August 14, 2019

To: California Adult Education Program Consortium Directors and Members

From: California Adult Education Program Office

Subject: CAEP Program Areas – 18-19 Data Request

This memorandum is to advise Adult Education Program (CAEP) members of the California Adult Education Program (CAEP) requirements in the 2018–19 Program Year. This memorandum can also be found on the adult education website at https://caladulted.org/Administrators/22. Failure to comply with any requirements or deliverable deadlines will be cause for withholding Adult Education Program apportionment payments until the requirements are met.

Reporting Requirements
CAEP members that were active during the 2018-19 program year must submit the required 18-19 program and expenditure data by program area. The CDE and CCCCO requires all Adult Education Program agencies to use the NOVA systems for data submission in the following areas:

- All CAEP members (K12 districts, county offices of education, joint powers authority, and community college districts) must submit in NOVA the total hours of instruction for program year 18-19 provided to students in the seven CAEP program areas (adult education/noncredit).

- All CAEP members (K12 districts, county offices of education, joint powers authority, and community college districts) must submit in NOVA the total operational cost for program year 18-19 by fund source in the seven CAEP program areas (adult education/noncredit). Funds sources also include any fee revenue collected in 18-19.

 All data must be submitted in NOVA as follows:

- Each consortia member will be asked to **submit estimated amounts by September 1, 2019** into NOVA for the following:
    - Program Year 18-19 – hours of instruction by program area.
    - Program Year 18-19 – expenses by program area by fund source.

- Each consortia member will be asked to **certify actual amounts by December 1, 2019** in NOVA for the following:
    - Program Year 18-19 – hours of instruction by program area.
    - Program Year 18-19 – expenses by program area by fund source.

Due to the nuances of the K12 and the Community College systems, in order to complete these two exercises, we expect CAEP members to enter into NOVA their best estimate given the information/data from their local and state level systems. The CAEP Office encourages CAEP members to prorate when necessary if funding sources or programs overlap and/or are too difficult to separate.

NOVA Reporting Parameters: The State CAEP Office has set up a special reporting section in NOVA for the 18-19 hours of instruction by program area, and operational cost (or labeled leveraged funds) by program area. This is not to be confused with the CAEP quarterly expenditure reporting in NOVA. Please see the enclosed process steps for reporting the required 18-19 data in NOVA.

Data Accountability Training
The Adult Education Program Office has contracted with the Sacramento County Office of Education (SCOE) to create the Technical Assistance Project (TAP), which offers online and in-person trainings regarding a variety of topics, including meeting these specific Adult Education Program reporting requirements in the NOVA system. Past training sessions are available on the caladulted website at https://www.caadultedtraining.org/

A webinar regarding these reporting instructions and use of NOVA has been scheduled for Wednesday, August 21, 2019 from 12noon to 1pm. To register for this webinar please **click on the following link.**

Technical Assistance Contact Information
For questions related to the Adult Education Program and/or technical assistance on professional development topics, please contact the CAEP Technical Assistance Project (TAP) by phone at 1-888- 827-2324 or by e-mail at tap@aebg.org.

Sincerely,

Neil Kelly
Adult Education Program Office

Enclosure: Background information, Step by Step Instructions in NOVA, and FAQs

CAEP Background – Reporting in NOVA 18-19

data Adult Education Program Area Definitions

The AB104 legislation defines the seven Adult Education program areas as follows:

1. Programs in elementary and secondary skills, including those leading to a high school diploma or high school equivalency certificate.

2. Programs for immigrants in citizenship, ESL, and workforce preparation.

3. Programs for adults, including, but not limited to, older adults, that are primarily related to entry or reentry into the workforce. (**Starting in 19-20, this program area will be referred to as Workforce Preparation**).

4. Programs for adults, including, but not limited to, older adults, that are primarily designed to develop knowledge and skills to assist elementary and secondary school children to succeed academically in school.

5. Programs for adult with disabilities.

6. Programs in career technical education that are short term in nature with high employment potential.

7. Programs offering pre-apprenticeship training conducted in coordination with one or more apprenticeship programs approved by the Division of Apprenticeship Standards.

