pertaining to the adult learners' roles as worker, family member, citizen and lifelong learner. Pre-employment skills and computer literacy are two examples of life skills and workforce development skills offered in ABE instruction.

Family literacy programs include four distinct components in line with the Even Start family literacy model: adult education, early childhood or pre-school education, parenting skills, and intergenerational activities (parents and children together). Only family literacy programs that include all four components meet the definition of providing family literacy services.

English literacy (ESL) programs offer instruction in speaking and listening, reading, and writing, in real-life settings pertaining to the adults' roles as worker, family member, citizen and lifelong learner. These programs include instruction in vocational English as a Second Language (VESL). Since Kansas is a member of the CASAS Consortium, CASAS ESL competencies offer a framework for instruction.

English Literacy and Civics Education includes services to adults in need of English language instruction, skills necessary to pass the U.S. Citizenship examination, technology skills, and competencies in governmental, educational and workplace systems.

Adult Secondary Education classes blend CASAS competencies with GED preparation and pre-employment or employment specific subjects chosen by employers, learners or referring agencies. Computer literacy skills are offered as well as a number of other subjects to help prepare the adults for their roles as worker, family member, citizen and lifelong learner.

- 4.3 Program services to non-native speakers of English may be offered in native languages other than English in order to provide emergency or other vital communication, i.e. information presented during orientations. However, the focus of instruction must be on acquisition of skills in the English language, not on native language skills. GED preparation in languages other than English is not permitted with AEFLA funds, but Official GED Test batteries passed in other languages may be counted in meeting performance measures for the outcomes of educational gain for Level 6 learners and receiving the GED for learners at all educational functioning levels.

- 4.4 Programs must follow the guidelines of “Who Qualifies for Adult Education Services” (see Page 5) when deciding on appropriate services to adult learners. Adults must be at least 16 years of age, and 16 and 17-year-olds must have a disclaimer from their school district of current residence (not necessarily the last high school attended) prior to receiving AEFLA services, in compliance with the Compulsory Attendance Act, KSA 72-1111.

## **Who Qualifies for Adult Education Services?**

**In order to qualify for adult education services, one of the following three criteria must be met. Upon enrollment in the adult education program, a qualifying individual:**

- I. Does not have a secondary credential;**
  - A. Does not have a high school diploma; and**
  - B. Has not successfully completed the GED battery of tests and will work on obtaining a *Kansas State High School Diploma* by passing the GED Tests.**

**OR**

- II. Does not have basic reading, writing, or math skills.**
  - A. Scores below 246 on a CASAS Reading Diagnostic Test; or**
  - B. Scores below 246 on a CASAS Math Diagnostic Test; or**
  - C. Scores below 271 on the CASAS Functional Writing Assessment.**

**OR**

- III. Does not have proficiency in the English language necessary to function in the multiple adult roles of citizen, employee, and family member.**
  - A. Scores below 236 on a CASAS Listening Diagnostic Test; or**
  - B. Scores below 236 on a CASAS Reading Diagnostic Test; or**
  - C. Scores below 261 on the CASAS Functional Writing Assessment.**

**Only one of the criteria must be met to qualify for adult education services offered by an adult education program. However, an adult education learner with a high school diploma or a GED diploma must be working primarily in the area of the identified deficiency and, learning gains (via post-testing) will be reported in this area.**

**A learner enrolled in a community college course or vocational/technical school/college program, must meet one of the requirements above and may not be enrolled in a credit or non-credit course in the same area of study as the primary learning activities in the adult education program.**

## Example One

### Situation:

A learner is enrolled in a vocational/technical college Home Health Aide program and is dual enrolled in an adult education program with the goal of obtaining a GED.

### Elements for Consideration to Determine Eligibility:

- 1) Learner is enrolled in a vocational/technical college course focusing on occupational skills.
- 2) Learner qualifies for adult education services because he/she does not have a high school diploma or GED diploma.
- 3) Learner's primary learning activities in the adult education program focus on GED preparation.

### Qualifies as an adult education learner?

Yes. Although the learner is dual enrolled, the focus of the two educational programs does not overlap.

## Example Two

### Elements for Consideration to Determine Eligibility:

A learner is enrolled in Developmental Math at a community college.

The learner participates in an adult education program to receive additional assistance with math.

### Criteria:

- 1) Learner is enrolled in a college math class.
- 2) Learner's CASAS Math score is 234.
- 3) Learner qualifies for adult education services based on CASAS Math Diagnostic Test.
- 4) Learner's primary learning activities are focused on improving math skills.

### Qualifies as an adult education learner?

No. The learner is dual enrolled and the major focus of both programs is improvement in math skills.

### Example Three

**Situation:**

A learner with a high school diploma wants to improve his/her computer/technology skills. The learner scores 234 on the CASAS Math Diagnostic Test. The learner's primary learning activities focus on improving computer/technology skills.

**Elements for Consideration to Determine Eligibility:**

- 1) Learner has a high school diploma.
- 2) Learner scores below 246 on the CASAS Math Diagnostic Test.
- 3) Learner's primary learning activities focus on improving computer/technology skills.

**Qualifies as an adult education learner?**

No. The learner has a high school diploma and his/her major focus is the improvement of computer/technology skills.

### Example Four

**Situation:**

A learner with a high school diploma wants to improve his/her math skills. The learner scores 243 on the CASAS Math Diagnostic Test. The learner's primary learning activities focus on improving math skills.

**Criteria:**

- 1) Learner has a high school diploma.
- 2) Learner scores below 246 on the CASAS Math Diagnostic Test.
- 3) Learner's primary learning activities focus on improving math skills.

**Qualifies as an adult education learner?**

Yes. The learner has a high school diploma and his/her major focus is the improvement of math skills.

**Education Statute # 72-1111**

**Chapter 72: SCHOOLS**

**Article 11: SCHOOL ATTENDANCE, CURRICULUM AND ACCREDITATION**

**Title: Compulsory school attendance; exemptions.**

**Text:** (for the full text of this statute, go online to: <http://www.ksde.org/statutes.html> and key in 72-1111)

(a) Subject to the other provisions of this section, every parent or person acting as parent in the state of Kansas, who has control over or charge of any child who has reached the age of seven years and is under the age of 18 years and has not attained a high school diploma or a general educational development (GED) credential, shall require such child to attend continuously each school year (1) a public school for the duration of the school term provided for in K.S.A. 72-1106, and amendments thereto, or (2) a private, denominational or parochial school taught by a competent instructor for a period of time which is substantially equivalent to the period of time public school is maintained in the school district in which the private, denominational or parochial school is located. [If the] child is 16 or 17 years of age, the parent or person acting as parent, by written consent, or the court, pursuant to a court order, may allow the child to be exempt from the compulsory attendance requirements of this section.

(b) If the child is 16 or 17 years of age, the child shall be exempt from the compulsory attendance requirements of this section if (1) the child is regularly enrolled in a program recognized by the local board of education as an approved alternative educational program, or (2) the child and the parent or person acting as parent attend a final counseling session conducted by the school during which a disclaimer to encourage the child to remain in school or to pursue educational alternatives is presented to and signed by the child and the parent or person acting as parent. The disclaimer shall include information regarding the academic skills that the child has not yet achieved, the difference in future earning power between a high school graduate and a high school drop out, and a listing of educational alternatives that are available for the child.

Note: Deletions of Sections (c)—(f) are intentional.

(g) As used in this section, the terms "parent" and "person acting as parent" have the meanings respectively ascribed thereto in K.S.A. 72-1046, and amendments thereto.

from K.S.A. 72-1046 (d) As used in this section:

(1) "Parent" means and includes natural parents, adoptive parents, stepparents, and foster parents;

(2) "person acting as parent" means (A) a guardian or conservator, or (B) a person, other than a parent, who is liable by law to maintain, care for, or support the child, or who has actual care and control of the child and is contributing the major portion of the cost of support of the child, or who has actual care and control of the child with the written consent of a person who has legal custody of the child, or who has been granted custody of the child by a court of competent jurisdiction...

Simply put, the law requires that anyone who is 16 or 17 years old be enrolled in school – and if they are enrolled in school, they are *not* allowed to enroll in adult education. The law is in effect at all times, including summer when the public schools may be closed. It is the responsibility of the potential adult education learner to get the disclaimer forms completed – *not* that of the adult education program staff. The disclaimer forms and the counseling session need to be from the school district in which the 16- or 17-year-old resides *currently*, regardless if the student attended school there. If the 16- or 17-year-old is on an IEP, (s)he must disenroll from school, and a disclaimer also needs to be completed. If a 16- or 17-year-old is emancipated (by a court order) or is married, (s)he is considered an adult, and (s)he may sign the disclaimer (no parental or guardian’s signature is required). If a school district is reluctant to comply with the law when a learner has not attended its schools or for any other reason, adult education programs are encouraged to refer the school district staff to Mr. Rod Bieker, Kansas State Department of Education legal counsel, at (785) 296-3204 for clarification of the law.

- 4.5 Adults may not be required to show proof of residency in Kansas, nor may programs require adults to show a Social Security card, evidence of citizenship, or evidence of legal permission to reside in the U.S. While programs are encouraged to recruit and serve qualifying adults residing and/or working within Kansas, adults from another state, particularly those residing in communities along the state border, may participate in program services. Newcomers to Kansas from other states do not need to show identification, and programs should not ask potential participants to present a Social Security cards or work permit cards.

**EXCEPTION:** Individuals in the Unites States on nonimmigrant visas are not eligible for services in adult education programs in Kansas. Individuals residing in the United States on nonimmigrant visas include foreign government officials (A-1) and their family members (A-2) and their employees and servants (A-3), visitors for business (B-1) and for pleasure (B-2), aliens in transit (C1-C4), crewmen (D1-D2), academic students (F-1) and their spouses and children (F-2), temporary workers (H1B-2B) and their spouses and children (H-4), and workers with extraordinary abilities (O-1) and

their spouses and children (O-3). For a complete listing of nonimmigrant visas see the U.S. Citizenship and Immigration Services website at

[http://www.uscis.gov/graphics/services/imm\\_visas.htm](http://www.uscis.gov/graphics/services/imm_visas.htm)

While program staff may not request to see visas, if an adult voluntarily disclose his/her nonimmigrant visa status or the program is aware of or becomes aware of a learner's nonimmigrant visa status, the program must inform the learner that he/she is not eligible to receive program services under AEFLA.

ESL students attending post-secondary institutions (and their spouses) are in a unique situation. Before these students can obtain a student visa, the student must guarantee that they have English language skills at a level sufficient to handle the rigors of his/her area of study. The post-secondary institution becomes the student's (and spouse's) "sponsor" and provides an additional guarantee to the U.S. Government, assuring that it will provide the support and instruction necessary for the student to be successful in his/her course of study. The cost for such classes is one of the additional expenses that justifies the "out-of-country" tuitions, which are usually quite significant.

To use adult education funding to serve these students violates the "most-in-need" mandate, since these students' needs for ESL instruction should be addressed and met by the sponsoring institution. If these needs are not being met by the sponsoring institution, the sponsoring institution is not fulfilling the contract it made with the U.S. government. This commitment extends to spouses and other family members since they are essentially on a student visa as well.

In addition to the issue of serving "most-in-need" learners, several adult education programs have noted that attendance of post-secondary students and/or family members in AEFLA-sponsored ESL classes significantly decreases the enrollment of ESL learners who are less educated and frequently of lower economic status. In other words, inclusion of post-secondary students in ESL classes discourages participation by the "hardest-to-serve/most-in-need" populations. **Therefore, post-secondary education students and their family members needing ESL services should not be served with AEFLA state, federal, or matching local funds.**

4.6 Local programs may choose to expand the scope and enhance the quality of services to adult learners by collaborating with other agencies and local business/industry partners. All participants receiving services through collaborative efforts that include any percentage of AEFLA funding (federal, state, or local match) must qualify for adult education services (see section 4.1: *Who Qualifies for Adult Education Services?*). Adults served in classes/programs funded through collaborative efforts that include any percentage of AEFLA funding must be counted as AEFLA participants and their records entered in PABLO databases. All classes/programs/services that are supported with any percentage of AEFLA funding and all individuals served in these programs are included when determining the performance levels of the *Indicators of a Quality Adult Education Program*.

4.6.1 *About contracting with other agencies or federal programs:*

Contracts for adult education services with Department of Corrections (DOC), Department of Social and Rehabilitation Services (SRS), Department of Commerce, or One-Stop operators should be negotiated with the intent to improve support services to learners, to expand the program's hours/location of services, and/or to enhance the quality of adult education services in ways that would not be possible without a collaborative approach. Adult education programs must document how the contracted monies enhance, not supplant, adult education services. All services, all staff members, all program sites, and all participants served through collaborative partnerships that include any percentage of AEFLA funding must be included in the determination of performance levels of the *Indicators of a Quality Adult Education Program*.

Contracts for adult education services with business/industry partners are permitted as long as AEFLA funding is used exclusively to provide allowable AEFLA services. AEFLA funding cannot be used to provide employer-specific training. Onsite workplace literacy programs that are supported with any percentage of AEFLA funding and their participants must be

included in the determination of performance levels of the *Indicators of A Quality Adult Education Program*. Adult education programs may not contract with business/industry partners to provide work-place literacy programs if this collaborative effort results in a reduction of services to the general public. Adult education programs must monitor the effectiveness of their workplace literacy programs in comparison to their adult education programs that serve the general public.

All monies generated by contracts that include services provided by any percentage of AEFLA federal, state, and/or local matching funds must be reinvested exclusively in the adult education program but should not be included in the AEFLA budget as part of the local match. No portion of the local cash match may be generated from AEFLA federal, state, and/or local matching funds. (See Section 4.1.)

Any learner served through contractual services that are paid for exclusively by non-AEFLA funding cannot be included in the adult education learner count on PABLO. The only exceptions to this policy are adults participating in Even Start, Migrant Even Start, Reading Excellence, Title I (ESEA), or 21<sup>st</sup> Century Community Learning Centers grant-funded programs that include the AEFLA-funded adult education program as a collaborative partner. Adult learners served in these programs may have their participation and outcomes reported on PABLO and on the required reporting format of the non-AEFLA program.

Learners served in all other federally funded education programs (such as Title III programs) cannot be simultaneously served in an AEFLA-funded program, and, therefore, they cannot be included in the adult education learner count on PABLO. Adult education programs must be able to clearly define and delineate the services provided by AEFLA funding, the service provider(s) supported by AEFLA funding, and the recipients of services provided by AEFLA funding.

**NOTE:** AEFLA federal administrative funds (not to exceed 5% of total federal allocation), state funds, and local matching funds may be used to meet an adult education program’s responsibilities as a partner in the local one-stop system. However, when determining the adult education program’s contribution to the local one-stop system, adult education’s “fair share” must be based on the *percentage of individuals who qualify for adult education services* who access the services of the one-stop center—not on the entire operating cost of the one-stop center. Kansas Adult Education programs are encouraged to negotiate MOUs with their local workforce boards that allow the adult education programs to provide the services (core and/or intensive) that are closely aligned with adult education’s mission, such as assessing the basic skills levels and/or pre-employment/work maturity skill levels of one-stop participants.

*4.6.2 About assessments services provided for other agencies:*

Programs are welcome to contract with outside agencies to provide assessments such as CASAS or GED Practice Testing for non-participants in AEFLA funded programs. Such contracts should be fully self-sustaining with none of the costs offset by any AEFLA funding (federal, state, or local match).

**Exception:** See **NOTE** in Section 4.6.1.

*4.6.3 About GED Practice Testing:*

The Official GED Practice Tests (OPT) may be administered to any learner of any age, including currently enrolled high school students, as long as the test taker is capable of reading and taking the test. GED practice tests must be administered under standardized testing conditions by a GED testing center. In some instances, a regional GED test examiner may agree to accept OPT scores from a federally and state funded adult education program that has a history of following standardized testing protocol. An adult education program *may* provide this assessment for the general public under a contract with a GED testing center. More information about Official GED Practice Tests, including online sample questions, is available online at: <http://www.steckvaughn.com/c/@Q1665V742m0f6/Pages/ged.html>

Required practice testing for GED testing is not the responsibility of AEFLA-funded programs, although AEFLA-funded programs may negotiate with local GED testing centers to best meet the needs of individuals taking practice tests. The *Kansas GED Testing Manual* states that it is the responsibility of the GED testing center to provide GED practice testing opportunities for GED candidates. One of the reasons the GED testing centers were allowed to charge a \$25.00 fee for official practice testing was to provide GED testing centers with additional monies to cover the cost associated with OPT testing. GED testing centers need to have a cost-effective process for practice testing GED candidates that are not interested in participating in an adult education program.

The *Kansas GED Testing Manual* also allows GED testing centers to accept GED practice test scores from AEFLA programs, but AEFLA programs are only required to provide testing to their own learners. When AEFLA programs provide GED practice testing for AEFLA learners, the practice testing is considered part of the educational process, and the cost is an allowable AEFLA expense. When GED testing centers do practice testing for GED candidates, it is a GED center expense that must be covered by the GED budget. AEFLA funds, federal, state, and/or local adult education mill levy funding or other local funds designated as adult education funds, cannot be used to offset the cost of GED Testing for any individual and GED practice testing for non-AEFLA participants..

Many adult education programs are closely aligned with their sponsoring agencies' GED testing centers, and they may have problems defining the distinct roles of each of these separate entities. In general, one responsibility of the GED testing center is to provide (or contract for the provision of) GED practice testing to all interested parties. One responsibility of the adult education program is to provide GED practice testing for adult education participants. Therefore, it is especially important to emphasize that there are two distinct options for potential GED test takers: (1) sign up for and participate in an adult education program with the goal of studying for and successfully completing the GED Test Battery; or (2) sign up

for a GED practice testing session with the goal of achieving a score sufficient to be able to take the GED Test Battery.

*Local adult education programs should distinguish carefully between the two groups (adult education participants and GED testers) and should not compel adults who do not need adult education services to begin the program.* According to the U.S. Department of Education, adults who do not need adult education services should not be enrolled in the program. It would, therefore, be unethical to enroll an adult who doesn't need the program simply to capture an outcome when the program itself does not need to provide instructional services to that person.

One possible process is to identify potential "testers only" who indicate they have no need for adult education services and allow them to take GED practice tests as required in the *Kansas GED Testing Manual*. Since these individuals have elected to bypass adult education services, they may be charged the \$25.00 fee for GED practice testing. If they pass the GED practice tests, then they should continue on to take the Official GED Test Battery.

