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# **Employment Preparation Education Manual**

**Any questions or concerns regarding this manual  
may be directed to [EPE@NYSED.gov](mailto:EPE@NYSED.gov) and the  
Regional Team will respond.**

To assist with a clear understanding of the language in this manual, please refer to the following list of acronyms used throughout the manual:

<b>Acronym</b>	<b>Meaning</b>
ABE	Adult Basic Education
AEPP	Adult Education Programs and Policy
ASE	Adult Secondary Education
ASISTS	Adult Student Information System and Technical Support
BOCES	Boards of Cooperative Educational Services
CASAS	Comprehensive Adult Student Assessment Systems
CoSer	Cooperative Services
CTE	Career and Technical Education
EEP	Education and Employment Plan
EPE	Employment Preparation Education
ESL	English as Second Language
FTE	Full Time Equivalent
GRASP	Giving Ready Adults a Study Program
HSE	High School Equivalency
IEP	Individual Educational Plan
ISRF	Individual Student Record Form
LEA	Lead Educational Agency
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NEDP	National External Diploma Program
NYRS	New York's Reporting System
NRS	National Reporting Service
NYSED	New York State Education Department
POP	Period of Participation
RAEN	Regional Adult Education Network
SED	State Education Department (NY)
SMART	Skills to Make Adults Ready to Succeed
TABE	Test of Adult Basic Education
WEP	Welfare Education Program
WIOA	Workforce Innovation Opportunities Act

## **Introduction**

In 1984, the New York State Legislature enacted the Employment Preparation Education Program (EPE) to provide State aid to public schools and Boards of Cooperative Educational Services (BOCES) to support adult education programs. The EPE program supports over 200,000 adults annually with more than \$90 million supporting adult literacy instruction for these students served by New York's public schools and BOCES. Statutory authority for EPE can be found under Sections 207 and 3602, Subsection 24 of Education Law and Sections 168.1-5 of the Regulations of the Commissioner of Education.

In 1995, the legislature amended the EPE legislation and EPE funds were capped at \$96.18 million. This manual was developed as a guide for EPE program administrators to assure compliance with the legislation.

## **Definition of EPE**

EPE is a program that provides state aid to public school districts and BOCES that offer educational programs for adults leading to a High School Equivalency diploma. To be eligible to generate EPE aid students must be 21 years of age or older without a U. S. high school diploma.

The school or BOCES must submit for NY State Education Department (NYSED) approval a Comprehensive Plan of Service detailing the programs that will be provided, the number of students to be served and the number of contact hours that are anticipated to be generated on an annual basis. The successful applicant will be given permission by the NYSED to generate an annual allocation which may be modified at an interim point.

The EPE aid formula is based on district wealth. A pupil wealth ratio is calculated based on the actual valuation of property in the district per pupil divided by the State average actual valuation per pupil.

EPE aid rates for individual districts are calculated based on data on file on May 15th of the base year and applied to the subsequent program year; the rates are published in August of each fiscal year. EPE aid is not subject to transition aid provisions, meaning that EPE aid is generated in addition to all other State aid received by the district. Information on current EPE rates and aid calculation for BOCES and school districts can be found at the State aid <https://stateaid.nysed.gov/>.

Reimbursement for EPE educational services provided is based on the number of contact hours that have been generated. A contact hour is defined as 60 minutes of instruction provided by a District or BOCES employed certified teacher per section 168.2(c) of the regulations of the Commissioner. For example, if one teacher has ten students in a class for one hour, ten contact hours would be generated. The teacher must be an employee of the school district or BOCES claiming the funds (ie. on the LEA payroll.) Reimbursement for contact hours will be calculated using NYSED's data management information system, Adult Student Information System and Technical Support (ASISTS). Any school district or BOCES that meets the criteria for new EPE programs will receive funding.

Educational agencies receive reimbursement based on a state aid formula that establishes an annual contact hour rate. EPE funds must be spent on the EPE program. EPE aid is one of several funding streams available to support educational programs for adults. EPE is administered through the office of Adult Education Programs and Policy (AEPP).

### **Exceptions to Student Eligibility Requirements:**

- Students who are 21 years of age or older and have been issued an Individual Education Plan (IEP) prior to 2014 or the NYS Career Development and Occupational Studies (CDOS) Commencement Credential.
- In 2001, New York State amended EPE legislation to allow the Commissioner of Education to set aside up to \$2.5 million to serve individuals 21 and above who have a high school diploma or a High School Equivalency diploma but "fail to demonstrate basic educational competencies" (section 168.6(b) of the regulations of the Commissioner). These students with a high school diploma or High School Equivalency diploma must score below Level 5 of the National Reporting System (NRS) for adult education on the approved NYSED assessments in either reading or math. These funds and students must be reported and tracked separately in ASISTS. Payments in excess of the amount identified in the award letter may be paid if funds are available, but in no instance will more than three percent (3%) of a claim be paid for students with a high school diploma or equivalency.