If you operate non-CAEP programs that overlap with your CAEP programs or CAEP courses that are designed for "credit" students, please pro-rate hours to include only courses in the seven CAEP program areas that are offered to adult education/noncredit students.

Hours of Instruction by Program Area
The term 'hours of instruction" is defined as any reportable individual that has at least one hour of program related instruction in our systems. **(New) The CAEP will be using the federal definition for instructional hours as follows:**

Contact hours are hours of instruction or instructional activity that the participant receives from the program. Instructional activity includes any program-sponsored activity designed to promote learning in the program curriculum, such as classroom instruction, assessment, tutoring, or participation in a learning lab. Time spent on assessment can be counted only if the assessment is designed to inform placement decisions, assess progress, or inform instruction. Time used simply to administer tests, such as the GED tests, cannot be counted as instructional activity.

https://www.nrsweb.org/sites/default/files/NRS_TA_Guide.pdf

New – **Beginning in the 19-20 program year, the CAEP will not track service hours. For NOVA Hours of Instruction by Program Area for 18-19, you may only report**

instructional program hours. For 18-19, if you cannot separate instructional hours from service hours, we will accept that data. However, for 19-20 reporting (in September 2020), the CAEP will not be tracking service hours, and the NOVA Program Area report must reflect that change.

The time period to report hours of instruction by program area is the 18-19 program year beginning July 1, 2018, and ending June 30, 2019. The amount of hours would be the total for the program year, by each CAEP program area.

To calculate an hour of instruction, please follow your agency accounting and fiscal policies that are used to report hours into your attendance system, and the state approved system. For community colleges, this would include the reporting of contact hours of approved curriculum through the official attendance reporting process. There are several suggested methods for gathering the total hours of instruction provided to students in the seven CAEP program areas.

1. Use the TOPSpro® Enterprise AEBG/CAEP 18-19 member reports by program area showing hours of instruction.

2. Use your local attendance system, provided that the system is collecting all student instruction hours, and displays the hours by the seven program areas.

3. Community college districts may wish to use their 18-19 Apportionment Attendance Reports generated from the CCFS-320 Reporting System for noncredit FTES.

   Note: Reports from the CCFS-320 Reporting System generate FTES not instructional hours. You will have to calculate the hours of instruction by multiplying the number of FTES by 525 hours. You will also need to develop a method of dividing the lump sum of hours into the various CAEP program areas, as the CCFS-320 Report does not separate data or FTES by program area. You cannot report non- CAEP program areas into NOVA. Colleges would need to develop a methodology for separating CAEP program data from non-CAEP program data.

Operational Costs
The term "operational costs" is defined as the true cost of running CAEP programs. This includes space, utilities, custodial, overhead, equipment, as well as the normal day-to-day operational costs (instructional, classified, benefits, supplies, etc.).

Operational costs also includes administrative costs, which would include administrators who oversee all areas of adult education/noncredit programs.

In some districts, some of these costs may be difficult to separate or identify specifically to the adult education/noncredit programs. We encourage districts to prorate these costs and use an allocation methodology that would estimate the true

cost of running the adult education/noncredit program.

Leveraged Funds by Program Area

Not only will districts enter the true cost of running CAEP programs, they will also enter into NOVA the various fund sources that contributed to these operational costs.

NOVA lists the six fund sources mandated in the AB104 legislation (see below) along with the California Adult Education Program funds. If a district's fund sources are also spent on non-CAEP related program areas, and it is difficult to separate between CAEP related and non-CAEP related funds, districts can prorate contributions for CAEP-related programs. This would also apply if revenue/funds were received for non-CAEP students – such as community services, community education, for-credit students, etc.

List of fund sources (Education Code 84916 (a-f)):

1. California Adult Education Program (CAEP formerly known as AEBG) – standard adult education apportionment for K12 districts, county offices of education, Joint Powers Authority, and community college districts.

