

1 **TEXAS WORKFORCE COMMISSION**
2 **Adult Education and Literacy Letter**

ID/No:	AEL 06-18, Change 1
Date:	August 13, 2019
Keyword	AEL; TANF
Effective:	July 1, 2019

3 **To:** Adult Education and Literacy Grant Grantees
4 Local Workforce Development Board Executive Directors
5 Commission Executive Offices
6 Integrated Service Area Managers

7 

8 **From:** Courtney Arbour, Director, Workforce Development Division

9 **Subject:** **Adult Education and Literacy Temporary Assistance for Needy Families**
10 **Eligibility—Update**

12 **PURPOSE:**

13 The purpose of this updated AEL Letter is to provide Adult Education and Literacy
14 (AEL) grantees¹ with current guidance regarding Temporary Assistance for Needy
15 Families (TANF)–funded AEL activities and eligibility determination.

16
17 This AEL Letter clarifies that AEL grantees no longer are required to document TANF
18 eligibility for individuals seeking AEL services.

19
20 **RESCISSION:**

21 AEL Letter 06-18, Change 1, rescinds and replaces AEL Letter 06-18, issued on
22 September 20, 2018. Attachment 1 summarizes the substantive revisions made in this
23 change letter.

24
25 **BACKGROUND:**

26 The AEL TANF eligibility guidelines listed in Section 4: Eligibility, 4.1.4 Temporary
27 Assistance for Needy Families (TANF), of TWC’s contracts awarded under Request for
28 Proposals (RFP) 320-18-01, Attachment A, outline the purpose of TANF-funded AEL
29 activities for needy parents and noncustodial parents, including information about the:

- 30 • provision of education and workforce training activities that help participants find
31 employment and support their children; and
 - 32 • documentation requirements for TANF eligibility, as outlined in Section 4.2 of
33 TWC’s contracts awarded under RFP 320-18-01.
- 34

¹ For the purposes of this AEL Letter, AEL grantees are entities that receive AEL funds through the Texas Workforce Commission (TWC).

1 Beginning with AEL Program Year 2019 (PY'19), demonstration of TANF eligibility for
2 AEL participants will be accomplished through a TWC data-matching process, which
3 will relieve AEL providers of the responsibility for collecting and maintaining
4 documentation on individual TANF eligibility.
5

6 **PROCEDURES:**

7 **No Local Flexibility (NLF)**: This rating indicates that AEL entities must comply with
8 the federal and state laws, rules, policies, and required procedures set forth in this AEL
9 Letter and have no local flexibility in determining whether and/or how to comply. All
10 information with an NLF rating is indicated by “must” or “shall.”
11

12 **Local Flexibility (LF)**: This rating indicates that AEL entities have local flexibility in
13 determining whether and/or how to implement guidance or recommended practices set
14 forth in this AEL Letter. All information with an LF rating is indicated by “may” or
15 “recommend.”
16

17 **TANF Eligibility**

18 **NLF**: AEL grantees must be aware that, beginning July 1, 2019, TWC will demonstrate TANF
19 eligibility for AEL participants by data matching using extant databases.
20

21 **Budgeting and Expenditure Reporting**

22 **NLF**: For Year 2 of contracts awarded under RFP 320-18-01, AEL grantees must be aware that
23 as a result of the TWC TANF data-matching process, TWC created an “AEL Combined”
24 funding designation, as shown in Attachment B-1 of Year 2 contracts, which consists of a
25 mix of federal Adult Education and Family Literacy Act (AEFLA) funds, associated state
26 matching funds, and federal TANF funds. Grantees must use the AEL Combined funding
27 designation rather than individual funding streams when budgeting and reporting AEL
28 expenditures for administration, infrastructure costs, professional development, training
29 costs, corrections institutions costs, and other program costs. The AEL Combined
30 funding designation also includes amounts reserved for performance-based funding.
31 English Literacy and Civics will remain a separate cost category.
32

33 **NLF**: For Year 2, AEL grantees must be aware that the expenditure reports showing
34 unexpended PY'18 TANF funds that roll over to PY'19 are modified to include AEL
35 Combined cost categories for reporting unexpended budget balances from PY'18.
36

37 **Enrollment and Intake Modification to Support Data Matching**

38 **NLF**: AEL grantees must be aware that the TANF data-matching process requires a sufficient
39 number of AEL participant SSNs to match against external needs-based program data.
40

41 **NLF**: AEL grantees must modify their current enrollment forms, intake, and data entry
42 processes to ensure that staff requests SSNs at intake as described in AEL Letter 02-19,
43 entitled “Collection of Certain Participant Information for Performance Reporting,” and
44 subsequent issuances.

1 **Documentation**

2 **NLF**: AEL grantees must be aware that beginning July 1, 2019, the TANF data-matching
3 process will replace the need for grantees to collect TANF eligibility information for
4 individuals enrolling in AEL services on or after that date. Eligibility documentation is
5 still required for TANF participants served before the effective date of this AEL Letter
6 and must be securely maintained. Maintenance of these eligibility files must conform to
7 TWC’s policy for Security of Personal Identity Data requirements as stated in WD Letter
8 13-08, issued April 1, 2008, and entitled “Security of Personal Identity Data”; WD Letter
9 02-18, issued March 23, 2018, and entitled “Handling and Protection of Personally
10 Identifiable Information and Other Sensitive Information”; AEL Letter 02-19, issued
11 August 8, 2019, and entitled “Collection of Certain Participant Information for
12 Performance Reporting”; and subsequent issuances. Failure to determine and document
13 eligibility or to maintain the required files for all enrolled participants before July 1,
14 2019, may result in disallowed costs and consequent repayment of grant funds.

15 **INQUIRIES:**

16 Send inquiries regarding this AEL Letter to aelpolicy.clarifications@twc.state.tx.us.

17
18 **ATTACHMENTS:**

19 Attachment 1: Table of Substantive Revisions to AEL Letter 06-18

20 Attachment 2: Revisions to AEL Letter 06-18 Shown in Track Changes

21
22 **REFERENCES:**

23 Adult Education and Family Literacy Act

24 Texas Workforce Commission Contracts under Request for Proposals No. 320-18-01

25 WD Letter 13-08, issued April 1, 2008, and entitled “Security of Personal Identity Data”

26 WD Letter 02-18, issued March 23, 2018, and entitled “Handling and Protection of
27 Personally Identifiable Information and Other Sensitive Information”

28 AEL Letter 02-19, issued August 8, 2019, and entitled “Collection of Certain Participant
29 Information for Performance Reporting”