### **Programs That Generate EPE State Aid**

Programming eligible to generate EPE state aid are as follows:

1. Traditional adult literacy instruction (in person)
2. Distance Education for adults
3. Workplace Literacy (in person)
4. Career & Technical Education (CTE) (in person)
5. Work Experience programs (in person)

### **EPE Program Requirements General Requirements**

Employment Preparation Education programs must meet the following general requirements:

- All curricula must follow NYSED established frameworks. This means that curricula should be consistent with the College and Career Readiness Standards and targeted towards the achievement of National Reporting System goals and outcomes. Curricula should be maintained on site and be made available to NYSED during monitoring visits
- Instruction will be individually prescribed and paced in each class; the same individual prescription applies to all distance education programs with the exception of the first two packets created for each student, those may be generic, yet academic, in nature
- The following program requirements pertain to all English speaking students:
  - All will be given NRS required assessments in both reading and mathematics to determine their approximate skill level
  - Those who are deficient in basic skills will be provided instruction in reading, mathematics, and written communication

- All will be given standardized NRS/NYSED approved assessments that report scores in Educational Functioning Levels (NRS Levels 1 to 6) and which have forms for post testing at required intervals, or other such instruments approved by the Commissioner of Education
- Agencies are required to have a policy for students suspected of having a learning disability
- Individual administrative student folders will include information concerning attendance, testing and program needs. Student files must be housed in a locked file cabinet at the main program office at all times. The files should be accessible to teachers or they may choose to develop their own file if they are teaching at off-site locations however the administrative student file must remain secure at the main office of the EPE program. This file consisting of all of a student's records must be accessible for review and verification by NYSED upon request.

The mandatory elements of a student's file include:

- Individual Student Record Form (ISRF) issued annually by NYSED
- Assessment score sheets (for all pre and post-tests)
  - BEST 2.0 score sheet or electronic report (individual by student)
  - BEST Literacy scoring booklet
  - TABE test score sheet
  - HSE Exam Readiness Assessment score sheet (if applicable)
- Americans with Disabilities Act declaration
  - Original signature from student
- Education and Employment Plan (EEP)
  - Customized to student's entry literacy levels and goal selection
  - Updated at least quarterly
- To protect student privacy, all personal information, including data found on the Individual Student Record Form (ISRF) must be kept in a secure location and not available to the public
- Students in ABE, HSE or ESL classes must have at least 150 hours of instruction available to them in each fiscal year
- Education and Employment Plans (EEP) must be developed for individual students to address educational, employment, or personal goals aligned with the National Reporting System
- Each staff member (professional, clerical, and data) serving in the Employment Preparation Education program will complete a minimum of fourteen (14) hours of professional development provided through NYSED's RAEN system. This applies to individuals employed both full and part-time
- New teachers and administrators must attend programs offered by the RAEN specifically designed for working with the adult population.
- All students in academic programs must receive a pretest within the first 12 hours and must be post-tested. Students must be pre and post-tested on the TABE 11/12 series for ABE students and the BEST 2.0 (or subsequently BEST Literacy – see NYSED assessment policy) for ESL students. Post testing time frames must align with the current NYS Assessment Policy.
  - In no instance can EPE aid be claimed for students in academic programs

who are not pre-tested before 35 hours or are not post-tested before 300 hours after the pre-test. ASISTS will automatically deduct these hours from the total number of hours that can be claimed

- Programs will submit required data to the State Education Department consistent with the National Reporting System (NRS) for adult education. All programs must use ASISTS for this purpose. All data related to services provided under the EPE program must be entered into ASISTS, there are no exceptions.

### **Expectations for the Intake Process**

Programs may offer a comprehensive intake and orientation process to new students as they enter each program. The following is a summary list of the expectations for an EPE funded intake process. It is the responsibility of the program to cover each of these items during the intake process. The process may be separated into sections to accommodate scheduling, however each item must be included:

- Individual Student Record Form;
- Barriers to Employment explained and selected as appropriate;
- Assessments – purpose and need for testing explained;
- Administer required assessments;
- Funding - fiscal support for programs;
- Four Pathways to NY’s High School Equivalency;
- Fast Track programming opportunities;
- What does an HSE provide;
- Student Contract/Attendance Agreement;
- Case Management services available;
- Programming available (customized to each school or BOCES);
- CTE training available, possible credentials;
- Learning disability awareness and resources;
- Identification of program staff;
- Schedule of literacy classes;
- Distance Education screening (if available);
- Include student ambassadors;

The maximum number of contact hours permitted for this comprehensive intake process is twelve (12). Programs must have detailed records of the time spent and the activities offered to students.