On the other hand, if an individual does not pass the GED practice tests and is identified as needing adult education services, program staff should encourage this person to enter the adult education program, participate in the program's group orientation process, CASAS testing, goal setting, and other managed enrollment activities that are required of all program participants. Once the individual begins the orientation process, he/she would receive services as would any other learner entering the program.

## 4.7 Policies on Distance Education

### 4.7.1 *Definitions Related to Distance Education:*

“Distance education” is formal learning where students and instructors are separated by geography, time or both for the majority of the instructional period. Distance learning materials are delivered through a variety of media including, but not limited to, print, audio recording, videotape, broadcasts, computer software, web-based programs and other online technology. Teachers support distance learners through communication via mail, telephone, e-mail, online technology and software.

“Distance learners” are students who receive distance education services, as defined above. For a learner who receive both distance education and traditional classroom instruction during a program year (such as through a blended distance-classroom approach or concurrent enrollment in both types of instruction), the learner must be classified as a “classroom learner” or “distance learner” based on the instructional delivery method that the learner primarily used during the fiscal year. (OVAE, *NRS Guidelines for Distance Education*, June 6, 2006.)

In Kansas AEFLA programs, “distance education” is defined as formal learning where students and instructors are separated by geography, time or both for the majority (greater than 50% of the hours of participation) of the instructional time. Distance learning is delivered to a remote site or to a participant’s home via the Internet (web-based) or on-line computerized program(s). “Distance learners” are those learners who participate initially in an on-site program, then participate through distance learning using a computer with regularly scheduled on-site reviews and progress testing. There is a check box on the PABLO *Student Info* tab to identify each Kansas Adult Education program’s distance learners.

Distance learning does not include all study hours that a learner may undertake. It is expected that most adult education participants will study out of class. Therefore, hours generated

by learners while doing homework and other self-directed learning projects are not counted on PABLO, and these learners are not to be identified as “distance learners.” Only those learners who are working intently on a web-based or an on-line computerized program at a distance from but under the supervision of and with the support of an adult education instructor may be identified as distance learners.

4.7.2 *Measuring Contact Hours for Learners in Distance Education:*

In order for a program to identify a learner as a “distance learner” and to report this learner’s instructional hours generated through distance learning, the following requirements must be met:

- 1) The initial 12 hours of participation must occur on-site through face-to-face (f2f) instruction. This initial 12 hours should include the program orientation, CASAS appraisal testing, CASAS pre-testing, one-on-one counseling with goal identification and determination of distance learning “compatibility,” and assessment of the learner’s technology skills using the Kansas Technology Checklists. **Learners identified as “distance learners” should, at a minimum, pass the Technology Level 3 Checklist with or without instruction.**
- 2) A distance learner must participate a minimum of eight (8) hours per week. The minimum eight hours of participation must be actual clock time confirmed by the computer program (e.g., PLATO) and also documented by the learner.
- 3) In addition to the 32 hours per month of distance learning, a distance learner must participate in f2f instruction a minimum of four (4) hours per month. The four hours of f2f participation may include one-on-one counseling, reviewing of work completed, and, after 60 or more hours of instruction, CASAS posttesting.
- 4) A distance learner must participate a minimum of 36 total hours (distance and f2f learning) per month in order to retain access to the web-based or other computerized instructional program.

- 5) Hours of participation for distance learners should be entered into PABLO, indicating actual f2f hours and distance learning (dl) hours.
- 6) CASAS pretesting and posttesting must be conducted on-site following the guidelines in the Kansas Assessment Policy (Section 11).

A participant is identified as a distance learner by selecting the “distance learner” box on the *Student Info* tab of PABLO. Once a participant is identified as a distance learner, both his/her on-site and computerized distance learning instructional time must be reported on PABLO. Actual instructional time generated by a distance learner through computerized distance learning must be reported on the PABLO *Hours* tab as a class with the class code of “DL.” Actual instructional time generated by a distance learner through on-site instruction must be reported on the PABLO *Hours* tab with a class code of “f2f.” By assigning two different class codes, distance learning and on-site instructional time can be monitored.

## 5. Policies on Research-based Practice

Programs must make every effort to assist adults via methods reflecting research-based, effective practice during orientation and throughout instruction.

### 5.1 Use of the Proficiency Attainment Model (PAM)

Programs are encouraged to follow all seven components of the Proficiency Attainment Model (PAM) described in *The Comprehensive Adult Education Planner* by Daryl Mellard, Ph.D., and David Scanlon, Ph.D., of the University of Kansas. PAM was developed as a result of federally funded research and describes the following seven essential components of adult education in adult education programs:

- The pre-enrollment component;
- The orientation component;
- The assessment component;
- The individual prescription component;
- The instructional and monitoring component;
- The GED test-taking component;
- The transition to community component.

PAM is incorporated in the *Indicators of A Quality Adult Education Program* (see measure 4.1) and is a critical component of program evaluation. AEFLA legislation calls for a “program design and implementation process for all program sites ... based on research and effective educational practice [AEFLA, Section 231 (e)(4)(B) and (e)(5)]. The legislation further requires that “programs offer flexible schedules and support services [AEFLA, Section 231 (e)(10)].”

Components of PAM may be adapted to best suit the local needs of adult learners. For example, in the area of goal setting, learners who set goals during pre-enrollment or orientation may revisit and change those goals in a later component. Or activities from the transition component may actually occur much earlier during orientation or instruction.

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## 6. Funding Policies

- 6.1 A funding formula based on quality and service to learners who are most in need is applied to all successful AEFLA grant applicants according to the Kansas Four-Year State Plan. In order to be included in the funding formula, adult education programs must have an approved grant application (first year of funding) or renewal application (subsequent years of funding) and meet minimum standards required by the state plan and in accordance with KSA 72-4521.

### PURPOSE

The purpose of this formula is to equitably distribute state and federal funds available to those programs whose grant applications have been approved. It is not used to determine whose grant applications are approved, as that would interfere with the direct and equitable access that the state plan establishes and the Adult Education and Family Literacy Act requires. Components of the formula were developed with input from adult education program leadership in Kansas.

The Federal funds distributed by this formula include all Section 231 funds and 8 percent of Section 222 funds. Section 222 funds will be broken out by the funding formula and earmarked for use in professional development and other program improvement activities (see section 6.8).

### GOALS

1. To build into funding decisions the core performance measures and *Indicators of a Quality Adult Education Program*, including participant outcomes, sufficient intensity, instructional staff credentials, and local support.
2. To establish a minimum level of funding so that all adult education programs have an adequate base from which to maintain and enhance quality services.
3. To recognize the difference between urban and rural centers in cost per participant hour to serve those participants at the five lowest levels.

## FORMULA

1. One-half of state funds is divided evenly among all funded programs as a base level of funding, PLUS
2. One-half of federal funds is distributed based on the number of all participant outcomes, with educational functioning level completions achieved by participants at the six lowest levels (i.e., with a CASAS score of 210 or below) multiplied by a factor of 2, PLUS
3. The remaining half of state funds and the remaining half of federal funds are distributed based on the number of points each program receives on the *Indicators of A Quality Adult Education Program* times a quality factor.

### **Example:**

In fiscal year 2008, total federal funds are \$2,906,970, and total state funds are \$1,100,000. Total outcomes for all participants for 33 programs are 8745 (which includes the doubling of lower level educational gains/outcomes). Average number of quality points for 33 programs is 65. Program XYZ has 131 outcomes plus 64 educational gains at the five lowest levels, receives 62 quality points from reviewers. Program XYZ's funding is calculated as follows:

$$\begin{array}{rccccccc} (\frac{1}{2} \text{ state}) & & (\frac{1}{2} \text{ federal}) & & (\frac{1}{2} \text{ federal} + \frac{1}{2} \text{ state}) & & & & \\ (550,000/33) + \{[(1,453,485/ 8745) \times [131 + (64 \times 2)]]\} + \{[(1,453,485 + 550,000)] / [(33)(65) \times 62]\} = & & & & & & & & \\ \$16,667 & + & \$43,048 & + & \$57,910 & = & \$117,625 & & \end{array}$$

Education Statute # 72-4521

**Chapter 72: SCHOOLS**

**Article 45: ADULT EDUCATION PROGRAMS**

**Title: Establishment and operation agreements with state board; approval of applications and programs.**

**Text:**

The state board may enter into agreements with any board for the establishment and operation of adult basic education programs and any board desiring to secure state and federal funds for the cost of conducting the same shall certify and file an application with the state board for the approval of such adult basic education program. The application shall be on a form prescribed and furnished by the state board, shall contain such information as the state board shall require, and shall be filed on or before July 1 of each year. Approval of the application and the program shall be prerequisite to payment of state and federal funds to any board.

History: L. 1974, ch. 311, § 5; L. 1999, ch. 147, § 118; July 1.

## 6.2 KBOR authority for AEFLA administration

KBOR is authorized to administer AEFLA federal and matching state or local funds (according to KSA 71-4517, 72-4518, 72-4519, and 72-4520), as well as local mill levy funds designated for adult education (according to KSA 71-617 and 72-4523). Programs receiving mill levy funds must spend the funds as a match to AEFLA-funded activities, and funds may not necessarily be spent in the same manner as local cash that is not used to match AEFLA funds.

According to relevant educational statutes, funds generated by local mill levy for adult education programs cannot be used to operate a GED Testing Center nor pay the salaries or partial salaries of GED examiners, alternate examiners, or support staff.

### **Education Statute # 72-4518**

#### **Chapter 72: SCHOOLS**

#### **Article 45: ADULT EDUCATION PROGRAMS**

**Title: Acceptance of benefits of federal law; administration and supervision by state board; state plan; agreements with federal agencies authorized.**

**Text:**

(a) The state of Kansas does hereby accept the provisions and benefits of federal law relating to adult basic education programs. The state board is hereby designated as the agency for administration of adult basic education programs and for supervision of the administration of adult basic education programs by boards. The state board is authorized to prepare, from time to time amend, and administer the state plan in accordance with state and federal law.

(b) The state board shall enter into agreements with the United States office of education and other agencies of the federal government for the purpose of participation in adult basic education programs provided for by federal law. Any such agreement may contain provisions required or authorized by federal law, so long as the same are not in conflict with the provisions of this act.

History: L. 1974, ch. 311, § 2; L. 1999, ch. 147, § 117; July 1.

**Education Statute # 72-4519**

**Chapter 72: SCHOOLS**

**Article 45: ADULT EDUCATION PROGRAMS**

**Title: State and federal funds; allocation and distribution; where deposited; payments; rules and regulations.**

**Text:**

(a) The state board shall be responsible for the allocation and distribution of state and federal funds for adult basic education programs in accordance with this act and with the state plan. Such moneys (sic) shall be expended only in accordance with and for the purposes specified in federal or state law or the state plan. Federal funds for adult basic education programs shall be deposited in the state treasury. Payments under this act may be made in installments and in advance or by way of reimbursement, with necessary adjustments on account of overpayments or underpayments. The state board shall approve vouchers for disbursements from moneys (sic) in the state treasury for adult basic education programs, and the director of accounts and reports shall draw his warrants thereon in accordance with law.

(b) The state board may adopt rules and regulations for the administration of this act, and for the distribution of federal and state funds for adult basic education programs so long as the same are not inconsistent with the provisions of this act.

History: L. 1974, ch. 311, S. 3; July 1.

**Education Statute # 72-4520**

**Chapter 72: SCHOOLS**

**Article 45: ADULT EDUCATION PROGRAMS**

**Title: Basic education programs; establishment and operation by local boards; standards and criteria; cooperative agreements.**

**Text:**

Each board is authorized to establish, conduct, maintain and administer an adult basic education program and such program shall meet standards and criteria set by the state board. Cooperative agreements among boards may be entered into for providing in conformity with the purposes of this act, such programs, facilities, equipment and services as may be necessary or desirable. No such cooperative agreement shall be effective until the same has been approved by the state board which approval shall be granted if such agreement complies with the standards and criteria established by the state board.

History: L. 1974, ch. 311, S. 4; July 1.

**Education Statute # 71-617**

**Chapter 71: SCHOOLS - COMMUNITY COLLEGES**

**Article 6: STATE AID AND FISCAL PROVISIONS**

**Title: Adult basic education; tax levy authorized, limitations, protest; fund, sources; expenses.**

**Text:**

(a) The board of trustees of any community college may levy a tax in each year for a period of not to exceed five (5) years of not to exceed one-fourth (1/4) mill on all taxable tangible property within the district to maintain and operate an adult basic education program at a level approved by the state board. In no event shall the tax levy authorized hereunder be at a rate which will produce an amount in excess of fifty thousand dollars (\$50,000).

Such tax levy shall be in addition to all other tax levies authorized or limited by law. Proceeds from such tax levy shall be deposited in the adult education fund of the community college which fund is hereby established. All moneys received by a community college for adult basic education shall be deposited in the adult education fund. The expenses of a community college attributable to adult basic education shall be paid from the adult education fund.

(b) No tax levy shall be made under authority of this section until a resolution authorizing such a levy is passed by the board of trustees and published once a week for three (3) consecutive weeks in a newspaper having general circulation in the community college district, and such resolution shall specify the millage rate of such tax levy and the period of time for which such tax levy shall be made under authority thereof. After the adoption of such resolution such levy may be made unless, within ninety (90) days following the last publication of the resolution, a petition in opposition to such levy, signed by not less than five percent (5%) of the qualified electors of such community college district, is filed with the county election officer of the county in which the main campus of the community college is located. In the event such a petition is filed, such levy shall not be made without the question of levying the same having been submitted to and been approved by a majority of the qualified electors of the district voting at an election which shall be called for that purpose or at the next general election.

History: L. 1974, ch. 311, S. 8; L. 1974, ch. 312, S. 2; L. 1978, ch. 283, S. 1; L. 1979, ch. 223, S. 2; L.1980, ch. 207, S. 45; July 1.

Cross References to Related Sections: Adult education programs, see chapter 72, article 45.

**Education Statute # 72-4523**

**Chapter 72: SCHOOLS**

**Article 45: ADULT EDUCATION PROGRAMS**

**Title: Tax levy authorized; limitations; disposition of proceeds; adult education fund; protest petition.**

**Text:**

(a) Subject to the provisions of subsection (b), the board of any school district may make an annual tax levy for a period of not to exceed five years in an amount not to exceed 1/2 mill upon the assessed taxable tangible property within the school district to maintain and operate an adult basic education program at a level approved by the state board and for the purpose of paying a portion of the principal and interest on bonds issued by cities under authority of K.S.A. 12-1774, and amendments thereto, for the financing of redevelopment projects upon property located within the school district. Proceeds from the tax levy, except for an amount to pay a portion of the principal and interest on bonds issued by cities under authority of K.S.A. 12-1774, and amendments thereto, for the financing of redevelopment projects upon property located within the school district, shall be deposited in the adult education fund of the school district, which fund is hereby established. Notwithstanding any other provision of law, all moneys (sic) received by the school district from whatever source for adult basic education shall be credited to the adult education fund established by this section. The expenses of a school district directly attributable to adult basic education shall be paid from the adult education fund.

(b) No tax levy shall be made under this section until a resolution authorizing the levy is passed by the board and published once a week for three consecutive weeks in a newspaper having general circulation in the school district. The resolution shall specify the millage rate of the tax levy and the period of time for which the tax levy shall be made under authority thereof. After adoption of the resolution, the levy may be made unless, within 90 days following the last publication of the resolution, a petition in opposition to the levy, signed by not less than 5% of the qualified electors of the school district, is filed with the county election officer of the home county of the school district. In the event a petition is filed, the tax shall not be levied without the question of levying the same having been submitted to and approved by a majority of the qualified electors of the school district voting at an election which shall be called for that purpose or at the next general election.

(c) The board of any school district which has made a tax levy authorized under the provisions of this section may initiate procedures to renew its authority to make such a tax levy at any time after the final levy under a current authorization is certified to the county clerk.

History: L. 1974, ch. 311, S. 7; L. 1974, ch. 312, S. 1; L. 1 ch. 52, S. 177; L. 1985, ch. 242, & 1; July 1.

### 6.3 Education statutes concerning use of AEFLA funds

AEFLA funds need to be accounted for separately from general funds (according to KSA 71-614).

#### **Education Statute # 71-614**

#### **Chapter 71: SCHOOLS - COMMUNITY COLLEGES**

#### **Article 6: STATE AID AND FISCAL PROVISIONS**

#### **Title: General fund; transfer authorizations; operating expense; certain expenditures prohibited.**

#### **Text:**

Any lawful transfer of money from the general fund of a community college to the vocational education fund, adult education fund, adult supplementary education fund or motorcycle driver safety fund shall be an operating expense in the year the transfer is made. The board of trustees of any community college may transfer moneys (sic) from its general fund to its vocational education fund, adult education fund, adult supplementary education fund or motorcycle driver safety fund. Expenditures for vocational education, adult basic education, adult supplementary education and motorcycle driver safety shall not be made from the general fund of a community college.

History: L. 1973, ch. 274, S. 19; L. 1974, ch. 311, S. 12; L. 1974, ch. 312, S. 3; L. 1979, ch. 223, S. 1; L. 1980, ch. 207, S. 42; L. 1989, ch. 39, S. 4; July 1.

### 6.4 Budgets and budget reports

All AEFLA programs must submit an annual budget on forms approved by KBOR Adult Education. The budget must detail proposed expenditures for federal and state funding awarded through the funding formula, local cash match and any available mill levy (also see section 6.2 above), and funds generated by adult education services. Programs must send annual budgets with original signatures by mail. The budget must reflect adequate financial management as required in 34CFR80.20 and 34CFR80.37.

During the course of a fiscal year, an annual budget modification is required when the program is awarded additional funds (i.e. EL/Civics Grant funds, incentive funding). These annual budget modifications must be submitted to and approved by KBOR Adult Education. Annual budget revisions that do not result from the receipt of additional funds should reflect changes in line items, but the total funds awarded in federal and state funds, as well as the total cash match, must remain the same.

In addition, twice a year programs are required to submit semi-annual budget reports to KBOR Adult Education on approved budget report forms. These semi-annual budget reports may be faxed or emailed to KBOR Adult Education. Federal or state amounts not spent by June 30 of a fiscal year must either be returned to KBOR or encumbered and spent by September 30 of the following fiscal year. No carryover is permitted from one fiscal year to the next.

Programs need to observe the following maximum or minimum percentages for federal funds:

- maximum 5% of federal funds may be spent on administration (section 100);
- maximum 8% of federal funds may be spent on services to adults in institutions (section 200); and
- minimum and maximum of 8% of federal funds must be spent on professional development (section 400) and/or other program improvement activities.