2. CalWORKs – allocation to adult schools, county offices of education, regional occupational programs, and community colleges to provide education services to CalWORKs recipients.

3. Noncredit apportionment – standard noncredit apportionment to community colleges for serving students in noncredit courses and programs. This would not include noncredit programs outside of the seven CAEP program areas.

4. Perkins – federal grant to adult schools, county offices of education, regional occupational programs, and community colleges to improve career technical education programs, serve special populations, and meet gender equity needs for adult/noncredit students.

5. LCFF – local control funding formula (LCFF) is the process by which K12 school districts receive their allocations. K12 districts can incorporate K12 adult education into their local control and accountability plan, and support that with funding or in-kind resources.

6. K12 Adult Ed Jail Funds – the Jail Education Program or Adults in Corrections Program is a K12 adult education program that provides for the education of incarcerated adults at county jails in basic education, high school diploma, and English as a Second Language (ESL).

7. WIOA Title II – the Adult Education and Family Literacy Act under the Workforce Innovation and Opportunity Act, Title II, provides supplemental funds to K12 adult schools, county offices of education, community colleges, community-based organizations, health services, corrections, and libraries to assist adults in literacy, secondary, and post-secondary education and training. The programs also assists immigrants and other individuals who are English language learners.

(New) Beginning in the 19-20 program year, for this program area reporting exercise, the CAEP will only track the CAEP funds, the six fund sources listed in the AB104 legislation (see below), and fees and in-kind contributions as define by the WIOA II federal. Consortium may choose to have their members report additional fund sources if they so desire (but it is not required).

Title 2 Code of Federal Regulations (CFR) Part 200: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (Uniform Guidance). Please see the information below for more details and links regarding in-kind contributions and program income.

In kind Contributions (aligning with WIOA II / federal regulations)

Reporting expenditures of non-federal funds supporting WIOA, Title II: AEFLA programs is a grant requirement under Sections 222 and 241 of Public Law 113-128. Report quarterly the total fiscal funds received from the state and local governments used to support these programs. Under "Other Non-Federal and/or In-kind," report contributions such as: Cash and designated foundation grants or other non-federal awards used for AEFLA programs Buildings, land, and donated property–classroom space must be valued at the fair rental rate of the space Volunteer services valued at rates paid for similar work in the local agency Donated books and supplies valued at the market rate Utilities and property maintenance valued at the market rate Cost sharing of equipment valued at the fair rental rate All resources must be verifiable from the local agency records. Additional details are provided in The Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards. (2 CFR 300.306) * State General Funding: This encompasses any funds from the state budget used for Title II programs including funds from LCFF, AEBG, Charter School funds, Prop 98 money, state set aside funds for programs that fall within Title II.

https://www.ecfr.gov/cgi-bin/text-idx?SID=997b9bc1eeb1e71a99a78bd2d3b561b5&mc=true&node=se2.1.200_1306&rgn=div8

Program Income / Fees (aligning with WIOA II / federal regulations)

Program Income/fees reporting is a WIOA Title II: AEFLA grant requirement. Program income is defined as 2 CFR 200.80 as "gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance except as provided in §200.307 paragraph (f). (See §200.77 Period of performance.) Program income includes but is not limited to income from fees for services performed, the use or rental or real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with Federal award funds. Interest earned on advances of Federal funds is not program income. Except as otherwise provided in Federal statutes, regulations, or the terms and conditions of the Federal award, program income does not include rebates, credits, discounts, and

interest earned on any of them." (2 CFR 200.80) Fees reported must be reasonable and necessary, equitably administered, and must not reach levels that adversely affect the participation of economically disadvantaged students. California Statutory Requirement (Management Bulletin: July 1, 2016) While federal regulations allow program fees to be collected, the California statute is more restrictive and governs the implementation of the AEFLA grant for local education agencies (LEAs) in California. Under California Education Code Section 52612, school districts may generally charge adult fees for adult classes, with the exception of a "charge of any kind" for classes in English, Citizenship and elementary subjects; and a "fee charge" for high school classes (including high school equivalency classes) taken by an adult without a high school diploma. This exception does not apply to non-LEAs. Note: Agencies must expend all program fees collected prior to encumbering or expending AEFLA grant funds. Funds from program income/fees must be disbursed to the program for which the fees were collected within the program year.

https://www.ecfr.gov/cgi-bin/text-idx?SID=997b9bc1eeb1e71a99a78bd2d3b561b5&mc=true&node=se2.1.200_1307&rgn=div8

Frequently Asked Questions

Q: This will be extremely difficult to separate some of my fund expenses as I receive a grant that combines several programs.