All the activities listed above generate EPE state aid. Each hour spent by the student in the intake process must be documented. It is not acceptable to identify a block of time as a standard period (e.g. a 5-hour standard intake assessment block); recording student's attendance must be in real time. In ASISTS, the word “Intake” must appear in the class identification code for recording all intake hours.

Students generate EPE aid through an intake process when they begin with a program. Should the student be exited through ASISTS, if that same student returns for a second Period of Participation (POP) within the same fiscal year, the program must provide another intake process aimed specifically at updating the student’s record. The time spent in a subsequent second or possibly third intake process must be recorded in Instructional Activities coded as

POP 2 Intake or POP 3 Intake.

The contact hours for developing, modifying and updating EEPs can generate EPE aid when the time is provided by a teacher or case manager working directly with a student and documented accordingly. These hours are documented in ASISTS in a traditional class coded with CM in the identification code.

### **Traditional Adult Literacy Instruction**

Traditional adult literacy instruction must occur in a classroom setting and be taught by a certified teacher (K-12 or Adult Education certified) employed by the school district or BOCES. EPE aid is generated based on student contact hours or seat time. A minimum of 70 percent of course content in classes in which a student is enrolled in a given week must be academic. The following is a list of programs included in this category:

#### **Academic Programs**

- **Adult Basic Education (ABE)** – Instruction in reading, mathematics, verbal and written communication for students reading below NRS Level 5.
- **Adult Secondary Education (ASE)** – Instruction for students at or above NRS Level 5 that is specifically designed to prepare the student for the HSE test leading to a High School Equivalency diploma
- **English as a Second Language (ESL)** Instruction in listening, reading, oral and written communication for adults with limited English proficiency. Instruction is provided in English.
- **Family Literacy** – Family Literacy Programs incorporate activities that include interactive literacy activities between parents and their children. To generate EPE aid, the parents must be EPE eligible and attend teacher led instruction. Stand-alone non-academic programs are not allowed.

### **Distance Education Adult Education Programs**

Distance Education programs are those that are not conducted in a traditional classroom format. Traditional classroom instruction should be encouraged whenever possible. Only Distance Education programs approved by the NYSED in the successful applicant's comprehensive plan of service may be used to generate EPE aid. Eligible school districts and BOCES must have prior approval from NYSED to offer a Distance Education program. Required information includes: appropriate distance education screening, intake process and format, assessments, record keeping, documenting student activities, documenting teacher time, determining progress and completion, EPE Distance Education teacher training, and program duration.

The following is a list of NYSED approved Distance Education programs and the student populations they are intended for:

#### **Distance Education Programs**

- **GRASP** (Giving Ready Adults a Study Program): NRS Levels 4, 5 & 6
- **SMART** (Skills To Make Adults Ready To Succeed): NRS Levels 2, 3, and 4

- **ESL Distance Education:** NRS Level 3, 4, 5, and 6

### **In-Person Tutoring**

Students enrolled in Distance Education programs may receive up to three (3) hours of in-person tutoring per week (maximum 12 hours per month). Tutoring may be offered one on one or in classroom settings. These hours are claimed at the traditional rate and must be documented in ASISTS. Students may not be co-enrolled in traditional and Distance Education programs concurrently (at the same time). The exception to this is the three hours per week of tutoring.

## **Career & Technical Education (CTE) Courses**

### **NYSED/K-12 Accredited Course Requests:**

Schools and BOCES may apply for CTE courses to be added to their EPE applications. CTE courses that are eligible for reimbursement are those that have already been approved by the NYSED/K-12 CTE office. A list of those eligible CTE course can be found on <http://www.nysed.gov/common/nysed/files/current-nysed-approved-cte-programs.pdf>

Students enrolled in approved CTE classes may also be dual enrolled in literacy classes to generate EPE. CTE courses may be proposed for EPE funding two times per fiscal year; the initial application completed annually in May or in the month of November for approval and implementation in the second half of the fiscal year. These are the two opportunities for programs to add CTE courses for EPE funding.

### **Locally Accredited CTE Course Requests**

Schools or BOCES that are applying for reimbursement for CTE courses that have not been approved by the NYSED/K-12 CTE Office:

The school district or BOCES has the statutory and regulatory authority to offer occupational/career programs to adult populations under the oversight and accreditation of the local boards of education (without the need for additional NYSED program-level approval or oversight). The AEPP office is prepared to provide EPE funding to support these courses.