Maintenance of effort (see section 1.22 (b) as well as Appendix A of the Kansas Four-Year State Plan) of the local match is required so that the level of local support remains consistent or increases. Even if federal funding decreases or if the final total award amount decreases from one fiscal year to the next, the agency supporting the program is required to sustain the level of the local match from the previous year—at a minimum.

Programs are required to submit a Capital Outlay Inventory for each capital outlay item (e.g. equipment, computer software program, or furnishings) costing \$500 or more. A program's Capital Outlay Inventory must correspond to Line 600 on the Adult Education Annual Budget Report. All adult education programs must submit an Capital Outlay Inventory form annually even if no funds were expended in this line item. Programs must submit the Capital Outlay Inventory form for the previous fiscal year no later than the first business day in the month of October.

Budget report forms and the Capital Outlay Inventory form are available at the KBOR Adult Education web site. The Capital Outlay

Inventory form and semi-annual budget reports may be submitted by mail or as an e-mail attachment. However original and revised annual budgets must be submitted by mail with original signatures. Sample forms and instructions are included on pages 12- 15. Following instructions carefully will help prevent delays in approval. A budget revision may be submitted at any time following approval of the budget for a fiscal year. A fiscal year begins on July 1 and ends on June 30.

An annual budget revision is required if a program needs to move funding amounts from one section to another or if changes within the same section line item exceed 10% of the section subtotal. For example, a program has \$1000 budgeted in a section, including \$500 in each of two separate line items. Because of an unanticipated change in the program, one of the line items requires \$800 and the other requires only \$200. Because each line item needs to change by \$300, which is more than 10% of \$1000, a budget revision is necessary. Likewise, if the program needed to move the \$300 to a line item in a different section, a budget revision would be necessary.

A semi-annual budget report accounts for what the program spent in either the first six months (Semi-annual Budget Report I) or the last six months of the fiscal year (Semi-annual Budget Report II). The amounts spent in the first six months plus the amounts in the second six months must add up to the total budgeted amount, but semi-annual expenditures do not need to be exactly half of the budgeted amount. For example, a program budgeted \$1000 on a certain line item and spent \$600 on the line item in the first six months and \$400 on the same line item in the next six months.

Programs are encouraged to first spend local funds then state funds before spending federal funds, *but all funds must be spent as approved in the original budget or a budget revision, including local cash.* Local cash matches must be spent in the fiscal year they are reported on the annual budget report. They cannot be carried over from one fiscal year to the next.

**NOTE:** Original annual budgets and revised annual budgets require an original signature and, therefore, must be submitted by mail or hand delivered to KBOR. The semi-annual budget reports do not

require an original signature and may be submitted as an e-mail attachment.

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<b>A. Adult Education Budget for FY 200__</b>					<b>G. Locally-generated Funds</b>
<b>B. Program Name _____</b>					
	<b>C. Federal Funds</b>	<b>D. State Funds</b>	<b>E. Local Funds</b>	<b>F. Totals</b>	
ENTER TOTAL AMOUNTS APPROVED FOR FY200_:					
<b>100 Administration (maximum 5% of federal funds)</b>					
Administrator Salary				\$ -	
Support Staff Salary/Wages				\$ -	
Other Administrative Costs				\$ -	
<b>SUBTOTAL 100 ADMINISTRATION</b>				\$ -	
<b>200 Instruction</b>					
Instructional Salaries				\$ -	
Instructional Supplies				\$ -	
Other Instructional Costs				\$ -	
<b>SUBTOTAL 200 INSTRUCTION</b>				\$ -	
<b>Amount of SUBTOTAL 200 proposed for correctional or other residential institutions (maximum 8% of federal funds)</b>				\$-	
<b>300 Benefits</b>					
Withholding and Required Benefits				\$ -	
Fringe Benefits				\$ -	
<b>SUBTOTAL 300 BENEFITS</b>				\$ -	
<b>400 Professional Development (min/max 8% of federal funds)</b>					
Personnel				\$ -	
Substitute Costs				\$ -	
College Tuition Reimbursement				\$ -	
Inservice Costs				\$ -	
Professional Development Supplies				\$ -	
Staff Travel				\$ -	
Consultant Travel				\$ -	
Other Professional Development Costs				\$ -	
<b>SUBTOTAL 400 PROFESSIONAL DEVELOPMENT</b>				\$ -	
<b>SUBTOTAL 500 TRANSPORTATION/CHILDCARE</b>					
				\$ -	
<b>600 Capital Outlay</b>					
Instructional Equipment (each item \$500 or over)				\$ -	
Furniture (each item \$500 or over)				\$ -	
Other Capital Outlay (each item \$500 or over)				\$ -	
<b>SUBTOTAL 600 CAPITAL OUTLAY</b>				\$ -	
<b>SUBTOTAL 700 BUILDING AND MAINTENANCE</b>					
				\$ -	
<b>GRAND TOTAL 100 THROUGH 700</b>	\$ -	\$ -	\$	\$ -	
Signatures of Approval:					
Prepared by _____	Date of Submission:				
Program Director _____					
State Director _____					

## Adult Education FY\_\_ Budget Instructions

(This form may also be used for Budget Modifications or Revisions)

### Before beginning, please note the following requirements:

- A maximum of 5% of federal funds may be spent in section 100 (administrative). Program may use available state funds for section 100 as needed.
- A maximum of 8% of federal funds may be spent for institutions (includes activities in residential correctional, medical, mental, youth, or special institutions).
- 8% of federal funds (maximum and minimum) must be spent in section 400 (professional development/program improvement). Program may use available local funds for section 400 as needed.
- Round all amounts to whole dollars using conventional rounding (e.g., \$.00 to \$.49 = \$0 and \$.50 to \$.99 = \$1).

Type the name of your adult education program next to "Program Name."

Indicate in the columns the adult education funds for the current year, including federal funds, state funds, local funds, and total funds (i.e., federal funds plus state funds plus local funds). Use amounts for federal and state funds that have been allocated to your program from the funding formula. Local funds are defined as any cash-matching funds from non-federal, non-state sources, such as a private grant or ABE mill levy. All mill levy funds designated by law for adult education must be used exclusively for adult education services; however, all mill levy funds do not have to be included in the budget in the year collected. Programs must consider maintenance of effort requirements when budgeting local funds. In sections 100 through 700, report actual funds allowed for the year. Any amounts not spent or encumbered by June 30, 200\_, or encumbered amounts not spent by September 30, 200\_, must be returned to Kansas Board of Regents.

In **section 100**, indicate federal, state, local, and total funds for administrator salaries (including director and/or coordinator as applicable) and for any support staff during the period of the budget. Also indicate any other administrative funds, such as consultant services, office supplies, postage, telephone, printing, and other items individually priced under \$500. "Administrative" costs are non-instructional costs of administering the adult education program. Do NOT include any benefits here.

In **section 200**, indicate federal, state, local, and total funds for instructional salaries (any paid teaching staff, whether in an institution or a non-institutional setting, or other instructional staff, such as a counselor), instructional supplies (supplies used to provide instruction to adult education learners), and any other instructional items individually priced under \$500. Do NOT include any benefits here. **Also provide the amount of the section 200 subtotal that was proposed for institutional costs (salaries, supplies, and/or other) as defined above. Since the institutional expenditures are part of the subtotal, do NOT add the amount into the grand total for federal expenditures a second time.**

In **section 300**, indicate withholding and other required benefits, as well as fringe benefits, for any personnel paid with funds allocated in sections 100 or 200.

In **section 400**, indicate amounts for any line items for professional development and/or program improvement activities. Registration amounts should go under "other professional development costs."

In **section 500**, indicate any amounts for providing learners with transportation or childcare.

In **section 600**, indicate any amounts for capital outlay. All items of instructional equipment (such as VCR or computer), furniture (such as a classroom table), or other capital outlay must be individually priced at \$500 or over. If the individual cost per item is \$499 or less, the amount should be indicated in section 100 or 200 instead.

In **section 700**, indicate any amounts proposed for building rent, building maintenance, and other costs of keeping up an adult education facility.

Check that all 7 SUBTOTAL amounts are filled out for each section, in federal, state, local, and total columns.

Add up the 7 SUBTOTAL amounts and indicate them in the "GRAND TOTAL" columns. **Double check your calculations and cross check rows and columns horizontally and vertically. Do not include column G.**

**Column G:** This column should be figured separately from the remainder of the budget. Include in this column all locally generated funds from AE fees or charges to non-AEFLA participants and expenditures. The initial budget report should include carry-over funds from the previous fiscal year. Semi-annual budget reports should include any additional locally generated funds received during FY0\_.

Sign your name at "prepared by" and have the adult education program director sign under your signature. If you are the director, sign **only** on the "program director" line. **Budgets and budget modifications (or revisions) need original signatures; only semi-annual budget reports may be submitted with typed signatures.**



[Code of Federal Regulations]  
[Title 34, Volume 1, Parts 1 to 299]  
[Revised as of July 1, 2000]  
From the U.S. Government Printing Office via GPO Access  
[CITE: **34CFR80.20**]

[Page 196]

## TITLE 34--EDUCATION

### PART 80--UNIFORM ADMINISTRATIVE REQUIREMENTS FOR GRANTS AND COOPERATIVE AGREEMENTS TO STATE AND LOCAL GOVERNMENTS--Table of Contents

#### Subpart C--Post-Award Requirements

#### Sec. 80.20 Standards for financial management systems.

##### Financial Administration

**(a)** A State must expand and account for grant funds in accordance with State laws and procedures for expending and accounting for its own funds. Fiscal control and accounting procedures of the State, as well as its subgrantees and cost-type contractors, must be sufficient to:

(1) Permit preparation of reports required by this part and the statutes authorizing the grant, and

(2) Permit the tracing of funds to a level of expenditures adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of applicable statutes.

**(b)** The financial management systems of other grantees and subgrantees must meet the following standards:

(1) Financial reporting. Accurate, current, and complete disclosure of the financial results of financially assisted activities must be made in accordance with the financial reporting requirements of the grant or subgrant.

(2) Accounting records. Grantees and subgrantees must maintain records which adequately identify the source and application of funds provided for financially-assisted activities. These records must contain information pertaining to grant or subgrant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures, and income.

(3) Internal control. Effective control and accountability must be maintained for all grant and subgrant cash, real and personal property, and other assets. Grantees and subgrantees must adequately safeguard all such property and must assure that it is used solely for authorized

purposes.

(4) Budget control. Actual expenditures or outlays must be compared with budgeted amounts for each grant or subgrant. Financial information must be related to performance or productivity data, including the development of unit cost information whenever appropriate or specifically required in the grant or subgrant agreement. If unit cost data are required, estimates based on available documentation will be accepted whenever possible.

(5) Allowable cost. Applicable OMB cost principles, agency program regulations, and the terms of grant and subgrant agreements will be followed in determining the reasonableness, allowability, and allocability of costs.

(6) Source documentation. Accounting records must be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, contract and subgrant award documents, etc.

(7) Cash management. Procedures for minimizing the time elapsing between the transfer of funds from the U.S. Treasury and disbursement by grantees and subgrantees must be followed whenever advance payment procedures are used. Grantees must establish reasonable procedures to ensure the receipt of reports on subgrantees' cash balances and cash disbursements in sufficient time to enable them to prepare complete and accurate cash transactions reports to the awarding agency. When advances are made by letter-of-credit or electronic transfer of funds methods, the grantee must make drawdowns as close as possible to the time of making disbursements. Grantees must monitor cash drawdowns by their subgrantees to assure that they conform substantially to the same standards of timing and amount as apply to advances to the grantees.

(c) An awarding agency may review the adequacy of the financial management system of any applicant for financial assistance as part of a preaward review or at any time subsequent to award.

(Approved by the Office of Management and Budget under control number 1880-0517)

(Authority: 20 U.S.C. 3474; OMB Circular A-102)

[53 FR 8071 and 8087, Mar. 11, 1988, as amended at 53 FR 49143, Dec. 6, 1988]

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## 7. Policies on Services to Individuals with Disabilities

- 7.1 Local policies on services to adults with disabilities must not discriminate nor violate the Americans with Disabilities Act (ADA). Programs are encouraged to establish and share local policies on minimum qualifications for learners with the ability to benefit from adult education services.

Because programs cannot be discriminatory in any manner in their service to individuals, programs need to ensure that they have made a concerted effort to serve all learners effectively. This effort means the program has appropriate materials for all levels, has posted non-discrimination policies as required under the Americans with Disabilities Act (ADA), is physically accessible, does not impose "unreasonable" time limits, provides appropriate accommodations, etc. This does not mean that programs have to create "new" programs or provide special "exclusive" services for learners.

Some learners would benefit from having one-on-one instruction; however, a program cannot be expected to provide one-on-one instruction for a learner if the program uses a group instruction model. Having a teacher provide one-on-one services would be unreasonable and cost prohibitive. However, if a program provides one-on-one tutoring for some individuals, it would be discriminatory to not provide one-on-one tutoring for any individual who requested such services and who would most likely benefit from such services.

It is also not unreasonable for a program to emphasize--from the first day of a learner's experience with the program--that adult education is an EDUCATION program and participation in the program requires a measurable education or workforce preparation-related goal that is appropriate for the learner AND is pursued by the learner.

Ideally, the program has developed a very consistent process that is used with each and every learner. This process would include the following steps: teachers/learners identify a reasonable goal(s), teachers/learners work toward the goal(s), teachers/learners measure progress toward the goal(s), teachers/learners revise goal(s),

methods, materials, etc. as necessary, teachers/learners monitor progress toward the goal(s), etc. When this process is followed with EVERY learner, the program should have a record that *confirms* that the program is the appropriate placement for the learner or *confirms* that the program is not an appropriate placement for the learner.

If a learner is not making progress because of excessive absences, the program will have a record of the learner's attendance, a record of the counseling session with the learner explaining/reviewing the necessity for consistent attendance and consistent effort in order for the learner to achieve his/her goal(s). With this documentation, it is not unreasonable to "disenroll" a learner when the learner obviously does not (can not or will not) meet the program's *reasonable* expectations leading to goal attainment.

Similarly, a learner with limited ability must also demonstrate progress toward an "appropriate" goal. If the learner cannot/does not/will not demonstrate progress, the program should have a record of the learner's identified goal(s), plan for achieving the goal(s), monitoring of progress toward goal(s), etc. If these elements are in place, and a learner is not making measurable progress toward an appropriate educational goal, then the adult education program is obviously not the appropriate placement (program) for the learner. Even if the learner "is happy in our program," "likes to attend our program," "is developing more appropriate social skills," etc., these are not measurable education/workplace preparation goals and, while they may be appropriate goals for some programs, they are not (absent from any other measurable education and/or workplace preparation-related goals) sufficient reasons for programs to continue to provide services to an individual.

Following these procedures does not mean that programs have to generate excessive additional paperwork. Most programs already have a process for identifying appropriate goals, log of learner attendance/efforts, a learning plan which includes assignments, teacher's comments, learner's reviews of his/her progress, records of teacher/learner joint reviews of progress, etc. Of course, learner handbooks and other orientation materials should state very clearly the expectations of the program--that all learners will identify

and work toward an appropriate education/workforce-readiness goal and that learners will demonstrate ongoing measurable progress toward the goal(s).

For special needs learners--to ensure programs are not being discriminatory--there would not be the same expectation/time frame/etc. as for a learner that did not have special needs. For example, if a learner had a mobility problem and had to depend on public transportation, he/she may not be able to attend the program during inclement weather, so an attendance policy would have to allow for these special circumstances. A learner who has a developmental disability (e.g. mental retardation, Down's syndrome, autism, cerebral palsy) may be able to document a learning gain of five points on the CASAS only after 150 or more hours of instruction instead of the more typical 80-100 hours of instruction. However, if the learner is showing no learning gains--even on teacher-constructed tests, end-of-chapter tests, etc.--and different methods have been tried and proven unsuccessful, then the learner (and perhaps an advocate/aide/parent) needs to be informed that unless measurable progress toward a goal is met by a defined future date, then the learner will no longer be a participant in the program because *obviously* the program is not an appropriate placement for this learner.

When this process is followed, learners have been given due process, programs have not been discriminatory (except to the degree that we cannot be all things to all people), and the program has followed a consistent process that documents that concerted efforts were made to help the learner meet his/her educational/workplace readiness goal(s).

Programs need to emphasize that while learners may have "other" goals, the federal/state monies are tied to very specific goals, and expenditure of these monies to serve learners whose primary reason for attending the program is not aligned with these federal/state goals is an inappropriate expenditure of funds.

How long does the learner need to stay out when "disenrolled"? If a program is not an appropriate placement for the learner now, then it most likely will not be an appropriate placement six months from

now. Of course, for learners who are "disenrolled" because they violated an attendance policy, conduct policy, etc., the program will most likely be an appropriate placement when the learner decides that he/she can adhere to the program's policies. Programs should also have a clearly defined written policy about how long a person will be disenrolled before he/she can apply for readmission and the process for readmission. This does not mean a program "has to" readmit every learner after a certain waiting period. Adult education programs might never readmit a learner that has been a threat to a teacher, another learner, or even to the equipment and materials in a program.

In short, it is extremely important that an adult education program has ample *supporting documentation* to negate any claim of discriminatory actions in its services to adult learners. A "paper trail" of the program's honest, well-planned, diligently-executed efforts to serve all learners will support the program's written policy to disenroll learners when the program determines (based on the documented evidence) that this is not an appropriate placement for the learner and continued service to the learner would be a *misuse* of federal and state funding.

- 7.2 Adults needing accommodations for disabilities should be identified as early in the learning process as possible. Program staff should refer to *The Comprehensive Adult Education Planner (PAM)* and *Accommodating Adults with Disabilities in Adult Education Programs* manuals for further information and procedures. Counseling of adult learners should include referral to the most appropriate placement for the learners needs, regardless of disability status.

In order to "document" a disability, adult education programs should use the Americans with Disabilities Act (ADA) guidelines. Under the ADA broad definitions, program staff can accept several types of documentation of a disability. One of the most common forms of documentation in an educational environment is a self-report from an individual that he/she was identified as having a special need and served under the Individual with Disabilities Education Act (IDEA),

frequently known as "Special Education." Other appropriate evidence includes an individual having an obvious physical disability and/or providing the adult education program with written confirmation of a disability from an appropriate doctor. Program staff should note in the learner's file the type of documentation that was provided.

However, not everyone who says he/she will need accommodations in the learning or testing environment has a disability. Programs should follow up the group enrollment process with one-on-one interviews, especially with the learners who self identify as needing accommodations. This private discussion may provide an environment that is more conducive to soliciting information about why the individual believes he/she will need accommodations to be successful in testing situations. For example, if a learner reports that he received Special Education services in school and that his IEP stated that he should be allowed additional time during testing, this person has a "history of a disability" which is one of the qualifying elements for identification of a disability under ADA. Therefore, this individual would be considered as having a disability for the reporting system.