A: We expect CAEP members to enter into NOVA their best estimate given the information/data from their local and state level systems. The CAEP Office encourages CAEP members to prorate when necessary when funding sources or program overlap and are too difficult to separate. You can also use your attendance system or TOPSPro to calculate a percentage model that could also assist in separating the funds.

Q: My college 320 report includes noncredit programs that are not one of the CAEP program area. I don't know how to separate them out?

A: Feel free to use your attendance system and/or the TOPSPro system that collects program services and instructional hours to prorate the amount that you think reflects the hours for that program area.

Q: I am at the adult school. Should we use ASAP reporting or TE reporting to complete instructional hours in NOVA?

A: The district has several options. We suggest that the district compare the two reports and enter the most accurate information into NOVA.

Q: Per the NOVA webinar, we need to report instructional hours by CAEP program. How are we meant to count this? Total hours of instruction offered (number of weeks * hours per week) or by contact time (number of hours attended)?

A: Please report the number of hours attended for the program year by CAEP program area. See the federal definition for contact hours in the attached memo.

Q: What are the differences between Short Term CTE, Workforce Reentry and Pre-Apprenticeship?

A: See the program area definitions as described in the AB104 legislation (and are listed in this document). If you are unable to breakout workforce reentry, pre-apprenticeship, or short term CTE, you may report them all under CTE.

Q: I cannot find the fund sources on the NOVA screen for the California Adult Education Program, and In-kind Contributions. Where are they in NOVA?

A: The California Adult Education Program and In-kind Contributions are listed in the Leveraged Funds by Program Area menu, but under the "Add Another Fund" tab. Just click on "Add Another Fund" and select the California Adult Education Program or In-kind Contributions. Press "Add Selected Fund" to add that fund to

the Leveraged Fund Section.

The other selections (Contracted Services, WIOA I / ITAs, Donations, Strong Workforce, Community College Supportive Service, Other Federal Grants, Other State Grants) are optional and are not required to be completed for state reporting (but some consortia may wish to continue reporting them for internal purposes).

Q: How do we track hours of instruction for integrated courses (ESL/CTE, ASE/CTE, ABE, CTE, etc.)?

A: For K12/COEs - if a class is identified as integrated, the hours will be divided equally between the programs designated for that record. If not integrated or if the hours are split unevenly – the agency can create two classes, one for each instructional program represented.

For Colleges - additional exploration is required to review how colleges are coding such courses.

Q: I went into NOVA and accessed the Program Area Reporting, but it shows it was already submitted. How can that be?

A: It appears you may have selected 17-18 as the program year. The Program Area Reporting for 17-18 was submitted last program year. Please remember to select the **18-19 year** from the drop down menu in NOVA.