A signed attestation must be completed and signed by the Superintendent or District Superintendent as part of the application process.

Locally accredited CTE courses may be proposed for EPE funding two times per fiscal year; the initial application completed annually in May or in the month of November for approval and implementation in the second half of the fiscal year. These are the only two opportunities for programs to add CTE courses for EPE funding.

### **Work Experience Program**

Work Experience programs are unpaid, structured and supervised work activities/tasks for a maximum of 50 weeks (per student) in a public or private, profit or not-for-profit setting that enhances and supports a written Education and Employment Plan (EEP) for the adult student. In addition to the on-site work experience, the program must include traditional classroom



education comprising of at least 30 percent of the total program hours. To increase the likelihood of employment upon completion, however, a maximum of 50 percent of the classroom hours may be dedicated to job related activities. Agencies must submit the program design and curricula for the Work Experience program as part of the comprehensive plan of service. There is a lifetime enrollment limit of 50 weeks per student.

Classroom instruction for Work Experience generates EPE at the full contact hour rate. Work Experience generates EPE aid at 50 percent (50%) contact hour rate.

Additional expectations for a work experience program:

- The total of classroom hours plus the hours of Work Experience must be no more than 20 hours per week. Programs offering between 21 and 40 hours per week of combined classroom and work activities must request annually a waiver. Even with a waiver, the total program hours cannot exceed 40 hours per week,
- All students must have an EEP developed and in their folders,
- Classroom instruction must be at least 30 percent of the total program hours,
- Classroom instruction must be traditional academic programs, however, to provide the student with employment readiness, up to 50% of the classroom hours can be devoted to job related activities such as resume construction, job seeking skills, interview and employment soft skills,
- All Work Experience components must be coordinated, supervised or directed by an individual who meets state and local requirements for teacher certification and employed by the school district or BOCES. This individual must visit the site a minimum of one time per week.
- The student must be supervised while on the work site by an appropriate individual (employee, manager, owner, etc.) who will monitor the student's progress toward specific skills and goals, and is responsible for recording the student's daily attendance,
- Student folders must be kept documenting Work Experience attendance and related information such as work site visits and student progress,
- A system must be in place to track job placements resulting from the Work Experience program in addition to NRS follow up outcome data,
- All contact hours must be documented including individual student names, dates and hours generated,
- At the end of the Work Experience program, all students should have attained the employment/program goals stated in the material submitted for approval,
- Participation in Work Experience programs has a lifetime enrollment limit of 50 weeks per student.

For approval of a Work Experience programs, the following must be submitted:

- A curriculum which includes the traditional courses the student will take (agencies must be approved for all traditional components that are part of the Work Experience program).
- A description of the work site experience

- A description of the supervision process
- A description of the record keeping process
- The hours of each program component
- A letter from the employer outlining their agreement
- A plan to collect evidence that program completers have obtained a job, have gained job competencies or met specified goals

## **Reimbursement Formulas**

### **Traditional Formula**

The traditional EPE formula is used for all students attending programs described as Traditional and Career & Technical Education. This also applies to the classroom component of Work Experience and for the tutoring portion of Distance Education. All of these hours must be documented in ASISTS. Reasonable breaks are permitted (up to 15 minutes in length).

### **Distance Education Formula**

Claiming EPE aid in Distance Education programs is based on the number of packets a student returns completed. Each two-week packet that is completed and returned is recorded as a “2” in the students attendance record in ASISTS; when the student completes a second packet in the same month, a “4” is recorded in that month for attendance signaling that two packets were completed and returned. Attendance must not be recorded until the packets are returned by the student. A student may take longer than the prescribed two weeks to complete a packet, however the packet is counted as two weeks of completed work regardless and a “2” is recorded in ASISTS regardless of how long the student may have needed to complete the work in the packet. If the teacher assesses the student’s work and determines it was too much or too difficult for him/her, the teacher may adjust the amount of work provided in the next packet prepared for that student.

The maximum packets per month permitted per student is two per month. ASISTS will automatically multiply each 2 or 4 by six hours to calculate the total number of contact hours that will be reimbursed to the program representing completed packets. All Distance Education programs conform to a two-week packet model in which a teacher assigns academic assignments anticipating the student will need an approximate two week period to complete the work. Packets can be paper or electronic depending on the Distance Education program and are customized to the needs of the individual student. Approval for each type of program rests with NYSED.