However, in the private interview setting another learner may report that she will need accommodations because she has dyslexia. When the interviewer questions the learner about her diagnosis, the learner reports that her friend read an article about dyslexia. When the learner and her friend discussed the information provided in the article, they decided that the reason the learner was having trouble reading was because she was dyslexic. The learner also reports she never received Special Education services and that she has never been diagnosed by a professional. While this learner *may* have a specific learning disability, this self-diagnosis and self-reporting of a need for accommodations is not sufficient to identify this person as having a disability.

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## **8. Policies on Environment**

- 8.1 Local policy on behavior and dress code should be posted, and programs should get signatures of adults confirming that they have been appropriately informed about the policies. ADA signs explaining non-discrimination policies should be posted on a wall or bulletin board in plain sight. Discrimination on the basis of age or other demographic designator, such as requiring learners of a certain age group to participate in services for that age group, is not permitted.

According to KSA 72-4526, “(c) Any board may adopt regulations governing the operation of adult education programs. Any board may authorize persons not residents of the district to participate in adult education programs. The teachers and administrators in such adult education programs shall have the same authority over students as is exercised in regular school instruction.”

A sample policy for conduct and dress might include the elements in the following draft. Each local program should have its agency’s legal staff review proposed conduct and dress codes to ensure that the codes are legally defensible and are aligned with the policies of the sponsoring institution.

## <<PROGRAM>> CODE OF CONDUCT

For everyone to be able to learn well, <<PROGRAM>> asks you to please follow these rules:

1. Be aware of the needs of fellow students.
2. Do not disturb others with unnecessary noise, movement, swearing, or other disruptions.
3. Do not abuse physically or verbally, threaten, hit or mistreat any person.
4. Be courteous to and respectful of staff, students and their property.
5. Do not use, sell, possess, distribute or be under the influence of narcotics, drugs, or alcohol.
6. Do not be in possession of any item that could be considered to be a weapon.
7. Do not smoke or chew tobacco while in the building or on school grounds.
8. Do not bring children or other persons into the study rooms.
9. No fund raising, buying, or selling is permitted (such as Avon, Amway, or candy from your child's school).
10. Taking plants or animals into the school requires prior permission from the director.

### << PROGRAM>> DRESS CODE

In <<Program>> learners will always:

- Be clean and odor free.
- Wear shoes.

In <<Program>>, learners will not:

- dress in such a way that others are distracted from studying.
- dress in such a way as to be a danger to themselves or others.
- display immoral, obscene, or indecent messages or pictures.
- display messages or pictures promoting violence, gang activity or drugs (including alcohol and tobacco).

**Failure to follow <<PROGRAM>> Code of Conduct or Dress Code may result in dismissal.**

I have read, or had read to me, and understand this page.

Student Signature \_\_\_\_\_ Date \_\_\_\_\_

Staff Member Signature \_\_\_\_\_ Date \_\_\_\_\_

- 8.2 Local policy on emergency procedures and treatment should be posted, and programs should get signatures of adults confirming that they have been informed about the policies. Programs should offer regular fire and tornado drills and share procedures in case of bomb threats, life-threatening emergencies, or other disasters in a language that learners can read.
- 8.3 Outreach sites, including those that are in close physical proximity to another outreach site, must meet the same requirements of the main program site in reference to performance on measures in the *Indicators of A Quality Adult Education Program*.

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## 9. Policies on Basic Skills Certification

### 9.1 What is the Kansas WORKReady! Certificates?

Kansas WORKREADY! is an initiative that uses WorkKeys, an ACT national assessment system, to create a career readiness certificate documenting an individual's skills in the following areas:

*Applied Mathematics* - measuring the skills people use when they apply mathematical reasoning and problem-solving techniques to work-related problems;

*Locating Information* – measuring the skills people use when they work with workplace graphics, such as charts, graphs, tables, forms, maps, diagrams, and instrument gauges; and

*Reading for Information* – measuring the skills people use when they read and use written text in order to perform duties such as memos, letters, directions, signs, policies, and regulations.

Kansas WORKREADY! Certificates have the following three levels:

**Bronze Level:** An individual achieving this level possesses core skills for approximately 30 percent of the jobs profiled by WorkKeys.

**Silver Level:** An individual achieving this level possesses core skills for approximately 70 percent of the jobs profiled by WorkKeys.

**Gold Level:** An individual achieving this level possesses core skills for approximately 90 percent of the jobs profiled by WorkKeys.

When awarding a certificate, the individual's lowest score on any one test determines the type of certificate awarded.

Gold = must receive a score of 5 or above on **all** three tests

Silver = must receive a score of 4 or above on **all** three tests

Bronze = must receive a score of 3 or above on **all** three tests

(Example: If an individual scores 4 in *Applied Math*, 3 in *Locating Information*, and 5 in *Reading for Information*, a Bronze certificate is awarded.)

9.2 What are the benefits to my adult learners and my program to becoming involved with the Kansas *WORKReady!* Certificate initiative?

The Kansas *WORKReady!* Certificate, signed by Governor Sebelius, is beneficial to students in secondary and post secondary schools who are earning their diploma, degree or other industry certificate. The *WORKReady!* Certificate indicates a student is prepared with basic transferable skills and is equipped to learn job-specific skills.

By becoming a partner with the Kansas Department of Commerce and Kansas Job Link, your program will expand its capacity to educate and prepare a world class workforce for the future that will significantly contribute to economic prosperity for Kansas. Partnerships are necessary for achieving this goal. Since the Kansas Department of Commerce and Kansas Adult Education share common stakeholders—potential and current employees and Kansas businesses/employers—we have the need to communicate effectively using a common voice with these stakeholders. The *WORKReady!* Certificate will provide adult learners with an important tool for securing employment or improved employment, and it will provide employers with a means to identify individuals with basic skills who are ready to learn the specific skills for a job.

Another advantage of this partnership to your adult education program is that by helping your learners obtain *WORKReady!* Certificates, you improve your program’s opportunity for additional funding. Each program participant receiving a **Kansas *WorkReady!* Certificate** will “count” toward Measure 2.2 of the *Kansas Indicators of a Quality Adult Education Program* as follows:

- 1 Gold Level *WorkReady!* Certificate = 10 CASAS workplace readiness completers**
- 1 Silver Level *WorkReady!* Certificate = 8 CASAS workplace readiness completers**
- 1 Bronze Level *WorkReady!* Certificate = 6 CASAS workplace readiness completers**

9.3 What would be my program’s role as a partner in the Kansas *WORKREADY!* Certificate initiative?

As a partner, your program would have the following responsibilities:

1. Administer the WorkKeys tests *Applied Math*, *Reading for Information*, and *Locating Information* in accordance with all ACT, Inc. testing protocol and standards;
2. Department of Commerce will provide approved paper certificates in gold, silver, and bronze, and print candidates name and scores using the standardized state-provided template;
3. Use a standard numbering convention to ensure certificate verification (Example: Allen County CC Adult Education would use 800-1 for the first *WORKREADY!* Certificate it awards.);
4. Secure all *WORKREADY!* Certificate to ensure authenticity and avoid theft and forgery;
5. Assist adult learners in registering on Kansas Job Link so their certificates can be added to the database;
6. Send adult learners names, scores and identifying numbers of those adult learners seeking employment or nearly-ready to seek employment to the local workforce center for inclusion in the secure database;
7. Protect each adult learner's privacy and confidentiality rights by having the adult learner sign a release giving his/her permission to enter his/her personal information into the database;
8. Market the certificate to your respective stakeholders; and
9. Do not discriminate against any individual because of age, race, ancestry, gender, color, religion, national origin, disability, political affiliation or belief.

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## 10. Policies on Program Evaluation and Record Keeping

### 10.1 Monitoring and program evaluation procedures

34CFR80.40 requires KBOR to monitor and report on program performance.

[Code of Federal Regulations]

[Title 34, Volume 1, Parts 1 to 299]

[Revised as of July 1, 2000]

From the U.S. Government Printing Office via GPO Access

[CITE: 34CFR80.40]

[Federal Register Page 212-213]

TITLE 34--EDUCATION

PART 80--UNIFORM ADMINISTRATIVE REQUIREMENTS FOR GRANTS AND COOPERATIVE AGREEMENTS TO STATE AND LOCAL GOVERNMENTS--Table of Contents

Subpart C--Post-Award Requirements

Sec. 80.40 Monitoring and reporting program performance.

(a) Monitoring by grantees. Grantees are responsible for managing the day-to-day operations of grant and subgrant supported activities. Grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function or activity.

(b) Nonconstruction performance reports. The Federal agency may, if it decides that performance information available from subsequent applications contains sufficient information to meet its programmatic needs, require the grantee to submit a performance report only upon expiration or termination of grant support. Unless waived by the Federal agency this report will be due on the same date as the final Financial Status Report.

(1) Grantees shall submit annual performance reports unless the awarding agency requires quarterly or semi-annual reports. However, performance reports will not be required more frequently than quarterly. Annual reports shall be due 90 days after the grant year, quarterly or semi-annual reports shall be due 30 days after the reporting period. The final performance report will be due 90 days after the expiration or termination of grant support. If a justified request is submitted by a

grantee, the Federal agency may extend the due date for any performance report. Additionally, requirements for unnecessary performance reports may be waived by the Federal agency.

(2) Performance reports will contain, for each grant, brief information on the following:

(i) A comparison of actual accomplishments to the objectives established for the period. Where the output of the project can be quantified, a computation of the cost per unit of output may be required if that information will be useful.

(ii) The reasons for slippage if established objectives were not met.

[[ Federal Register, Page 213]]

(iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

(3) Grantees will not be required to submit more than the original and two copies of performance reports.

(4) Grantees will adhere to the standards in this section in prescribing performance reporting requirements for subgrantees.

(c) Construction performance reports. For the most part, on-site technical inspections and certified percentage-of-completion data are relied on heavily by Federal agencies to monitor progress under construction grants and subgrants. The Federal agency will require additional formal performance reports only when considered necessary, and never more frequently than quarterly.

(d) Significant developments. Events may occur between the scheduled performance reporting dates which have significant impact upon the grant or subgrant supported activity. In such cases, the grantee must inform the Federal agency as soon as the following types of conditions become known:

(1) Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation.

(2) Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more beneficial results than originally planned.

(e) Federal agencies may make site visits as warranted by program needs.

(f) Waivers, extensions. (1) Federal agencies may waive any performance report required by this part if not needed.

(2) The grantee may waive any performance report from a subgrantee when not needed. The grantee may extend the due date for any performance report from a subgrantee if the grantee will still be able to meet its performance reporting obligations to the Federal agency.

(Approved by the Office of Management and Budget under control number 1880-0517)

(Authority: 20 U.S.C. 3474; OMB Circular A-102)

[53 FR 8071 and 8087, Mar. 11, 1988, as amended at 53 FR 49143, Dec. 6, 1988]

As stated in the Kansas Four-Year State Plan, “Kansas Board of Regents Adult Education will annually evaluate all adult education and literacy programs receiving funds under the Adult Education and Family Literacy Act, including programs receiving English Literacy and Civics Education funds. “

Three major methods of evaluation are used. The first method of evaluation is the monthly review of each local program’s data for accuracy, to determine trends, to identify areas of concern at an early date, etc. This information is reported on PABLO. (Participant-level data and supporting documentation of data must be kept on file at the local program for a minimum of five years.)

In addition to reviewing each local program’s data, the adult education state staff also analyzes PABLO data on a regular basis to determine if Kansas Adult Education is meeting its performance measures that were negotiated with the U. S. Department of Education. PABLO data is verified at the state level through data matching with other state agencies and through use of telephone follow-up surveys following National Reporting System protocols.

A second form of evaluation involves two reports prepared at the local program level. Each local program must do an annual self evaluation before and in conjunction with the annual monitoring visit. The program’s self-evaluation is based on the monitoring instrument aligned with the *Indicators of A Quality Adult Education Program*.

In addition to the self evaluation, each program must submit a program improvement plan report no later than August 1 with details on its progress toward meeting its program improvement objective that was identified approximately fifteen months earlier. This report

must also include the impact of professional development activities and other state leadership projects on the program's effort to achieve its program improvement objective.

The third method of evaluation is onsite monitoring of adult education programs by an individual with knowledge of WIA and an understanding of the evidence needed to confirm ratings on the measures of the *Indicators of a Quality Adult Education Program*. Data reported on PABLO and the program's self evaluation is the starting point for onsite program evaluations.

During the monitoring visit, the adult education program staff and the monitor will examine the program's PABLO data and compare this data with the documentation collected in learners' "permanent" files. The local program staff and the monitor will also review program processes from recruitment of learners to instructional methods and techniques to collaborative efforts to local support

The monitoring contractor will use the reports generated by PABLO and the evidence presented by the program staff to determine the rating on each measure of the *Indicators*. Monitoring results are reported to KBOR Adult Education.

KBOR Adult Education staff use monitoring results to determine statewide as well as local program technical assistance needs. State level planning for professional development is also heavily dependent on monitoring reports. Monitoring results are also used to determine the "quality factor" in the funding formula.

- 10.2 Local programs must keep program and learner records for a minimum of five (5) years, according to the Kansas Four-Year State Plan and 34CFR80.37.

[Code of Federal Regulations]

[Title 34, Volume 1, Parts 1 to 299]

[Revised as of July 1, 2000]

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PART 80--UNIFORM ADMINISTRATIVE REQUIREMENTS FOR GRANTS AND  
COOPERATIVE AGREEMENTS TO STATE AND LOCAL GOVERNMENTS--Table  
of Contents

Subpart C--Post-Award Requirements

Sec. 80.42 Retention and access requirements for records.

(a) Applicability. (1) This section applies to all financial and programmatic records, supporting documents, statistical records, and other records of grantees or subgrantees which are:

(i) Required to be maintained by the terms of this part, program regulations or the grant agreement, or

(ii) Otherwise reasonably considered as pertinent to program regulations or the grant agreement.

(2) This section does not apply to records maintained by contractors or subcontractors. For a requirement to place a provision concerning records in certain kinds of contracts, see Sec. 80.36(i)(10).

(b) Length of retention period. (1) Except as otherwise provided, records must be retained for three years from the starting date specified in paragraph (c) of this section.

(2) If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the 3-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later.

(3) To avoid duplicate recordkeeping, awarding agencies may make special arrangements with grantees and subgrantees to retain any records which are continuously needed for joint use. The awarding agency will request transfer of records to its custody when it determines that the records possess long-term retention value. When the records are transferred to or maintained by the Federal agency, the 3-year retention requirement is not applicable to the grantee or subgrantee.

(4) A recipient that receives funds under a program subject to 20 U.S.C. 1232f (section 437 of the General Education Provisions Act) shall retain records for a minimum of three years after the starting date specified in paragraph (c) of this section.

(c) Starting date of retention period--(1) General. When grant support is continued or renewed at annual or other intervals, the retention period for the records of each funding period starts on the day the grantee or subgrantee submits to the awarding agency its single or last expenditure report for that period. However, if grant support is continued or renewed quarterly, the retention period for each year's

records starts on the day the grantee submits its expenditure report for the last quarter of the Federal fiscal year. In all other cases, the retention period starts on the day the grantee submits its final expenditure report. If an expenditure report has been waived, the retention period starts on the day the report would have been due.

(2) Real property and equipment records. The retention period for real property and equipment records starts from the date of the disposition or replacement or transfer at the direction of the awarding agency.

(3) Records for income transactions after grant or subgrant support. In some cases grantees must report income after the period of grant support. Where there is such a requirement, the retention period for the records pertaining to the earning of the income starts from the end of the grantee's fiscal year in which the income is earned.

(4) Indirect cost rate proposals, cost allocations plans, etc. This paragraph applies to the following types of documents, and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).

(i) If submitted for negotiation. If the proposal, plan, or other computation is required to be submitted to the Federal Government (or to the grantee) to form the basis for negotiation of the rate, then the 3-year retention period for its supporting records starts from the date of such submission.

(ii) If not submitted for negotiation. If the proposal, plan, or other computation is not required to be submitted to the Federal Government (or to the grantee) for negotiation purposes, then the 3-year retention period for the proposal plan, or computation and its supporting records starts from end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.

(d) Substitution of microfilm. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

(e) Access to records--(1) Records of grantees and subgrantees. The awarding agency and the Comptroller General of the United States, or any of their authorized representatives, shall have the right of access to any pertinent books, documents, papers, or other records of grantees and subgrantees which are pertinent to the grant, in order to make audits, examinations, excerpts, and transcripts.

(2) Expiration of right of access. The rights of access in this section must not be limited to the required retention period but shall last as long as the records are retained.

(f) Restrictions on public access. The Federal Freedom of Information Act (5 U.S.C. 552) does not apply to records unless required by Federal, State, or local law, grantees and subgrantees are not required to permit public access to their records.

(Approved by the Office of Management and Budget under control number 1880-0517)

(Authority: 20 U.S.C. 3474; OMB Circular A-102)

[53 FR 8071 and 8087, Mar. 11, 1988, as amended at 53 FR 8072, Mar. 11, 1988; 53 FR 49143, Dec. 6, 1988; 64 FR 50392, Sept. 16, 1999]

Programs must keep administrative (or office) records for each adult learner separately from any classroom records. All educational records must be stored and released in compliance with the Family Educational Rights and Privacy Act (FERPA). Administrative records include:

- enrollment forms,
- evidence of testing and answer sheets,
- FERPA and other releases,
- attendance records,
- disclaimers (if any),
- requests for release of information to/from another agency or individual (if any),
- and information on disability status and appropriate accommodations recommended and provided (if applicable).

Administrative records should not include homework, incomplete learner projects, or other items not associated with assessment.

Original documentation of disabilities should be kept separately from the classroom record or returned to the learner after noting the diagnosis and recommended accommodations in the classroom record. In case of a valid reason to keep a copy of the documentation of disabilities, the documentation needs to be kept separately from other learner records or returned to the learner when no longer needed.

**No part of a learner's educational record may be released to any outside agency or individual without the written consent of the learner or learner's parent or guardian if the learner is under the age of eighteen.** The consent must state the reason for the release of information and its purpose and have an expiration date. Although programs may NEVER share information with an external agency or

individual without the learner's (or parent's or guardian's) written consent, programs are still required to keep a record for each individual of all information that was shared, with whom information was shared, and when information was shared with any external agency or individual.