NOVA Program Area Reporting Guide

Step 1: Once you log into NOVA, click on Funds (located on the blue navigation pane on the left hand side), next click on AEBG, and then click on Program Area Reporting. This will direct you to the Program Area Reporting Dashboard, as shown in the screenshot below. You can use the filters located at the top of the screen to locate your consortium. Remember to select the appropriate year. For this current exercise, we are reporting on the **2018-19 program year**.
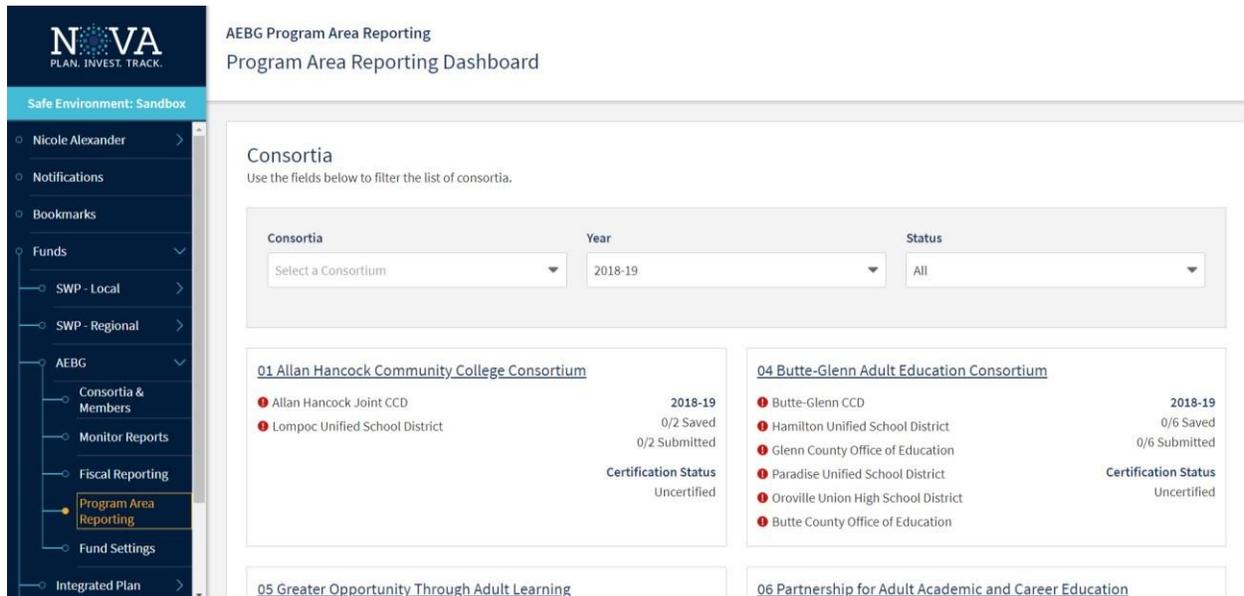
Step 2: Click on your consortium, which will direct you to the Member Agency Program Area Reports, as shown in the screenshot below. Be sure that you have selected the correct reporting year in the filter located at the top of the screen.
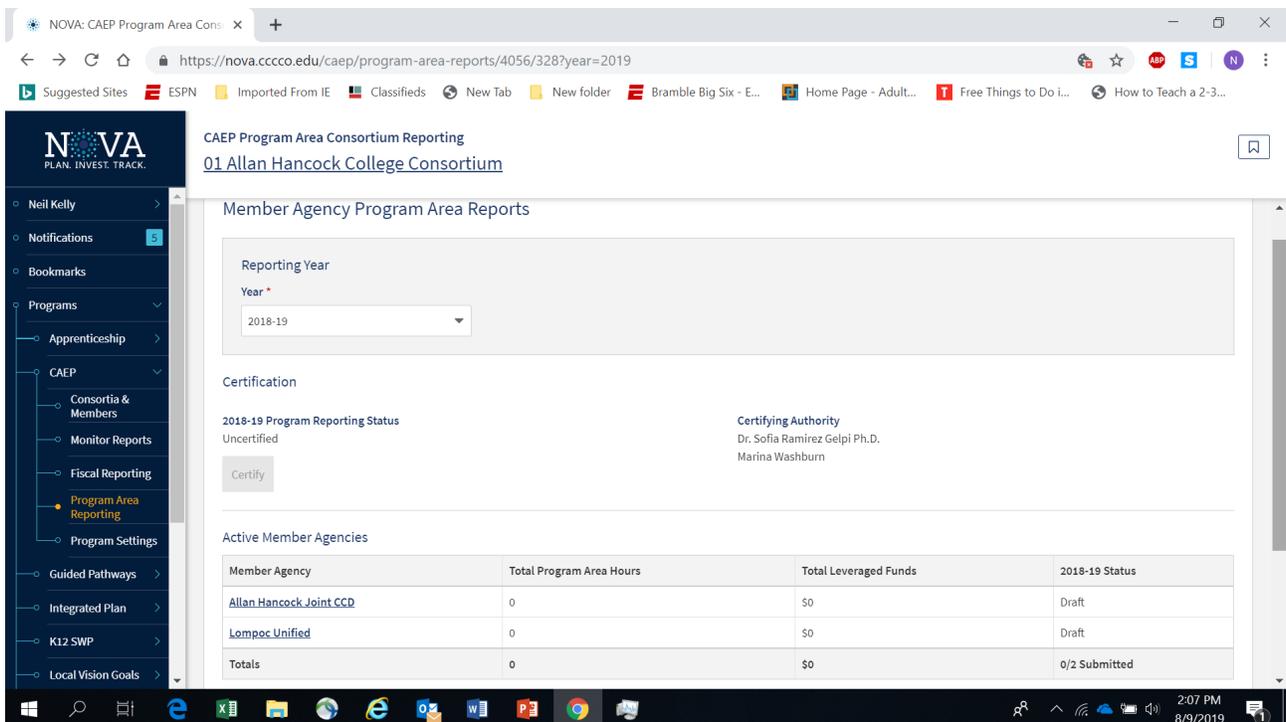
Step 3: Find your member agency and click on the link. This will direct you to the workflow steps to complete this report, which includes the Program Area Hours, Leveraged Funds, and Preview section. In the Program Area Hours section, enter the hours of instruction totals for the year for each program area.