The first two packets may be designed as a generic introduction to the academic needs of students falling within the NRS range for which the distance education program is designed. Each subsequent packet must be customized to meet student’s individual educational needs. Reimbursement formula for Distance Education is also based on teacher time dedicated to developing the packets for students as described below:

- The maximum number of instructional hours that is allowed is 30 minutes (.5 hour) per week for each actively enrolled student. Example: a teacher that works 20 hours per week is able to create packets for a total of 40 students being served in a two week period.

Documentation of student work must be kept for work completed in each packet.

- Regardless of the record in ASISTS, programs must conform to the requirements for record keeping in Distance Education programs.
- For each completed packet, the program must have either paper or electronic copies of the follow three documents:
  - AEPP EPE Student Packet Assignment (1 per packet)
  - AEPP EPE Student Work Time Record (1 per packet)
  - AEPP EPE Teacher Assignment Log (1 per month per student)
- All teachers must be certified by AEPP to provide distance education programs and have specific and appropriate training available through the RAEN. For continuity and to maintain a consistent level of quality, it is recommended that program administrators also participate in EPE Distance Education training.
- All Distance Education programs must have the following components:
  - A screening process for remote learning,
  - An in-person intake process including the development of an Education and Employment Plan (EEP),
  - A procedure for reviewing the student work and progress. The teacher must keep detailed records of hours of instruction provided (i.e. reviewing, correcting, or handling student materials, planning, etc.).
  - All testing must be done in person, this pertains to both pre and post testing.

### **EPE in County Correctional Facilities**

EPE aid can only be generated by programs operating within eligible school districts and county and municipal correctional facilities. EPE programs may not be operated in federal prisons or in New York State Department of Corrections and Community Supervision.

### **HSE Testing**

HSE testing cannot generate EPE aid. If NYSED determines that there is a severe shortage of public HSE testing in a region of the state, NYSED may grant an annual waiver to an EPE provider who is both

- a) a public testing center, and
- b) operates an adult EPE funded HSE preparation program

Such waiver will allow the EPE provider to generate EPE hours on eligible HSE preparation students referred from their own preparation program, public testers, or HSE preparation students referred from other preparation programs in their local proximity. The limit for generation of EPE hours is 1 percent (1%) of the EPE providers' prior years' EPE accrual (to calculate maximum HSE reimbursement, take 1% of the program's EPE contact hour accrual).

A school district or BOCES may continue to claim EPE reimbursable contact hours for students who have taken the HSE test up until the program is credited with that student's diploma through the electronic data match between ASISTS and the NYSED/HSE department. For a student who achieves the NYS HSE while enrolled in an approved CTE class, the student may complete that CTE class and the attendance hours in that CTE class will be reimbursed.

## **Fast Track Programming under EPE:**

Repurposing of EPE State Aid:

\$20 million in EPE State Aid that has been removed from the match for federal Workforce Innovation Opportunities Act (WIOA) funds and will be used to focus on three (3) distinct initiatives:

- Fast Track High School Equivalency (HSE) preparation;
- National External Diploma Program (NEDP) High School Equivalency programming;
- NRS Level 1 ABE students as determined on the TABE 11 & 12 assessment.

Proportionate distribution of these monies for these initiatives will be determined by NYSED.

Program managers should note that while these three specific initiatives are supported by EPE State Aid, students enrolled in any one of these programs are exempt from National Reporting System (NRS) guidelines. Accountability performance measures for these three areas of programming will be reported under New York's Reporting System. An annual performance report is generated directly from ASISTS reporting measurable educational gain and HSE diploma attainment statistics relative to the Fast Track programming.

Program managers must also be reminded that should students in any one of these three areas be additionally enrolled in any portion of traditional programming that falls under the NRS guidelines, those students will then be included in all NRS reports. This situation can occur when a WIOA or EPE funded student is co-enrolled in either Fast Track, NEDP, or is an NRS Level 1 student enrolled in some other NYSED funded activity.

## **Fast Track High School Equivalency Programming:**

The four objectives of this initiative are to:

1. Connect more walk-in examinees who were unsuccessful on the HSE exam with HSE preparation programs
2. Build short-term, intense ("Fast Track") instructional opportunities for test takers or students who score between 300-500 on the HSE exam or do not show probable success on the HSE readiness assessment
3. Significantly raise HSE math sub-test pass rates across the state, and
4. Significantly increase the effectiveness of HSE preparation throughout the state.