**NOTE:** For additional guidance on privacy issues, refer to the Family Educational Rights and Privacy Act (FERPA) at <http://www.ed.gov/policy/gen/guid/fpc/ferpa/index.html>.

A sample consent form is available in the *Accommodating Adults with Disabilities in Adult Education Programs, Revised 2005*, notebook.

[January 18, 2001]

PROGRAM MEMORANDUM - OVAE - FY 2001 - 2

TO: Chief State School Officers  
State Directors of Vocational - Technical Education  
State Directors of Adult Education  
State Directors of Community, Technical and Junior Colleges

FROM: Patricia W. McNeil

SUBJECT: The Family Educational Rights and Privacy Act and the Use of State Unemployment Insurance Wage Records to Report on Performance under the Carl D. Perkins Vocational and Technical Education Act and the Adult Education and Family Literacy Act

The Carl D. Perkins Vocational and Technical Education Act (P.L.105-332) (20 U.S.C. § 2301 et seq.) (Perkins III) and the Adult Education and Family Literacy Act (Title II of the Workforce Investment Act of 1998, P.L. 105-220) (20 U.S.C. § 2901 et seq.) (AEFLA) hold States accountable for reporting on, and achieving, annual performance goals for the placement and retention of students in employment, as well as a number of other student outcomes. In addition, some States have established comparable accountability requirements for State community college systems. There is growing interest among States in using State unemployment insurance (UI) wage records to determine the employment status of former students in order to fulfill these requirements. Generally, State UI wage records can provide more accurate information than mail or telephone surveys of former students.

Moreover, using State UI records is less expensive than mail or telephone surveys.

The Department supports your efforts to improve the accuracy of the information that your State collects concerning student outcomes and to reduce the burden of obtaining this information. However, preserving student privacy is also required by law. As you investigate using State UI wage records to determine the employment status of students, please note that this approach requires the use of personally identifiable information from student education records. Such personally identifiable information is protected by the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g). The purpose of this memorandum is to assist you in understanding FERPA's privacy protections and how to use State UI wage records to determine the employment status of former students in accordance with FERPA. This guidance applies solely to Perkins III and AEFLA. It was developed in consultation with the Undersecretary and the Family Policy Compliance Office, which administers FERPA.

### **Accountability Requirements Established by Perkins III and AEFLA**

Perkins III creates a State performance accountability system for vocational and technical education through which the Secretary and each eligible agency reach agreement on annual levels of performance for a number of "core indicators" specified in the law. Student "placement in, retention, and completion of, postsecondary education or advanced training, placement in military service, or placement or retention in employment" is one of these core indicators (section 113(b)(2)(iii)). Each eligible agency must use the State adjusted levels of performance to evaluate annually the activities of eligible recipients (section 123(b)). Section 113(c) of Perkins III also requires each eligible agency to submit annually a report to the Secretary regarding "the progress of the State in achieving the State adjusted levels of performance on the core indicators of performance."

AEFLA establishes a similar performance accountability system for adult education and literacy activities. The Secretary and each eligible agency reach agreement on annual levels of performance for a number of "core indicators" specified in the law, including "placement in, retention in, or completion of postsecondary education, training, unsubsidized employment or career advancement" (section 212(b)(2)(ii) of WIA). Each eligible agency must evaluate annually the effectiveness of local adult education and literacy activities using the core indicators of performance (section 224(b)(3)). States must report annually to the Secretary on "the progress of the eligible agency in achieving eligible agency performance measures, including information on the levels of performance achieved by the eligible agency with respect to the core indicators of performance" (section 212(c)). To fulfill these evaluation and reporting requirements, a number of States

have expressed interest in using State UI wage records to determine the employment status of former students. Maintained by State labor or employment security agencies, these records consist of quarterly reports of employee earnings that are submitted by employers who are required to comply with the State's unemployment compensation law. In most cases, a wage record includes at least three data elements: (1) an employee's social security number (SSN); (2) the total amount of reportable earnings paid to the employee during the quarter; and (3) the employer's unique identifier. Although Federal and State law protects the confidentiality of this information, most States have established procedures to enable other public agencies to access the information for evaluation purposes.

The employment status of a former student can only be determined from UI wage records by using the student's SSN. A student's SSN, however, is personally identifiable information that is protected by FERPA.

### **Family Educational and Privacy Rights Act**

As you know, FERPA is a Federal law that protects an eligible student's privacy interest in his or her "education records." In particular, FERPA affords eligible students the right to inspect and review their education records, the right to seek to have the records amended, and the right to have some control over the disclosure of information from the records. The term "education records" is broadly defined as:

"[T]hose records, files, documents, and other materials, which (i) contain information directly related to a student; and (ii) are maintained by an educational agency or institution or by a person acting for such agency or institution." (20 U.S.C. § 1232g(a)(4). See also 34 CFR § 99.3 "Education records.")

FERPA provides that education records, or personally identifiable information from such records, may be disclosed by educational agencies and institutions only after an eligible student provides prior written consent, except in statutorily specified circumstances. (20 U.S.C. § 1232g(b)(1) and (d). See also 34 CFR § 99.30.) "Personally identifiable information" is defined by 34 CFR § 99.3 as information that "includes but is not limited to:

- (a) the student's name;
- (b) the name of the student's parent or other family member;
- (c) the address of the student or the student's family;
- (d) a personal identifier, such as the student's social security number or student number;
- (e) a list of personal characteristics that would make the student's identity easily traceable; or

(f) other information that would make the student's identity easily traceable."

Because the vocational and adult education laws include identical provisions stipulating that "nothing in this Act shall be construed to supersede the privacy protections afforded students and parents under" FERPA (section 5 of Perkins III, section 504(a) of WIA), States must comply with FERPA in using State UI wage records.

Generally, there are three options available to State educational authorities for using State UI wage records consistent with the requirements of FERPA:

- \* "Importing" State UI wage records and using them internally to determine the employment status of former students;
- \* Obtaining the prior consent of eligible students to disclose their SSNs to the State UI agency (or other agency that has access to State UI wage records) in order to determine whether they secured or retained employment after they exited the program; and
- \* Authorizing the State UI agency (or other State agency that has access to UI records) to obtain student SSNs directly from local education agencies and educational institutions, determine the employment status of these students, and report the aggregate results, after which students' personally-identifiable information would be destroyed by the agency authorized to match the UI data.

### **"Importing" State UI Wage Records to Determine Employment Outcomes**

A State educational authority may obtain State UI wage record data from the State UI agency and then use this information internally to determine the employment status of students. This approach meets the requirements of FERPA because the State educational authority has not disclosed personally identifiable information from an education record to others. State law, however, may restrict the extent to which you may share personally identifiable information derived from wage records with local education agencies and educational institutions. Providing local education agencies and educational institutions with information about the earnings of individual students, for example, may be prohibited by Federal or State law.

### **Obtaining Student Consent for Disclosures to the State UI Agency**

FERPA permits the disclosure of protected student information if a student has consented in advance to this disclosure in writing. Thus, a State educational authority may disclose student SSNs to the State UI agency (or other agency that has access to State UI wage records) for the purpose of

determining their employment status if it has secured the consent of these students for the disclosure. Requesting student consent for this disclosure, for example, may be made a regular part of the intake or admission process for vocational and adult education programs.

This written consent must be signed and dated by the eligible student and:

- (1) specify the records that may be disclosed;
- (2) state the purpose of the disclosure; and
- (3) identify the party or class of parties to whom the disclosure may be made." (34 CFR § 99.30(b))

In addition, the State educational authority or local educational agency or institution must provide the student, upon his or her request, a copy of the records that are disclosed. (34 CFR § 99.30(c)(1)). A sample consent form that you may adapt is included in Appendix A.

### **Authorizing a State UI Agency to Evaluate Employment Outcomes under Perkins III and AEFLA**

FERPA permits the disclosure of protected student information without the prior consent of students in certain, limited circumstances. (20 U.S.C. § 1232g(b); 34 CFR § 99.31). One exception permits the disclosure of information derived from education records without prior consent to "authorized representatives of" the Comptroller General of the United States, the Secretary, the Attorney General or "State or local educational authorities." The disclosure must be "in connection with the audit and evaluation of Federally-supported education programs, or in connection with the enforcement of the Federal legal requirements which relate to such programs."

Thus, a State educational authority may authorize the State UI agency (or other agency that has access to State UI wage records) to be its representative for the purpose of evaluating whether local vocational and adult education programs have achieved the student employment goals established by the State under Perkins III or AEFLA. Typically, this authorization will be executed by a Memorandum of Agreement (MOA) between the two agencies. The MOA must contain, at a minimum, the following provisions required by FERPA:

- 1.) Information disclosed by a school to an authorized representative must not be redisclosed to a third party in personally identifiable form. The information only may be redisclosed in aggregate, non-personally identifiable form.

2.) The information should be destroyed when no longer needed for the purpose of the disclosure.

3.) The authorized representative may have access to the records in connection only with -

\* an audit or evaluation of a Federally supported education program;  
or

\* for the enforcement of or compliance with Federal legal requirements that relate to those programs.

See 20 U.S.C. § 1232g(b)(3); 34 CFR § 99.35. Sample Memoranda of Agreement are included as Appendix B.

Pursuant to the MOA, the State UI or other agency may then obtain student SSNs directly from local educational agencies or educational institutions and determine the employment status of these students. It may also report the aggregate results of its evaluation to the State educational authority, but no personally identifiable information may be redisclosed in this report. FERPA also requires that each eligible recipient that discloses a student's SSN or other personally identifiable information must maintain a record of this disclosure with the education records of the student. (34 CFR § 99.32)

FERPA also allows a State UI agency to obtain a student's SSN directly from the State educational authority in order to determine the student's employment status. For the purposes of complying with the reporting requirements of Perkins III and AEFLA, a State educational authority may disclose a student SSN to the State UI agency if the UI agency has been made an "agent" of the State educational authority through a written MOA. This MOA should contain the same provisions discussed above.

We hope this memorandum is helpful to you in identifying how State UI wage records may be used to determine the employment status of students in a way that complies with FERPA. State laws concerning the privacy of student records and UI wage information also should be reviewed carefully as you consider the options available to you. If you have further questions regarding the requirements of Perkins III and AEFLA, you may contact Mr. Braden Goetz at (202) 205-3373 or Mr. Jon Weintraub at (202) 205-5602. Please direct any further questions you may have concerning FERPA to:

Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202-4605

(202) 260-3887 (Telephone)  
(202) 260 -9001 (Fax)

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[Federal Register, Page 293]

## TITLE 34--EDUCATION

### PART 99--FAMILY EDUCATIONAL RIGHTS AND PRIVACY--Table of Contents

#### Subpart A--General

##### Sec. 99.5 What are the rights of students?

(a) When a student becomes an eligible student, the rights accorded to, and consent required of, parents under this part transfer from the parents to the student.

(b) The Act and this part do not prevent educational agencies or institutions from giving students rights in addition to those given to parents.

(c) If an individual is or has been in attendance at one component of an educational agency or institution, that attendance does not give the individual rights as a student in other components of the agency or institution to which the individual has applied for admission, but has never been in attendance.

(Authority: 20 U.S.C. 1232g(d))

[53 FR 11943, Apr. 11, 1988, as amended at 58 FR 3188, Jan. 7, 1993]

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[Federal Register, Page 293]

## TITLE 34--EDUCATION

### PART 99--FAMILY EDUCATIONAL RIGHTS AND PRIVACY--Table of Contents

## Subpart A--General

Sec. 99.7 What must an educational agency or institution include in its annual notification?

(a)(1) Each educational agency or institution shall annually notify parents of students currently in attendance, or eligible students currently in attendance, of their rights under the Act and this part.

(2) The notice must inform parents or eligible students that they have the right to--

(i) Inspect and review the student's education records;

(ii) Seek amendment of the student's education records that the parent or eligible student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights;

(iii) Consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that the Act and Sec. 99.31 authorize disclosure without consent; and

(iv) File with the Department a complaint under Secs. 99.63 and 99.64 concerning alleged failures by the educational agency or institution to comply with the requirements of the Act and this part.

(3) The notice must include all of the following:

(i) The procedure for exercising the right to inspect and review education records.

(ii) The procedure for requesting amendment of records under Sec. 99.20.

(iii) If the educational agency or institution has a policy of disclosing education records under Sec. 99.31(a)(1), a specification of criteria for determining who constitutes a school official and what constitutes a legitimate educational interest.

(b) An educational agency or institution may provide this notice by any means that are reasonably likely to inform the parents or eligible students of their rights.

(1) An educational agency or institution shall effectively notify parents or eligible students who are disabled.

(2) An agency or institution of elementary or secondary education shall effectively notify parents who have a primary or home language other than English.

(Approved by the Office of Management and Budget under control number 1880-0508)

(Authority: 20 U.S.C. 1232g (e) and (f))

[61 FR 59295, Nov. 21, 1996]

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[Federal Register, Page 297]

## TITLE 34--EDUCATION

### PART 99--FAMILY EDUCATIONAL RIGHTS AND PRIVACY--Table of Contents

#### Subpart D--May an Educational Agency or Institution Disclose Personally Identifiable Information From Education Records?

Sec. 99.30 Under what conditions is prior consent required to disclose information?

(a) The parent or eligible student shall provide a signed and dated written consent before an educational agency or institution discloses personally identifiable information from the student's education records, except as provided in Sec. 99.31.

(b) The written consent must:

- (1) Specify the records that may be disclosed;
- (2) State the purpose of the disclosure; and
- (3) Identify the party or class of parties to whom the disclosure may be made.

(c) When a disclosure is made under paragraph (a) of this section:

- (1) If a parent or eligible student so requests, the educational agency or institution shall provide him or her with a copy of the records disclosed; and
- (2) If the parent of a student who is not an eligible student so requests, the agency or institution shall provide the student with a copy of the records disclosed.

(Authority: 20 U.S.C. 1232g (b)(1) and (b)(2)(A))

[53 FR 11943, Apr. 11, 1988, as amended at 58 FR 3189, Jan. 7, 1993]

[Code of Federal Regulations]  
[Title 34, Volume 1, Parts 1 to 299]  
[Revised as of July 1, 2000]  
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[Federal Register, Page 298-299]

## TITLE 34--EDUCATION

### PART 99--FAMILY EDUCATIONAL RIGHTS AND PRIVACY--Table of Contents

#### Subpart D--May an Educational Agency or Institution Disclose Personally Identifiable Information From Education Records?

##### Sec. 99.32 What recordkeeping requirements exist concerning requests and disclosures?

(a)(1) An educational agency or institution shall maintain a record of each

[[Federal Register, Page 299]]

request for access to and each disclosure of personally identifiable information from the education records of each student.

(2) The agency or institution shall maintain the record with the education records of the student as long as the records are maintained.

(3) For each request or disclosure the record must include:

(i) The parties who have requested or received personally identifiable information from the education records; and

(ii) The legitimate interests the parties had in requesting or obtaining the information.

(b) If an educational agency or institution discloses personally identifiable information from an education record with the understanding authorized under Sec. 99.33(b), the record of the disclosure required under this section must include:

(1) The names of the additional parties to which the receiving party may disclose the information on behalf of the educational agency or institution; and

(2) The legitimate interests under Sec. 99.31 which each of the additional parties has in requesting or obtaining the information.

(c) The following parties may inspect the record relating to each student:

(1) The parent or eligible student.

(2) The school official or his or her assistants who are responsible for the custody of the records.

(3) Those parties authorized in Sec. 99.31(a) (1) and (3) for the purposes of auditing the recordkeeping procedures of the educational agency or institution.

(d) Paragraph (a) of this section does not apply if the request was from, or the disclosure was to:

(1) The parent or eligible student;

(2) A school official under Sec. 99.31(a)(1);

(3) A party with written consent from the parent or eligible student;

(4) A party seeking directory information; or

(5) A party seeking or receiving the records as directed by a Federal grand jury or other law enforcement subpoena and the issuing court or other issuing agency has ordered that the existence or the contents of the subpoena or the information furnished in response to the subpoena not be disclosed.

(Approved by the Office of Management and Budget under control number 1880-0508)

(Authority: 20 U.S.C. 1232g(b)(1) and (b)(4)(A))

[53 FR 11943, Apr. 11, 1988, as amended at 61 FR 59297, Nov. 21, 1996]

[Code of Federal Regulations]

[Title 34, Volume 1, Parts 1 to 299]

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[Federal Register, Page 300]

## TITLE 34--EDUCATION

### PART 99--FAMILY EDUCATIONAL RIGHTS AND PRIVACY--Table of Contents

#### Subpart D--May an Educational Agency or Institution Disclose Personally Identifiable Information From Education Records?

Sec. 99.35 What conditions apply to disclosure of information for Federal or State program purposes?

(a) The officials listed in Sec. 99.31(a)(3) may have access to education records in connection with an audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements which relate to those programs.

(b) Information that is collected under paragraph (a) of this section must:

(1) Be protected in a manner that does not permit personal identification of individuals by anyone except the officials referred to in paragraph (a) of this section; and

(2) Be destroyed when no longer needed for the purposes listed in paragraph (a) of this section.

- (c) Paragraph (b) of this section does not apply if:
- (1) The parent or eligible student has given written consent for the disclosure under Sec. 99.30; or
  - (2) The collection of personally identifiable information is specifically authorized by Federal law.

(Authority: 20 U.S.C. 1232g(b)(3))

**PERMISSION TO RELEASE INFORMATION for KU RESEARCH**

I, a learner age 18 years or older, \_\_\_\_\_, consent  
(PRINT first and last name)

to the release of the following information: my most recent CASAS diagnostic test scores and any other progress measures used by the Adult Education program, my age, gender, contact information (including a phone number), ethnic group, and location of attendance. The purpose of this release is to see if I may be eligible for an adult literacy research study with the Center for Research on Learning at the University of Kansas and if so, to give information so I may be directly contacted. The study's goal is to improve instruction in literacy in adult education programs.

This information will be given only to the research staff at the Center for Research on Learning. This information will not be given to others and will be destroyed as soon as all the needed information for the study has been collected.

Please ask your adult education director or call the project manager at 785-864-2591 if you have any questions. Thank you for your participation.

\_\_\_\_\_  
Signature of Adult Learner

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name of Adult Education Program

\_\_\_\_\_  
City

**IF participant is under the age of 18:**

I agree to allow \_\_\_\_\_ information to be released.  
(PRINT student's name)

Signature of parent or legal guardian: \_\_\_\_\_

Date: \_\_\_\_\_

## **11. Kansas Adult Education Assessment Policies and Procedures**

The Workforce Investment Act (WIA), enacted by Congress in 1998, requires states to establish a comprehensive accountability system for adult education programs. The WIA mandates that states must gather data on several core measures, including the educational gain of adult learners. In order to meet this requirement, the United States Department of Education developed the National Reporting System (NRS).