AEBG Program Area Reporting: 2017-18
Allan Hancock Joint CCD
01 Allan Hancock Community College Consortium

Status: Draft

Next

Workflow

Program Area Hours
• Not started

Leveraged Funds
○ Not started

○ Preview

Program Area Hours

Hours of Instruction
Enter Hour of Instruction totals for the year broken up for each Program Area.

AEBG Program Area	Q1 - Q4 Hours of Instruction
ABE/ASE	0
ESL/El Civics	0
AWD	0
K12 Success	0
Short Term CTE	0
Workforce Reentry	0
Pre-Apprenticeship	0
Total	0 Hours

Step 4: Next click on the Leveraged Funds section and enter expense totals for each fund broken up by program area.

CAEP Program Area Reporting: 2018-19
Allan Hancock Joint CCD
01 Allan Hancock College Consortium

Status: Draft

Next

Workflow

Program Area Hours
○ Completed

Leveraged Funds
• Completed

○ Preview

Leveraged Funds

Leveraged Funds by Program Area
Enter expense totals for each Fund broken up by Program Area.

Fund	ABE/ASE	ESL/El Civics	AWD	K12 Success	Short Term CTE	Workforce Reentry	Pre-Apprenticeship	Totals
CalWORKs	$0	$0	$0	$0	$0	$0	$0	$0
NonCredit	$0	$0	$0	$0	$0	$0	$0	$0
Perkins	$0	$0	$0	$0	$0	$0	$0	$0
LCFF	$0	$0	$0	$0	$0	$0	$0	$0
Fees	$0	$0	$0	$0	$0	$0	$0	$0
K12 Adult Ed Jail Funds	$0	$0	$0	$0	$0	$0	$0	$0
WIOA II	$0	$0	$0	$0	$0	$0	$0	$0

11

To add an additional fund not shown on this list, select a new fund from the drop-down list under the 'Add Another Fund' section.

Step 5: Once you have completed the Program Area Hours and Leveraged Funds sections, click on the Preview section. Review your submission and click on the 'Save Estimates' button when you are ready to submit*.

When you are ready to submit your district's actual totals, follow the same process as outlined in the steps above, and click on the 'Submit Actuals' button.

Step 6: Consortium Lead Certification

Once all members have submitted their 'Actuals' reports, the consortium primary contact should navigate to the Member Agency Program Area Reports section and click on the Certify button, as shown in the screenshot below.