NYSED, has identified promising Fast track strategies that can be supported under the \$20 million EPE HSE initiative. The following list of strategies are intended to identify and support instruction focused on HSE preparation, especially math:

- Outreach to HSE testing centers to recruit adults (age 21 or older) who do not succeed on HSE subtests:
  - Customized flyers disseminated to test examinees at HSE testing centers;
  - Network with NYS HSE Test centers to offer services to examinees that are not successful on any HSE subset;
- Short-term instruction options
  - Fast Track Math GRASP Distance Education packets\* (paper or electronic) utilizing the NYSED/CUNY eight (8) HSE math modules

for students choosing to learn from a distance education model. The eight modules are divided into Part I and Part II sections for a total of sixteen (16) sections.

- Packets are electronically stored on [www.Collectedy.org](http://www.Collectedy.org)
- Six (6) hour intense instruction sessions made available evenings and Saturdays in math, writing, reading, science, or social studies;
- Two x Two sessions where two subtest areas of instruction will be the focus;
- Test taking skills and strategies, including reduction of test anxiety;
- Computer based testing skills and strategies;
- Community outreach campaigns;
- Other customized Fast Track strategies designed by program staff (with prior NYSED approval)

For Fast Track students only:

1. No NRS requirement that students must attend 12 hours before they count;
2. No valid pre or post-test requirement;
3. No Measurable Skill Gain calculated (for NRS reporting);
4. No TABE testing requirement.
5. All participants must be tested with the HSE readiness assessment (only exception are those students who have already taken an HSE subtest and were not successful)
6. No employment follow-up for students/test takers; and
7. No requirement for HSE diploma recipients to have employment or postsecondary training within the first year after exit.

\*Fast Track Math GRASP Packets focus on those HSE test items that are well represented on the test:

NYSED invested in this project with CUNY to create eight modules which are divided into Part I and Part II sections for a total of sixteen (16) packets. The packets can be found at: [www.Collectedy.org](http://www.Collectedy.org). These packets may be utilized in traditional classroom settings or in a specific Fast Track GRASP Math Distance Education class facilitated remotely and utilizing these specially designed packets. The Fast Track GRASP math packets are downloadable or can be printed for the program or students' use.

To further incentivize the adoption and use of the modules, programs will signal that the student has mastered the skills within the packet by the teacher's signature on Appendix 6. When Appendix 6 is signed and submitted to the program manager, the program will claim 24 contact hours; a "4" will be recorded in ASISTS for the distance education formula. Students will also be allowed to attend tutoring sessions in traditional settings for up to 6 hours per week, face to face and in person. Students assigned the Fast Track Math GRASP packets may be concurrently enrolled in traditional instruction or in either of the NYSED EPE distance education programs, GRASP or SMART. In these cases, the combined total tutoring time for students is 6 hours per week. It should be noted that once a teacher has signed an Appendix 6 for any student, signaling the student has mastered the skills contained in that packet, that same packet may not be claimed a second time at any point in that students enrollment, regardless of how many fiscal year the student remains

enrolled.

**Additional Fast Track requirements:**

Programs must demonstrate the ability to provide intense case management services to adults included in any of these initiatives.

The following customized performance metrics will be used to report student outcomes and to render an addendum NYS Report Card focused on this Fast Track programming.

Customized performance metrics include:

- the number of adults recruited from walk-in HSE testing
- the number of instructional hours offered to students
- the number of contact hours accrued per student
- the number of case management hours dedicated to supporting students
- the demographic data collected on each participant
- the number of HSE readiness scores for each participant recorded in ASISTS
- the number of HSE-Test Application Forms (T-TAF) submitted to NYSED
- the number of participants passing the HSE math sub test
- the number of participants passing any HSE sub test
- the number of participants achieving the NYS HSE diploma

**National External Diploma Program (NEDP)**

The National External Diploma Program (NEDP), administered through Comprehensive Adult Student Assessment Systems (CASAS), is an NYSED pathway to the New York State High School Equivalency diploma. It is a competency based program that allows adults to demonstrate transferable skills for which a High School Equivalency (HSE) diploma (as per CR. 100.8) is awarded as approved by the New York State Board of Regents in May, 2016.

The NEDP program is offered specifically under EPE Fast Track funding. Comprehensive information for this program can be found on: <http://www.acces.nysed.gov/hse/national-external-diploma-program>

NEDP is a flexible, self-directed, web-based program where the reading, writing, math, and workforce readiness skills of participants are assessed through a series of tasks to earn a NYS HSE diploma. Tasks are meant to demonstrate high school level skills that parallel job and life situations. Participants work independently on a computer and meet with an advisor/assessor from the EPE funded program on a regular basis. NEDP is aligned to the Career and College Readiness Standards. The NEDP program does not require students to take any timed, high-stakes tests. Programs interested in offering NEDP should contact the HSE department at NYSED and refer to the NEDP website: <http://www.acces.nysed.gov/hse/national-external-diploma-program>. Interested programs receiving EPE state aid funding must include NEDP in their EPE application every fiscal year. A request to attain EPE funding for NEDP programming may only be made as part of the initial EPE annual application; intermittent requests are not permitted during the fiscal year.