The assessment policies and procedures included in this document are designed to ensure that adult education programs in Kansas meet the following requirements of the NRS:

- Use of state-wide standardized assessments with parallel forms of pre- and posttests to determine educational gain of participants;
- Use of consistent testing protocols to ensure a standardized testing format and to ensure quality data; and
- Use of data to promote continuous improvement of local programs.

Quality assessment is an essential component of a quality adult education program. Kansas Adult Education is committed to quality assessment confirmed by its use of CASAS assessments since 1988, exclusive use of CASAS assessments for determining learners' entry levels and educational gains since 1995, required training, certification, and recertification for all CASAS users, ongoing support for curriculum alignment with CASAS competencies, and continuous monitoring of assessment data to ensure that adult education programs are following the Kansas Adult Education assessment policies.

Quality assessment plays a major role in the following activities:

- learners are accurately informed about their basic skill level(s);
- learners are better equipped to determine appropriate short- and long-term goals;
- instruction focuses on learners' identified needs instead of relying solely on pre-determined curricula;
- learners and programs monitor progress toward goals;
- learners and programs are better equipped to identify other factors that impact progress;
- programs are accurately informed about learners' basic skill levels;

- programs are better equipped to determine effectiveness of program design, instructors’ proficiency, curricula and materials;
- programs are able to inform stakeholders about learners’ outcomes; and
- programs have more accurate data on which to make decisions.

## 11.1 GENERAL ASSESSMENT GUIDELINES

Because CASAS is a competency-based educational system—not just a test—programs are responsible for ensuring that all staff members understand “the system.” A successful competency-based system requires that the instructors recognize the competencies that comprise the curriculum for the Employability Competency System (ECS), the Life and Work series, the Secondary Diploma Completion series, and the Government and History for Citizenship tests. A successful competency-based system requires that the instructors teach the competencies that will be measured on the assessments. A successful competency-based system requires that test administrators are aware of the different test forms, understand how to determine the appropriate test to administer, and follow testing protocol. Finally, a successful competency-based system requires the program to have a carefully designed delivery system that incorporates learner commitment, quality instruction, appropriate learning environment, and supportive services. When all staff members understand the critical role that “the system” plays and understand their roles in “the system,” the more likely learners are to achieve their goals.

Programs must ensure that the following assessment policies and standard operating procedures are in place:

- Learners have valid CASAS (Comprehensive Adult Student Assessment System) diagnostic test score(s) for determining Educational Functioning Level (EFL) **prior to completion of twelve hours of participation** in an adult education program. If a learner is continuing from the previous fiscal year, CASAS diagnostic test scores from tests administered within 90 days from the first date of instruction in the current fiscal year may be used to determine EFL. If the diagnostic test(s) were administered more than 90 days prior to the learner’s first date of instruction in the current fiscal year, an alternative version of the latest diagnostic test(s) on which a valid score was achieved should be administered to determine EFL.

- CASAS pre- and posttesting is the only vehicle used to demonstrate learners' educational gains. CASAS diagnostic tests are the assessment instruments used to determine reading, math, and listening skill levels. The CASAS Functional Writing Assessment is a standardized performance-based assessment used to determine writing skill levels. The primary focus of instruction for ABE/ASE learners should be in the areas of reading, writing, and/or math, and the primary focus for ESL learners should be in the areas of speaking/listening, reading, and/or writing. (See Section 11: Appendix II.)
- Learners are pretested in multiple skill areas (i.e., reading, math, writing, listening) in order to provide them with extensive information about their basic skills competency levels. This information will assist learners in making decisions about their participation in the program, goals, etc. Multiple pretest diagnostic scores also provide more opportunities for learners to complete an Educational Functioning Level.
- Learners are leveled in PABLO, the Kansas adult education statewide information management system, based on the lowest diagnostic pretest score in the area in which *the learner identifies a desire to study*. All diagnostic scores should be entered into PABLO, *but if a learner wishes to study only in a skill area where a higher diagnostic pre-test score was achieved*, the recommended Educational Functioning Level may be overridden. Information must be provided in the "Notes" section that explains that *the learner has indicated a desire to study exclusively in a skill area where a higher score was achieved*. **A program must never manipulate test scores to achieve learning gains that do not accurately reflect each learner's educational functioning level, the learner's educational goal, and the learner's progress in all areas in which he/she was working.** (See *PABLO Users' Manual*, August 2006.)
- For every learner, all CASAS test scores, test forms used, and dates of testing must be entered into PABLO, including information on invalid testing. Valid test scores, forms, and dates must be entered on the "Current Tests" page. All invalid test scores, forms, and testing dates must be entered in the "Notes" section on the "Current Tests" page.

Each learner's testing information in PABLO must match the actual paper documents maintained in the learner's permanent files.

The quality of a program's data is directly linked to the program's commitment to following the testing policies and procedures, accurate scoring of tests, ensuring valid testing and test scores, and reporting accurate and valid test scores. For this reason, the yearly program monitoring will focus extensively on Quality Indicator Measure 2.3: *The program adheres to standardized testing protocol, confirmed by reviewing randomly selected learners' permanent files.* (See *Indicators of a Quality Adult Education Program including Standards and Measures*, July 2009). Programs must maintain "hard" documentation of all information entered into PABLO for five years.

- Programs should strive to never test a learner on a test form more than once. Since CASAS has parallel test forms at every level and corresponding test forms in different test series, a learner would have to test multiple times at the same level before he/she would have to retest on the same test. **Regardless, a learner must never test more than once within a six-month period on the same test form.** Even if the six-month time frame has expired, a learner must never test back-to-back on the same test form. The learner must be given at least one parallel test form between test administrations of the same test. Administration of the same test within a six-month time frame or administration of the same test form for back-to-back testing results in an invalid test score. These invalid test scores, forms, and testing dates must be entered into the "Notes" section on the "Current Tests" page of PABLO.
- Learners should be posttested initially between 70 and 90 hours of program services and then at every 70 to 90 hours of instruction thereafter. While every learner is not expected to demonstrate significant learning gains within 70 to 90 hours of instruction, learners **and** programs need to have a clearly defined process for evaluating their learners' progress and the program's effectiveness at providing services.

**There are three exceptions to this policy.** The first exception is the administration of appropriate posttests to learners who have indicated they are leaving the program although they have not participated in 70 hours of instruction. While these learners are not expected to

demonstrate a significant learning gain, no posttesting will **guarantee** no evidence of learning gains.

The second exception is when posttesting between 70 to 90 hours of instruction would interfere with the scheduled design of a class session. For example, if a class session is scheduled for eight weeks with 12 hours of instruction per week, posttesting should occur at the end of the class session (approximately 96 hours) not between 70 to 90 hours of instruction.

Finally, diagnostic posttests should also be administered to all participants with more than 50 hours of instruction before the program closes for an extended period (i.e. summer and winter holiday breaks).

- Distance learners' (See Section 4.7) testing information that is entered into PABLO must be obtained through on-site testing following the assessment policies and standard operating procedures provided in this section.
- **Programs MUST not administer posttests to learners who have fewer than 30 hours of instructions.**
- Test security is recognized as an essential component of standardized testing. Test booklets, self-scoring answer sheets, answer keys, and all other testing materials must be maintained in a secured area.
- No individual, work group, committee, team, and/or program may develop any workshop, training, or instructional session or create any materials designed to teach or prepare learners to answer specific test questions that appear on any CASAS test. Instructors may not review specific test items with learners when discussing test results nor include actual test items or slightly revised test items in any instructional materials. **Instructors should focus on the competencies and the underlying basic skills (content standards) during instruction and while preparing learners for testing.**
- Every standardized assessment has a standardized testing protocol that must be followed to ensure that test results accurately reflect learners' educational levels and educational gains. **Kansas Adult Education requires that every person who administers a CASAS assessment,**

**scores a CASAS assessment, and reports scores for entry into PABLO must be CASAS certified.** CASAS certification is achieved by attending the *CASAS ABE/ASE/ESL Implementation Workshop* and successfully completing the certification exam. Individuals who have the basic CASAS certification must renew their CASAS certification every three years, at a minimum. *CASAS ABE/ASE/ESL Implementation Workshops* are offered several times during the year during regional workshops. All workshops are posted on the Kansas Adult Education calendar at the following web address:  
<http://kan-ed.org/cgi-bin/webcalng/webcalng.pl?op=month&calendar=Adult+Education>

- In addition to being certified to use CASAS reading, math, and listening pre- and posttests, an individual must have an additional certification to use the CASAS Functional Writing Assessment (FWA) instruments for pre- and posttesting of writing skills. In order to be certified to use the CASAS FWA an individual must attend a full-day workshop (CASAS FWA: Part I), complete a “homework” assignment, complete a half-day workshop (CASAS FWA: Part II), and pass a certification exam. Once an individual is certified to use the CASAS FWA, the individual must be recertified every 24 months by passing a recertification exam. A *CASAS Functional Writing Assessment Workshop* is offered several times during the year during regional workshops. All workshops are posted on the Kansas Adult Education calendar at the following web address:  
<http://kan-ed.org/cgi-bin/webcalng/webcalng.pl?op=month&calendar=Adult+Education>
- In order to prevent “test administration drift,” programs must ensure that all test administrators have access to **and use the CASAS test administration manual (TAM) for every test each time it is administered.** Programs are also responsible for ensuring that every test is administered in a testing environment that is designed to elicit learners’ best efforts, i.e., adequate space, appropriate furniture, good lighting, no interruptions, no distracting sounds. Programs must provide appropriate accommodations for learners who have disabilities. (See Section 11.3)
- Programs must have testing policy and procedures in place to ensure the following:

- \* prior to testing, learners are informed of the reason for the testing and how the test results will be used;
- \* after testing, learners are confidentially informed of test results and implications;
- \* the appropriate amount of instruction has been provided between pretesting and posttesting;
- \* the appropriate pretest and posttest is administered, checking previous testing records to determine that the correct level and form of the test has been selected;
- \* the test is administered following the standardized testing protocol designed for the test and in an appropriate testing environment;
- \* the test is accurately scored;
- \* the score is checked for validity;
- \* all valid test scores, test forms, and dates of testing are accurately entered into the “Current Tests” page of PABLO; and
- \* all invalid test scores, test forms, and dates of testing are accurately entered into the “Notes” section on the “Current Tests” page of PABLO.

## **11.2 PHASES OF ASSESSMENT**

Assessing the progress and skills of learners is a continuous process, starting from the moment they arrive in the office or classroom and continuing until they leave the program. Programs or classes should consider the following phases of assessment:

### **Orientation**

The registration form completed during the orientation process will assist programs in assessing some of the needs and skills of new learners. Staff should review the completed form to gain a better understanding of each new learner. Perhaps the learner has difficulty writing the correct information on the form – does this fact indicate low literacy skills, a disability, or nervousness? How many years of formal education has the learner completed? What is/was the learner’s job? Does the learner have an obvious disability, or did the learner disclose a hidden disability? Think about how this information will assist in determining how best to meet the needs of this learner.

### **Initial Assessment/Program Placement**

As a part of the orientation process, programs will administer the CASAS ECS (Employability Competency System) or CASAS ESL appraisal and diagnostic tests. These tests assess an individual's ability to apply basic reading, math, listening, and/or writing skills in a functional context. The ABE/ASE appraisal test has two components, reading and math. The reading section (25 items) and the math section (25 items) are composed of multiple-choice questions.

The ESL appraisal test has four components: listening, reading, writing, and speaking/listening. The listening section (23 items) and the reading section (20 items) are composed of multiple-choice questions. The writing test involves writing two sentences from an audiotape, and the speaking/listening section consists of a six-item one-on-one interview. Ideally, the initial appraisal assessment would involve each of the four skill areas (e.g. listening, speaking, reading, writing) to provide the program and the participant with a broad perspective on the learner's abilities.

Instructors' interactions and conversations with learners during the intake process will also assist the program in making an early informal assessment of the learner's abilities in these skill areas. Keep in mind the following purposes of the initial tests: to determine what skills and abilities the learner already possesses, to develop a plan of action for meeting his or her needs, and to begin the process for determining the most appropriate class placement.

### **Determination of Educational Functioning Levels (EFL)**

CASAS diagnostic testing is used to determine the learner's Educational Functioning Level for federal/state reporting requirements. Individuals administering CASAS assessments must be trained (certified) by a CASAS state-level trainer. Any scores obtained from testing that is conducted by a non-certified examiner may not be entered in the "Current Tests" page of PABLO. These invalid scores, the test forms used, and the dates of testing must be entered into the "Notes" section of the "Current Tests" page of PABLO. In order to meet the USDOE's requirement for statewide standardized assessments, the following guidelines must be adhered to:

**Reading:** When leveling a learner based on a reading score, a valid CASAS Reading Diagnostic Test score must be entered in the "Current Tests" page of PABLO. If the learner's diagnostic test score is not in the valid range, an

additional CASAS Reading Diagnostic Test must be administered (either at a lower or higher level, depending on whether the invalid test score was at the upper or lower end of the scale score) in order for the learner to achieve a valid diagnostic test score. **Exception:** when a learner's reading skills are so limited that he/she cannot achieve a valid diagnostic test score on the **lowest level CASAS Reading Diagnostic Test** (Level Pre-A, Form 27), a score of 0 may be entered as the diagnostic reading score in the "Current Tests" page of PABLO. A score of 0 may only be entered after the lowest level diagnostic test was administered and a valid score could not be achieved. The diagnostic test form on which a valid score could not be achieved and the date of testing must be entered in the "Notes" section on the "Current Tests" page of PABLO.

**Math:** When leveling a learner based on a math score, a valid CASAS Math Test score must be entered into the "Current Tests" page of PABLO. If the learner's diagnostic test score is not in the valid range, an additional CASAS Math Diagnostic Test must be administered (either at a lower or higher level, depending on whether the invalid test score was at the upper or lower end of the scale score) in order for the learner to achieve a valid diagnostic test score. **Exception:** when a learner's math skills are so limited that he/she cannot achieve a valid diagnostic test score on the **lowest level CASAS Diagnostic Math Test** (Level A, Form 11, Form 31, or Form 81), a score of 0 may be entered as the diagnostic math score in the "Current Tests" page of PABLO. A score of 0 may only be entered after the lowest level diagnostic test was administered and a valid score could not be achieved. The diagnostic test form on which a valid score could not be achieved and the date of testing must be entered in the "Notes" section on the "Current Tests" page of PABLO.

**Listening:** When leveling a learner based on a listening score, a valid CASAS Listening Diagnostic Test score must be entered. If the learner's diagnostic test score is not in the valid range, an additional CASAS Listening Diagnostic Test must be administered (either at a lower or higher level, depending on whether the invalid test score was at the upper or lower end of the scale score) in order for the learner to achieve a valid diagnostic test score. **Exception:** when a learner's listening skills are so limited that he/she cannot achieve a valid listening test score on the **lowest level CASAS Diagnostic Listening Test** (Level A, Form 51 or Form 81), a score of 0 may be entered as the diagnostic listening score in the "Current Tests" page of PABLO. A score of 0 may only be entered after the lowest level diagnostic test was administered and a valid score could not be achieved. The

diagnostic test form on which a valid score could not be attained and the date of testing must be entered in the learner's "Notes" section on the "Current Tests" page of PABLO.

**Writing:** When leveling a learner based on a writing score, a valid **narrative** writing score derived from the Picture Task section of the CASAS Functional Writing Assessment must be entered. The individual administering and scoring the CASAS Picture Task writing sample must be certified to administer the CASAS Functional Writing Assessment.

All writing scores (pretests and posttests) entered into the "Current Test" page of PABLO must be determined by **two individuals** certified to use the CASAS Functional Writing Assessment. The two certified scorers must be within five (5) scale score points of one another after scoring the writing sample. When the two scale scores are within five (5) points of one another, the lower scale score must be entered into PABLO. If the two scorers do not arrive at scale scores that are within five (5) points of one another, they must discuss their scoring and come to an agreement that results in scale scores that are within five scale score points of one another. After agreeing to scale scores that are within five points of one another, the lower scale score must be entered into PABLO. If agreement cannot be achieved, a third certified scorer must read and score the writing sample. This third score must be compared with the two initial scores, and if any two scale scores are within five (5) points of one another, the lower scale score must be entered into PABLO. If the third scorer's scale score is not within five scale score points of one of the other two scorer's scores, the third scorer must discuss the writing sample and the scoring process with the first two scorers and come to agreement (within five scale score points) on the scores. At this time, the lowest scale score must be entered into PABLO.

CASAS Functional Writing Picture Prompts (Forms 460 – 466) must be used as the pretest and posttest instruments for determining learners' educational functioning levels in writing. No picture prompt should be reused for progress testing until the other six prompts have been used between the first use of a prompt and later use of the same prompt. The Form Task section of the CASAS Functional Writing Assessment may **not** be used to level a learner in writing.

**All invalid test scores, test forms, and testing dates (other than the exceptions noted above) must be entered in the "NOTES" section on the "Current Tests" page on PABLO.**

## **On-Going Assessment**

Once learners are assessed and placed in appropriate classes, on-going assessment is critical to inform learners about what they know, in what areas and to what extent they are making progress, and in what areas they still need improvement. On-going assessment may be formal (e.g. a written test) or informal (e.g. teacher observation, checklists, etc.). In addition, it is important to ensure that the assessment tools and techniques that are used are aligned with instruction—and that instruction is aligned with the assessment tools. The most effective assessment systems will also include a way for learners to self assess their progress.

The CASAS Pre-Employment/Work Maturity Checklists, Checklists A, B, C, D, E, and F cannot be used to determine Educational Functioning Levels nor to document educational gain because they do not meet the rigorous “gold standard” required by the USDOE. However, because of the importance of teaching workplace readiness skills to many adult learners, the Kansas Board of Regents Adult Education staff developed standardized assessment procedures for using the checklists and adopted the aligned PBS LiteracyLink *Workplace Essential Skills* multimedia curriculum for teaching the workplace readiness competencies. Program staff using the checklists to document learners’ workplace readiness skills attainment for Quality Indicator Measure 2.2 must attend the KBOR *Workplace Essential Skills* (WES) training **and** the *Using Performance-based Assessments* (Pre-Employment/Work Maturity Checklists) training, use the *Workplace Essential Skills* multimedia curriculum, and follow the performance-based assessment protocol outlined in the *KBOR CASAS ECS Pre-Employment/Work Maturity Assessment Manual*.