**Contact Hour Accrual for NEDP**

- Hours are claimed for a one-time only intake assessment (CASAS) to determine

student readiness for NEDP. Reimbursement uses the traditional EPE formula and should be recorded in a traditionally coded class named as “NEDPIntake”. The maximum number of contact hours allowable for Intake is 12.

- Hours are claimed for the NEDP orientation. Enter a 1 (one) for attendance in the week when the orientation occurs; the 1 (one) will automatically reflect 6 contact hours in ASISTS. This should happen only once and be coded correctly in ASISTS.
- Hours may be claimed for weekly Face-to-Face Generalized Assessment sessions. Enter a 1 (one) for attendance in the week when the meeting occurs; the 1 (one) will automatically reflect 6 contact hours in ASISTS.
- When the NEDP program staff have completed a review of a student’s work in each of eight competency categories and it is determined that the student has successfully mastered the competencies associated with each category, the program will claim twenty (20) contact hours for that completed competency category. These twenty hours will be recorded in a class, coded under traditional instruction, in ASISTS. When a student has mastered the competencies associated with all eight (8) categories, the program will have earned a total of eighty (160) reimbursable contact hours.
  - Eight Competency Categories:
    1. Cultural Literacy
    2. Health Literacy
    3. Civic literacy and Community Participation
    4. Geography and History
    5. Consumer Awareness
    6. Financial Literacy
    7. Science
    8. 21st Century Workplace
- 6 (six) hours per week are claimed for continued Assessment if the Portfolio Reviewer has determined that all competencies are not demonstrated at 100 percent mastery. Enter a 1 (one) in ASISTS. Process continues until the second and Final Portfolio Review is conducted.
- Students enrolled in the NEDP can receive a maximum of 12 (twelve) hours per week for in-person tutoring. These hours are recorded in ASISTS and coded as a traditional class. Tutoring instruction cannot be provided by NEDP staff who serve as the assessor/advisor to the student.

### **NRS Level 1 students:**

The next initiative NYSED has excluded from NRS guidelines under the repurposed \$20 million in EPE funding is the special attention given to NRS ABE Level 1 students. All programs that are supporting NRS Level 1 ABE under EPE funding exempt from NRS reporting. Note: These students will no longer show under contracted enrollments for funding under Workforce Innovation Opportunities Act (WIOA) as they will be in a separate cohort established to insulate them from NRS guidelines and will be included under NYRS reporting.

## **EPE Reimbursement Process**

### **Reimbursement Schedule**

EPE aid is reimbursed for services rendered in the previous period. The first period runs from July 1 through December 31. The second period runs from January 1 through June 30. All contact hours to be reimbursed must be entered into the ASISTS database, there are no exceptions.

The ASISTS database freezes program data after the first period is due and again when the second period is due. An SA 160.1, representing the first period claim, must be printed from ASISTS and emailed to [EPE@nysed.gov](mailto:EPE@nysed.gov) on a date set by NYSED. Publication of specific due dates is provided annually in the spring. Within ten business days the original hard copy SA160.1 must be signed by the Superintendent or District Superintendent and received by the adult education program office. Payments will be paid after April 1 by the State Aid office. Along with the first period claim, the program must project the number of contact hours for the entire fiscal year through June 30. NYSED may then adjust each program's allocation based on these projections.

NYSED may undertake a second reallocation process to ensure that all EPE funding is spent appropriately. NYSED will identify any EPE funded programs that are "at risk" for possible significant decreases/increases in student attendance. These programs will be notified. This new process will enable programs to use re-allocated funding to provide instruction to students prior to the close of the fiscal year. Big 5 School Districts (New York City, Yonkers, Syracuse, Rochester, and Buffalo) will automatically be included in this second reallocation process.

A SA 160.2 claim form for the second period (January 1 through June 30) must be emailed by a date in August set by NYSED. Within ten business days an original hard copy SA160.1 must be signed by the Superintendent or District Superintendent and received by the AEPP office. The second claim will be paid after October 1 by the State Aid office. Claims received after the due dates may not be reimbursed.



## State Budget Allocation for EPE

Of the total statewide allocation of EPE funds, only 25 percent is paid on first period claims. Agencies applying for reimbursement for first period EPE claims will only receive a prorated portion of the available funding. After the second period claim is filed and processed, two payments will be made, one for the balance of the first period claim and one for the entire second period claim; these payments come directly from the state aid office.