The *Kansas Technology Competency Checklists* cannot be used to document educational gain because they do not meet the rigorous “gold standard” required by the USDOE. However, because of the importance of teaching technology skills to adult learners, the Kansas Board of Regents staff and the Adult Education Technology Task Force contributed hundreds of hours of work to develop standardized assessment procedures for using the checklists and curriculum for teaching the competencies. Program staff using the checklists to document learners’ technology skills attainment for Quality Indicator Measure 5.2 must attend the *Using Performance-based Assessments* (Technology) training and follow the performance-based assessment protocol outlined in the *Kansas Technology Competency Assessment Manual*.

The *CASAS Government and History for Citizenship Test* cannot be used to document educational gain. However, this assessment is the standardized instrument that is used in Kansas to document attainment of the goal “Achieve Citizenship Skills.” The government and history test has two alternate forms, Form 963 and Form 964. The two forms are parallel in content and difficulty. They contain 30 multiple-choice items that measure basic knowledge of U.S. government, history, voting, geography, documents, holidays, and national symbols. The government and history test also has a writing component, the *Citizenship Dictation Test*, which consists of three sentences selected by the examiner from among six options and dictated to the examinees. In order to attain the citizenship goal, an individual must achieve a minimum score of 206 (18 correct) on the *CASAS Government and History for Citizenship Test* (Form 963 or 964) and a total score of 2 or more on the *CASAS Citizenship Dictation Test*. Test examiners of this assessment **MUST** carefully study the *CASAS Government and History for Citizenship Test Administration Manual* before administering this assessment for the first time and review the manual before subsequent test administrations.

**Test examiners must also keep a record of the three sentences used for dictation on the pretest to ensure that the remaining three sentences are used for dictation on the posttest.** As with all assessments, a learner should not be given any sentence during the *CASAS Citizenship Dictation Test* that was used during a previous administration of the *CASAS Citizenship Dictation Test* within a six-month time period. Programs must also have a process in place to ensure that test examiners randomly vary the sentences used for the *Citizenship Dictation* pretest to prevent test takers from “sharing” the sentences with future test takers. Since different sentences will be used in each pretesting session, different sentences will be used in posttesting session. Therefore, programs must be diligent about entering the sentences used for pretesting and posttesting in each participant’s “Notes” section on the “Current Tests” page on PABLO to ensure that a learner is never given the same dictation sentence within a six-month time period.

### **Posttesting/Completion Assessment**

Every program should have clearly defined timelines for administering diagnostic posttests. There is very little likelihood of significant educational gains if the learner has attended the program for less than 70 hours. However, a diagnostic posttest should be administered to an individual with more than 30 hours of instruction if the learner discloses that he/she is

exiting the program. Diagnostic posttests should also be administered to all participants with 50 or more hours of instruction before the program closes for an extended period (i.e. summer and winter holiday breaks).

Ideally, the learner will be administered a diagnostic test between 70 and 90 hours of instruction in every area in which he/she needs to improve. **The National Reporting System (NRS) does not require that learners be posttested in areas in which they have had no instruction. Programs must provide intensive instruction and follow-up assessment in the learner’s lowest functioning level area, unless the LEARNER determines that he/she does not need and/or does not want to study in the lowest functioning level area.** When the LEARNER makes this determination, the recommended Educational Functioning Level may be overridden on PABLO. Information must be provided in the “Notes” section on the “Current Tests” page on PABLO that explains that *the learner has indicated a desire to study exclusively in a skill area where a higher score was achieved.*

In most instances, CASAS tests series are aligned on the same scale and, therefore, can be used interchangeably. For example, a learner who pretests on Reading Level A Form 11 (ECS Series) may be posttested on Reading Level A Form 12 (ECS series) or on Reading Level A Form 31 (Life Skills series) or on Reading Level A Form 81 (Life and Work series) or even on a Reading Level B form if the *CASAS Suggested Next Test Form* document indicates that a Level B assessment is the appropriate posttest to administer. While most programs use only one CASAS series as their primary assessment instruments for a specific group of learners (i.e., ABE or ESL), programs may occasionally use a test form from another series to prevent reusing a test within a six-month time frame. (See Section 11: Appendix I.) Exceptions: See CASAS Secondary Assessment series and CASAS Life and Work Listening series.

While the CASAS test series are aligned on the same scale, different test series focus on different competencies. And different levels of a test series usually focus on different competencies. Therefore, the appropriate posttest(s) for each learner should be determined immediately after scoring the pretest(s). The appropriate posttest is determined by referencing the *CASAS Suggested Next Test Form* document. Identifying the posttest form that will be given to the learner provides the instructor with a list of competencies that the learner should master prior to posttesting. This information combined with the information provided by the pretest form is

the basis for the learner’s individual learning plan. **In a competency-based educational system, linking assessment to instruction is critical.**

Programs using the CASAS Secondary Assessment series **may not interchange** a test from this series with a test from another CASAS series. Pre- and posttesting in this series **must involve** parallel test forms in one of the eight subject areas, and a pretest from one subject area may not be paired with a posttest from a different subject area. If a program adopts the CASAS Secondary Assessment series to assess higher level learners (high Level 4, Level 5, and Level 6), the following tests must be used for pre- and posttesting:

<b>Subject Area</b>	<b>Secondary Assessment Parallel Test Forms</b>	<b>PABLO Skill Domain</b>
Mathematics	505/506	Math
Economics	507/508	Reading
American Government	509/510	Reading
United States History	511/512	Reading
English/Language Arts	513/514	Reading
World History	515/516	Reading
Biological Science	529/530	Reading
Physical Science	531/532	Reading

Programs using the CASAS Life and Work Listening assessment **may not interchange** a test from this series with a test from another CASAS series. Programs using the CASAS Life and Work Listening diagnostic tests must use the Life and Work appraisal test. Similarly, because the Life and Work Listening diagnostic tests are so different from other CASAS listening assessments, a Life and Work Listening diagnostic pretest must be followed by a Life and Work Listening diagnostic posttest. An educational functioning level completion cannot be achieved by giving a Life and Work Listening diagnostic test as a pretest followed by a Life Skills or ECS Listening diagnostic test as a posttest or vice versa.

## **11.3 GUIDELINES FOR PROVIDING ACCOMMODATIONS USING CASAS ASSESSMENTS FOR LEARNERS WITH DISABILITIES**

### **Purpose**

The accountability standards in the 1998 Workforce Investment Act include the Rehabilitation Act Amendments of 1998 to improve access to adult programs and achieve employment outcomes for learners with disabilities. Section 504 in the Rehabilitation Act of 1973, the Individuals with Disabilities Education Act of 1997, and the Americans with Disabilities Act of 1990 (ADA) have provisions related to testing accommodations for learners with disabilities. The ADA ensures equal access for all learners in education programs, including learners with disabilities in the No Child Left Behind Act of 2001. Accommodations provide an opportunity for all test takers to demonstrate their skills and ability. The accommodations may alter test administration procedures without changing what the test is intended to measure.

The following sections include information on the rights and responsibilities of local programs when serving learners with disabilities and the rights and responsibilities of learners with disabilities. Guidelines are provided for administering CASAS assessments using accommodations for learners with documented disabilities. The suggested accommodations for disability categories consist of the following provisions:

- accommodations in test administration procedures, and
- use of appropriate CASAS test forms.

### **Local Programs' and Learners' with Disabilities Rights and Responsibilities**

Local test administrators must consider the individual needs of the learner when they provide accommodations. The responsibility of fulfilling learner requests for accommodations is that of the local program, not of KBOR or CASAS. However, KBOR Adult Education can provide information to programs about the appropriateness of an accommodation and, if necessary, information on how to access community resources. In addition, CASAS will work with state and local agencies to develop additional tests that are in a format reflecting the manner in which learners acquire and report information needed to function in everyday life. For example, if a learner is legally blind and reads information using Braille, then a standardized

reading test in a Braille format is appropriate for testing. CASAS is currently developing such a form to include test items in Braille that reflect functional literacy situations in the life and work of a person who is blind.

Local programs are responsible for providing fully accessible services and have the responsibility to ensure that these services meet reasonable criteria. In addition, the program administering the test must provide any necessary accommodations at no cost to the learner. The costs are negligible for most of the common accommodations that learners will request.

In Kansas, all adult education programs are required to provide extensive information to **all** adult education participants about the rights and responsibilities of individuals with disabilities and the rights and responsibilities of programs serving individuals with disabilities during the orientation session and during the follow-up one-on-one counseling session. (See *Accommodating Adults with Disabilities in Adult Education Programs, Revised 2005*). After this information is provided, participants may be asked to disclose information about any disability that may impact their progress toward meeting their short- and long-term goals. However, programs may legally ask this very personal question **for only one reason—to ensure that the learner receives appropriate educational services, including accommodations if necessary**. Programs cannot ask questions about a participant’s disability status simply for reporting on PABLO.

Adult learners with disabilities are responsible for providing information on and documentation of their disability. Documentation may include a medical doctor’s report, a diagnostic assessment report from a certified professional, Individual Education Plans (IEPs) records from learners previously served under Individuals with Disabilities Education Act (IDEA), a report from vocational rehabilitation or other service providers.

If a learner discloses a disability, the adult education program must ensure that the following occurs:

- A staff member reviews the documentation of the disability with the learner to begin the process of identifying the impact of the disability on the learner’s previous educational efforts and on the learner’s short- and long-term goals. During this process, the staff member should use the “Functional Needs Interview” in the *Accommodating Adults with Disabilities in Adult Education Programs* notebook.

- The staff member and the learner compile a history on the learner’s use of accommodations and the learner’s perception of the effectiveness of the accommodations previously used. Programs are required to complete the *Initial Documentation of Disability* form for every learner identified on PABLO as having a disability. (See Section 11: Appendix III.)
- A staff member assists the learner in identifying possible appropriate accommodations for different scenarios. During this process, the staff member should use the “Accommodation Selection Component” of the *Accommodating Adults with Disabilities in Adult Education Programs* notebook. For example, a learner may use books on tape to review science and history. However, the learner would not use a reader or a taped version of a CASAS reading test to determine the learner’s educational functioning level in reading or as a *reading* pre- or posttest.
- If the program and learner identify an appropriate accommodation that the learner has not used previously, the program provides the learner with instruction on the use of the accommodation and opportunities to practice using the accommodation in a non-threatening environment before using the accommodation publicly or during testing.
- A staff member is involved in frequent one-on-one counseling with the learner about his/her progress in the program, use of accommodation(s), effectiveness of the accommodation(s), portability of the accommodations into non-educational settings and high-stakes scenarios, “acceptability” of the accommodation(s), etc. Revisions are made if necessary. Programs are required to complete the *Follow-up Documentation Form* (See Section 11: Appendix III.)
- All learners’, including learners with disabilities, test scores, test forms, and dates of testing are entered into PABLO. Information about accommodations provided to learners with disabilities during testing or instruction must be maintained in the learners’ permanent files not in PABLO.
- PABLO data is reviewed on a regular basis to compare the outcomes of learners with no identified disabilities to the outcomes of learners with disabilities to identify areas for program improvement. Local

programs may also want to collect data on which and how many accommodations or alternate test forms are provided during test administration for program improvement purposes.

### **Accommodations in Test Administration Procedures**

Local test administrators may provide or allow some accommodations in test administration procedures or environment for documented disabilities without contacting KBOR or CASAS. Test administrators frequently use these same “accommodations” as “test-taking strategies” for other learners who do not have documented disabilities. For example, a learner may request to take only one test per day, to test in a room with natural lighting instead of a room with artificial lighting, or to chew gum while testing. Learners may also be allowed to use a variety of readily available educational tools when taking a test, such as a plain straight-edge ruler, a magnifying strip or glass, colored overlays, graph paper, ear plugs, and other devices as deemed appropriate. (See *Accommodating Adults with Disabilities in Adult Education Programs, Revised 2005*.)

Sample accommodations in test administration procedures or environment are shown in Table 1. Examples of these accommodations are extended time, supervised breaks, or sign language interpreter *for test administration directions only*. The accommodations listed are suggestions only. Accommodations are based on needs of individual learners and *not* on a disability category. Any testing accommodation must be consistent with documentation on the *Initial Documentation of Disability* form and the *Follow-up Documentation Form* maintained in the learner’s permanent file. These strategies do not alter the validity of the test results. The local test administrator does not need to contact KBOR or CASAS when providing these accommodations.

**NOTE:** It is *not* an appropriate accommodation in test administration procedures to *read a CASAS reading test* to a learner with low literacy skills or blindness. The purpose of a reading test is to assess reading skill levels and to determine the learner’s appropriate instructional levels, not to assess knowledge of a subject area.

### **Use of Appropriate CASAS Test Forms**

It is important to use an appropriate test form that best meets the learner’s goals and manner of receiving and reporting information. Most learners with a disability can take some form of a CASAS test. CASAS is able to

provide large-print versions of all tests. Large-print tests and computer-based tests are examples of frequently-used test delivery systems that serve as accommodations for many adult learners with disabilities. The Employability Competency Test (ECS) appraisal as well as the ECS reading pre- and posttests and the Life Skills reading pre- and posttests are available in large-print formats. Large-print formats of the Beginning Literacy Reading forms (Forms 27 and 28) and the Reading for Citizenship series are also available. The POWER performance-based assessment and the Tests for Life Skills, Forms 310-340, are available specifically for learners with developmental disabilities.

CASAS has a variety of standardized performance-based assessment instruments to use with learners who do not demonstrate their skills well on multiple-choice tests. Standardized performance-based instruments are available for special purposes such as demonstration of writing and speaking skills and functional life skills for developmental disabilities.

CASAS is currently expanding development of other test forms to measure basic literacy skills of learners with specific documented disabilities. For example, a functional listening test to measure basic literacy skills is in development for learners who are blind or have a visual impairment. Current CASAS reading, math, and listening tests include multiple displays (test prompts) of actual everyday items — maps, telephone books, paycheck stubs, graphs — that cannot be translated realistically into an audio format or into Braille. Programs should contact CASAS if you are interested in participating in a national validation of appropriate assessment for visually impaired or blind learners. The CASAS test development process always includes field-based specialists who help design, develop, and field test assessment instruments to ensure appropriateness for assessment of the specific population.

### **When Appropriate CASAS Tests Are Not Available**

Please contact CASAS to obtain permission *before* changing the test format locally, if a revised test form is not currently available from CASAS. CASAS requires approval because changes in test format affect the standardization and statistical measures for the test. CASAS will provide advice regarding appropriate accommodations that are not currently available to test administrators.

Contact KBOR Adult Education at 785.296.7159 or [dglass@ksbor.org](mailto:dglass@ksbor.org) or CASAS at 858-255-1036 for further information on appropriate accommodations for using CASAS tests.

**Table 1**  
**Providing Accommodations Using CASAS Assessment**

DISABILITY	TEST ADMINISTRATION PROCEDURES	CASAS TEST FORMS AVAILABLE	CASAS TEST FORMS IN DEVELOPMENT
<b>Specific Learning Disability and/or ADHD</b> <b>such as dyslexia, dyscalculia, receptive aphasia, hyperactivity, written language disorder, attention deficit disorder</b>	Extended time Alternate schedule Frequent breaks	<i>Large-print tests</i>	Auditory format for specific learning disabilities
	Scribe/writer/alternate room Computer — spelling and grammar check disabled Simple calculator <i>for Level A/B only</i>		Audio format for Government and History for Citizenship
<b>Deaf or Hearing Impaired</b>	Sign language interpreter <i>for test directions only</i> Head phones for those taking a listening test		
<b>Blind or Visually Impaired</b>	Magnifier	<i>Large-print CASAS tests</i> <i>Computer-based CASAS tests</i>	Auditory format Braille format
<b>Mobility impairment</b>	Extended time Alternate site/equipment Scribe/writer/communication board		
<b>Psychiatric Disability such as schizophrenia, major depression</b>	Extended time Supervised breaks		
<b>Developmental Disability such as autism, cerebral palsy, epilepsy, mental retardation</b>		<i>Adult Life Skills</i> Forms 310 through 350 <i>POWER</i> , Form 305 and 303	<i>POWER</i> - Form 301

*Note.* The accommodations listed above are suggestions only and in addition to use of regular CASAS tests. Accommodations are based on needs of individual learners and *not* on a disability category. Any testing accommodation should be consistent with documentation in the annual plan, such as an IEP. Alternate test forms developed by CASAS do not modify test standards.

## **11. APPENDIX I**

### **Standardized Assessments Approved for Kansas Adult Education Programs**

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**Standardized Assessments Approved for  
Kansas Adult Education Programs**

<b>Population/Subject Area</b>	<b>EFL</b>	<b>Assessments</b>
ABE/ASE Appraisal	1-6	CASAS Employability Competency System (ECS) Form 130
ESL Appraisal	7-12	CASAS ESL Appraisal Test Form 20 CASAS Life and Works Appraisal Test Form 80
ABE/ASE/ESL Appraisal	1-12	Life Skills Appraisal Form 30
Special Populations	Levels AA- AAAAA	Test for Adult Life Skills Locator Form 350
<b>CASAS Assessments for Determining Learners' Entry Levels/Level Completions (NRS Reporting)</b>		
Diagnostic Reading	1, 7, 8	Beginning Literacy Reading Forms 27-28
	1-6	Employability Competency System (ECS) Forms 11R-18R
	1-6	Workforce Learning Systems (WLS) Forms 213R-218R
	1-12	Life and Work Forms 81R-88R, 185R-186R
	1-12	Life Skills Forms 31R-38R
Diagnostic Math	1-6	Employability Competency System (ECS) Forms 11M-18M
	1-6	Workforce Learning Systems (WLS) Forms 213M-218M
	1-6	Life Skills Forms 31M-38M*
Diagnostic Listening	7-12	Life Skills Forms 51L-56L
	7-12	Life and Work Forms 81L-86L (must not be interchanged with other Life Skills and/or ECS listening assessments)
	10-12	Employability Competency System (ECS) Forms 63L-66L
Diagnostic Writing	1-6, 8-12	Functional Writing Assessment (FWA) Picture Tasks 460-466
Life Skills for Special Populations	Levels AA- AAAAA	Tests for Adult Life Skills Forms 310-343 STRETCH Competency Tests Forms 360-374
<b>Assessments for Other Outcomes</b>		
Citizenship	9-12	CASAS Government and History for Citizenship Forms 963-964
Workplace Essential Skills	1-6, 9-12	CASAS Pre-Employment/Work Maturity Checklists A-G
Technology	1-12	Kansas Technology Competency Checklists

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## **11. APPENDIX II**

### **Outcome Measures Definitions**

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## Outcome Measures Definitions

Implementation: July 1, 2008

### Educational Functioning Level Descriptors—Adult Basic Education Levels

Literacy Level	Basic Reading and Writing	Numeracy Skills	Functional and Workplace Skills
<p><b>Level 1</b></p> <p><b>Beginning ABE Literacy</b></p> <p><b>Pre-test Scores:</b> CASAS Math: 200 and below CASAS Reading: 200 and below CASAS Writing: 200 and below</p> <p><b>Completion Benchmarks:</b> CASAS Math: &gt;200 CASAS Reading: &gt;200 CASAS Writing: &gt;200</p>	<p>Individual has no or very minimal reading or writing skills. At the lower range of this level, may have little or no comprehension of how print corresponds to spoken language and may have difficulty using a writing instrument. May recognize common signs that are universally accepted symbols. At the upper range of this level, individual can recognize, read and write letters and number, but has a limited understanding of connected prose and may need frequent re-reading. Can write a limited number of basic sight words and familiar words and phrases, including very simple messages. Can write basic personal information on simplified forms. Narrative writing is disorganized and unclear; inconsistently uses simple punctuation (e.g., periods, commas, questions marks); contains frequent errors in spelling.</p>	<p>Individual has little or no recognition of numbers or simple counting skills or may have only minimal skills, such as the ability to add or subtract single digit numbers.</p>	<p>Individual has little or no ability to read basic signs or maps, can provide limited personal information on simple forms and has few or no workplace skills. The individual can handle routine entry-level jobs that require little or no basic written communication or computational skills and no knowledge of computers or other technology.</p>
<p><b>Level 2</b></p> <p><b>Beginning Basic Education</b></p> <p><b>Pre-test Scores:</b> CASAS Math: 201-210 CASAS Reading: 201-210 CASAS Writing: 201-225</p> <p><b>Completion Benchmarks:</b> CASAS Math: &gt;210 CASAS Reading: &gt;210 CASAS Writing: &gt;225</p>	<p>Individual can read simple material on familiar subjects and comprehend simple and compound sentences in single or linked paragraphs containing familiar vocabulary. Can write simple notes and messages based on familiar situations, but lacks clarity and focus. Sentence structure lacks variety, but shows some control of basic grammar (e.g., present and past tense), and some control of basic punctuation (e.g., periods, capitalization).</p>	<p>Individual can count, add and subtract three digit numbers, can perform multiplication through 12; can identify simple fractions and perform other simple arithmetic operations.</p>	<p>Individual is able to read simple directions signs and maps, fill out simple forms requiring basic personal information, write phone messages and make simple change. There is minimal knowledge of, and experience with, using computers and related technology. The individual can handle basic entry level jobs that require minimal literacy skills; can recognize very short, explicit, pictorial texts, e.g., understands logos related to worker safety before using a piece of machinery; can read want ads and complete simple job applications.</p>

## Outcome Measures Definitions

### Educational Functioning Level Descriptors—Adult Basic Education Levels

Literacy Level	Basic Reading and Writing	Numeracy Skills	Functional and Workplace Skills
<p><b>Level 3</b></p> <p><b>Low Intermediate Basic Education</b></p> <p><b>Pre-test Scores:</b> CASAS Math: 211-220 CASAS Reading: 211-220 CASAS Writing: 226-242</p> <p><b>Completion Benchmarks:</b> CASAS Math: &gt;220 CASAS Reading: &gt;220 CASAS Writing: &gt;242</p>	<p>Individual can read text on familiar subjects that have a simple and clear underlying structure (e.g., clear main idea, chronological order). Can use context to determine meaning; can interpret actions required in specific written directions. Can write simple paragraphs with main idea and supporting detail on familiar topics (e.g., daily activities, personal issues) by recombining learned vocabulary and structures; can self and peer edit for spelling and punctuation errors.</p>	<p>Individual can perform with high accuracy all four basic math operations using whole numbers up to three digits, can identify and use all basic mathematical symbols.</p>	<p>Individual is able to handle basic reading, writing and computational tasks related to life roles, such as completing medical forms, order forms or job applications; can read simple charts, graphs labels and payroll stubs and simple authentic material if familiar with the topic. The individual can use simple computer programs and perform a sequence of routine tasks given directions using technology (e.g., fax machine, computer operation). The individual can qualify for entry level jobs that require following basic written instructions and diagrams with assistance, such as oral clarification; can write a short report or message to fellow workers; can read simple dials and scales and take routine measurements.</p>
<p><b>Level 4</b></p> <p><b>High Intermediate Basic Education</b></p> <p><b>Pre-test Scores:</b> CASAS Math: 221-235 CASAS Reading: 221-235 CASAS Writing: 243-260</p> <p><b>Completion Benchmarks:</b> CASAS Math: &gt;235 CASAS Reading: &gt;235 CASAS Writing: &gt;260</p>	<p>Individual is able to read simple descriptions and narratives on familiar subjects or from which new vocabulary can be determined by context; can make some minimal inferences about familiar texts and compare and contrast information from such texts, but not consistently. Individual can write simple narrative descriptions and short essays on familiar topics; has consistent use of basic punctuation, but makes grammatical errors with complex structures.</p>	<p>Individual can perform all four basic math operations with whole numbers and fractions; can determine correct math operations for solving narrative math problems and can convert fractions to decimals and decimals to fractions; can perform basic operations on fractions.</p>	<p>Individual is able to handle basic life skills tasks such as graphs, charts and labels, and can follow multi-step diagrams; can read authentic materials on familiar topics, such as simple employee handbooks and payroll stubs; can complete forms such as a job application and reconcile a bank statement. Can handle jobs that involve following simple written instructions and diagrams; can read procedural texts, where the information is supported by diagrams, to remedy a problem, such as locating a problem with a machine or carrying out repairs using a repair manual. The individual can learn or work with most basic computer software, such as using a word processor to produce own texts; can follow simple instructions for using technology.</p>

## Outcome Measures Definitions

### Educational Functioning Level Descriptors—Adult Basic Education Levels

Literacy Level	Basic Reading and Writing	Numeracy Skills	Functional and Workplace Skills
<p><b>Level 5</b></p> <p><b>Low Adult Secondary Education</b></p> <p><b>Pre-test Scores:</b>  CASAS Math: 236-245  CASAS Reading: 236-245  CASAS Writing: 261-270</p> <p><b>Completion Benchmarks:</b>  CASAS Math: &gt;245  CASAS Reading: &gt;245  CASAS Writing: &gt;270</p>	<p>Individual can comprehend expository writing and identify spelling, punctuation, and grammatical errors; can comprehend a variety of materials such as periodicals and non-technical journals on common topics; can comprehend library reference materials, and compose multi-paragraph essays; can listen to oral instructions and write an accurate synthesis of them; can identify the main idea in reading selections and use a variety of context issues to determine meaning. Writing is organized and cohesive with few mechanical errors; can write using a complex sentence structure; can write personal notes and letters that accurately reflect thoughts.</p>	<p>Individual can perform all basic math functions with whole numbers, decimals and fractions; can interpret and solve simple algebraic equations, tables and graphs and can develop own tables and graphs; can use math in business transactions.</p>	<p>Individual is able or can learn to follow simple multi-step directions, and read common legal forms and manuals; can integrate information from texts, charts and graphs; can create and use tables and graphs; can complete forms and applications and complete resumes; can perform jobs that require interpreting information from various sources and writing or explaining tasks to other workers; is proficient using computers and can use most common computer applications; can understand the impact of using different technologies; can interpret the appropriate use of new software and technology.</p>
<p><b>Level 6</b></p> <p><b>High Adult Secondary Education</b></p> <p><b>Pre-test Scores:</b>  CASAS Math: 246 and higher  CASAS Reading: 246 and higher  CASAS Writing: 271 and higher</p> <p><b>Completion Benchmark:</b>  Pass Official GED Test Battery</p>	<p>Individual can comprehend, explain and analyze information from a variety of literacy works, including primary source materials and professional journals; can use context cues and higher order processes to interpret meaning of written material. Writing is cohesive with clearly expressed ideas supported by relevant detail; can use varied and complex sentence structures with few mechanical errors.</p>	<p>Individual can make mathematical estimates of time and space and can apply principles of geometry to measure angles, lines and surfaces; can also apply trigonometric functions.</p>	<p><b>Individual is able to read technical information and complex manuals; can comprehend some college-level books and apprenticeship manuals; can function in most job situations involving higher order thinking; can read text and explain a procedure about a complex and unfamiliar work procedure, such as operating a complex piece of machinery; can evaluate new work situations and processes, can work productively and collaboratively in groups and serve as facilitator and reporter of group work. The individual is able to use common software and learn new software applications; can define the purpose of new technology and software and select appropriate technology; can adapt use of software or technology to new situations and can instruct others in written or oral form on software and technology use.</b></p>

## Outcome Measures Definitions

### Educational Functioning Level Descriptors—English-As-A-Second Language Levels

Literacy Level	Speaking and Listening	Basic Reading and Writing	Functional and Workplace Skills
<p><b>Level 7</b> <b>Beginning ESL Literacy</b></p> <p><b>Pre-test Scores:</b> CASAS Reading: &lt;=180 CASAS Listening: &lt;=180</p> <p><b>Completion Benchmarks:</b> CASAS Reading: &gt;180 CASAS Listening: &gt;180</p>	<p>Individual cannot speak or understand English, or understands only isolated words or phrases.</p>	<p>Individual has no reading or writing skills in any language. May be able to recognize and copy letters, numbers and a few words (e.g. own name). May have little or no comprehension of how print corresponds to spoken language. Individual may have difficulty using a writing instrument.</p>	<p>Individual functions minimally or not at all in English and can communicate only through gestures or a few isolated words. May recognize only common words, signs or symbols (e.g. name stop sign, product logos). Can handle only very routine entry-level jobs that do not require oral or written communication in English. May have no knowledge or use of computers.</p>
<p><b>Level 8</b> <b>Low Beginning ESL</b></p> <p><b>Pre-test Scores:</b> CASAS Reading: 181-190 CASAS Listening: 181-190 CASAS Writing: 136-145</p> <p><b>Completion Benchmarks:</b> CASAS Reading: &gt;190 CASAS Listening: &gt;190 CASAS Writing: &gt;145</p>	<p>Individual can understand basic greetings, simple phrases and commands. Can understand simple questions related to personal information, spoken slowly and with repetition. Understands a limited number of words related to immediate needs and can respond with simple learned phrases to some common questions related to routine survival situations. Speaks slowly and with difficulty. Demonstrates little or no control over grammar.</p>	<p>Individual can read numbers and letters and some common sight words. May be able to sound out simple words. Can read and write some familiar words and phrases, but has a limited understanding of connected prose in English. Can write basic personal information (e.g., name, address, telephone number) and can complete simple forms that elicit this information</p>	<p>Individual functions with difficulty in social situations and in situations related to immediate needs. Can provide limited personal information on simple forms, and can read very simple common forms of print found in the home and environment, such as product names. Can handle routine entry level jobs that require very simple written or oral English communication and in which job tasks can be demonstrated. May have limited knowledge and experience with computers.</p>

## Outcome Measures Definitions

### Educational Functioning Level Descriptors—English-As-A-Second Language Levels

Literacy Level	Speaking and Listening	Basic Reading and Writing	Functional and Workplace Skills
<p><b>Level 9</b></p> <p><b>High Beginning ESL</b></p> <p><b>Pre-test Scores:</b> CASAS Reading: 191-200 CASAS Listening: 191-200 CASAS Writing: 146-200</p> <p><b>Completion Benchmarks:</b> CASAS Reading: &gt;200 CASAS Listening: &gt;200 CASAS Writing: &gt;200</p>	<p>Individual can understand common words, simple phrases, and sentences containing familiar vocabulary, spoken slowly with some repetition. Individual can respond to simple questions about personal everyday activities, and can express immediate needs, using simple learned phrases or short sentences. Shows limited control of grammar.</p>	<p>Individual can read most sight words and many other common words. Can read familiar phrases and simple sentences, but has a limited understanding of connected prose and may need frequent re-reading.</p> <p>Individual can write some simple sentences with limited vocabulary. Meaning may be unclear. Writing shows very little control of basic grammar, capitalization and punctuation and has many spelling errors.</p>	<p>Individual can function in some situations related to immediate needs and in familiar social situations. Can provide basic personal information on simple forms and recognizes simple common forms of print found in the home, workplace and community. Can handle routine entry level jobs requiring basic written or oral English communication and in which job tasks can be demonstrated. May have limited knowledge or experience using computers.</p>
<p><b>Level 10</b></p> <p><b>Low Intermediate ESL</b></p> <p><b>Pre-test Scores:</b> CASAS Reading: 201-210 CASAS Listening: 201-210 CASAS Writing: 201-225</p> <p><b>Completion Benchmarks:</b> CASAS Reading: &gt;210 CASAS Listening: &gt;210 CASAS Writing: &gt;225</p>	<p>Individual expresses basic survival needs and participates in some routine social conversations, although with some difficulty. Understands simple learned phrases easily and some new phrases containing familiar vocabulary spoken slowly with repetition. Asks and responds to questions in familiar contexts. Has some control of basic grammar.</p>	<p>Individual can read simple material on familiar subjects and comprehend simple and compound sentences in single or linked paragraphs containing a familiar vocabulary. Individual can write simple notes and messages on familiar situations, but may lack variety in sentence structure, clarity and focus of writing. Shows some control of basic grammar (e.g., present and past tense) and spelling. Uses some punctuation consistently (e.g., periods, commas, question marks, capitalization, etc.).</p>	<p>Individual can interpret simple directions, schedules, signs, maps, etc. Completes simple forms but needs support on some documents that are not simplified. Can handle routine entry level jobs that involve some written or oral English communication but in which job tasks can be clarified orally or through demonstration. Individual may be able to use simple computer programs and can perform a sequence of routine tasks given directions (e.g., fax machine, computer).</p>

## Outcome Measures Definitions

### Educational Functioning Level Descriptors—English-As-A-Second Language Levels

Literacy Level	Speaking and Listening	Basic Reading and Writing	Functional and Workplace Skills
<p><b>Level 11</b></p> <p><b>High Intermediate ESL</b></p> <p><b>Pre-test Scores:</b> CASAS Reading: 211-220 CASAS Listening: 211-220 CASAS Writing: 226-242</p> <p><b>Completion Benchmarks:</b> CASAS Reading: &gt;220 CASAS Listening: &gt;220 CASAS Writing: &gt;242</p>	<p>Individual participates in conversation in familiar social situations. Communicates basic needs with some help and clarification. Understands learned phrases and new phrases containing familiar vocabulary. Attempts to use new language but may be hesitant and rely on descriptions and concrete terms. May have inconsistent control of more complex grammar.</p>	<p>Individual can read text on familiar subjects that have a simple and clear underlying structure (e.g., clear main idea, logical order). Can use word analysis skills and context clues to determine meaning with texts on familiar subjects. Individual can write simple paragraphs with main idea and supporting details on familiar topics (e.g., daily activities, personal issues) by recombining learned vocabulary and structures. Can self- and peer-edit for spelling, grammar, and punctuation errors.</p>	<p>Individual can meet basic survival and social demands, and can follow some simple oral and written instructions. Has some ability to communicate on the telephone on familiar subjects. Can write messages and notes related to basic needs and complete basic medical forms and job applications. Can handle jobs that involve basic oral instructions and written communication in tasks that can be clarified orally. Individual can work with or learn basic computer software, such as word processing, and can follow simple instructions for using technology.</p>
<p><b>Level 12</b></p> <p><b>Advanced ESL</b></p> <p><b>Pre-test Scores:</b> CASAS Reading: 221-235 CASAS Listening: 221-235 CASAS Writing: 243-260</p> <p><b>Completion Benchmarks:</b> CASAS Reading: &gt;235 CASAS Listening: &gt;235 CASAS Writing: &gt;260</p>	<p>Individual can understand and communicate in a variety of contexts related to daily life and work. Can understand and participate in conversation on a variety of everyday subjects, including some unfamiliar vocabulary, but may need repetition or rewording. Can clarify own or others' meaning by rewording. Can understand the main points of simple discussions and informational communication in familiar contexts. Shows some ability to go beyond learned patterns and construct new sentences. Shows control of basic grammar but has difficulty using more complex structures. Has some basic fluency of speech.</p>	<p>Individual can read moderately complex text related to life roles and descriptions and narratives from authentic materials on familiar subjects. Uses context and word analysis skills to understand vocabulary, and uses multiple strategies to understand unfamiliar texts. Can make inferences, predictions, and compare and contrast information in familiar texts. Individual can write multi-paragraph text (e.g., organizes and develops ideas with clear introduction, body, and conclusion), using some complex grammar and a variety of sentence structures. Makes some grammar and spelling errors. Uses a range of vocabulary.</p>	<p>Individual can function independently to meet most survival needs and to use English in routine social and work situations. Can communicate on the telephone on familiar subjects. Understands radio and television on familiar topics. Can interpret routine charts, tables and graphs, and can complete forms and handle work demands that require non-technical oral and written instructions and routine interaction with the public. Individual can use common software, learn new basic applications, and select the correct basic technology in familiar situations.</p>

## **11. APPENDIX III**

### **Documentation of Disabilities and Accommodations Follow-up Forms**

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## Documentation of Disability

*(To be completed for every learner identified as having a disability)*

**Student Name:** \_\_\_\_\_ **DOB:** \_\_\_\_\_

**Disability (list all)** \_\_\_\_\_

**Major life activity limited or restricted (Circle at least one): walking, seeing, hearing, speaking, learning, working, other (explain)** \_\_\_\_\_

**Evidence:** \_\_\_\_ Self-report; \_\_\_\_ Teacher observation; \_\_\_\_ IEP or psychological evaluation;  
\_\_\_\_ Letter from medical personnel licensed to diagnose the disability;  
\_\_\_\_ Other (explain) \_\_\_\_\_

**Name/Address of MD, psychologist, school district, and/or other diagnostic professional who conducted testing to determine disability:** \_\_\_\_\_

Accommodation	Date Initiated or Changed	Staff Initials

**If no accommodations are listed, a reason must be given:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Date form completed:** \_\_\_\_\_ **Completed by:** \_\_\_\_\_

**Learner's signature:** \_\_\_\_\_

**NOTE:** To evaluate the effectiveness and appropriateness of the accommodation(s) and/or services being provided to an individual with a disability, **follow up must be completed** and documented on the following form **at a minimum quarterly and/or more often as needed**. This information is **confidential** and is to be shared with all involved instructors. However, this form is not to be copied or released to others except by authorized personnel and with written approval of the learner.