### Employment Preparation Education State Aid Claim Form SA 160.2

January 1, 202\_\_ through June 30, 202\_\_

#### Part 2. Claim Form and Enrollment Distribution for Students without a High School Diploma or Equivalent

Components	Claim Form January - June		Amendments July - December		Net Claim January - June +/- Amendments	
	Contact Hrs	Enrollment	Contact Hrs	Enrollment	Contact Hrs	Enrollment
<b>EPE</b>						
Line 1	Traditional Adult Education	11,642.50	404	7.00	2	11,649.50 406
Line 2	Distance Learning Education	26,568.00	336	-12.00	1	26,556.00 337
Line 6	TOTAL	38,210.50	740	-5.00	3.00	38,205.50 743.00

All additions to the first reporting period made after the mid-year deadline must be explained in the EPE Amendment Log located in ASISTS (see screen shot below for location of the EPE log)

The screenshot shows the ASISTS web application interface. At the top, there is a navigation bar with tabs: Home, Program Information, Student Information, Instructional Activity, and Management Reports. Below this, a dropdown menu is open, showing options: Agency Information, Personnel Information, Staff Development, Edit EPE Amend Log, and Edit EPE Amend Log. The 'Edit EPE Amend Log' option is circled in red. Below the dropdown, a modal window titled 'Add EPE Log' is displayed. It contains a 'New Amendment' form with the following fields: Date of Amendment (text input), Staff Making Change (text input), Category Changed (dropdown menu), Nature of Change (text input), Reason for Change (text input), Line Affected on Claim Form (dropdown menu), and Expected Change in Hours (text input). At the bottom of the form are 'Insert' and 'Cancel' buttons, and a 'Close' button at the bottom right of the modal.

## Claims in Excess of Allocation

An agency may have a higher level of enrollment or greater attendance than was allocated and will generate more EPE aid than was approved in the annual application or approved through the SA160.1 interim reallocation. In these instances, agencies are encouraged to submit the claim for the total amount of EPE aid generated. Should EPE funds remain after all claims are processed in

a fiscal year, these funds will be used to reimburse agencies that have exceeded their EPE aid allocation. There is no guarantee that contact hours in excess of the initial or revised allocation will be reimbursed.

## **Revenues and Expenditures**

EPE law does not permit school districts or BOCES to receive more revenue in a fiscal year than they expend. Should this occur, NYSED is required to reduce the following year's EPE aid. After the payment of the final claim, NYSED State Aid office sends out a Final Expenditure Report for Employment Preparation Education Programs for the prior year. Upon receipt of the information, revenues are compared against expenditures. If the revenues exceed the expenditures, the overpayment will be deducted in the following year's payments.

## **Additional Information Concerning EPE Aid Calculation**

### **Collaboration with Volunteer Tutor Organizations**

In no instance can a volunteer tutor generate EPE aid. A volunteer tutor is defined as someone who is providing instruction but receives no compensation. In a traditional setting, a volunteer tutor can work with an adult student in the classroom while a certified teacher, employed by the school district or BOCES, is in the same room and overseeing the lesson. In a Distance Education setting, a volunteer tutor can work with adult students while they are completing their packets of instruction. In both cases, it is the time spent with a certified teacher working with the student that generates EPE aid. No additional EPE aid is generated by the use of volunteer tutors. The traditional or Distance Education programs must be approved and should stand alone with or without the involvement of the tutor (i.e. the program is not dependent on the involvement of the tutor for instruction.) No special approval is required to use volunteer tutors as part of an approved traditional or Distance Education program.

## **Other Requirements**

### **Facility Requirements**

EPE programs are designed to meet community needs, consequently, EPE programs may be offered in a number of different kinds of facilities. This includes locations such as churches, synagogues, libraries, community based organizations, civic centers, etc. It is necessary that the program be a part of the Comprehensive Plan of a BOCES or school district and that the teachers are only employed by that BOCES or school district and certified for the purpose of generating EPE. Four conditions apply to facilities used for instruction supported by EPE aid:

- The facility will be covered by fire and liability insurance,
- The facility meets all applicable State or local fire and safety standards,
- The facility has ample heating, lighting, and ventilation that are conducive to a learning environment,
- The facility will be accessible to students with disabilities.

## **Allowable Expenditures (this information should be shared with each BOCES or school district business office)**

### **EPE Generation versus Expenditures**

EPE reimbursement funds can only be spent on EPE related program expenses. There is a difference between the activities and program components that generate EPE aid and activities and program components for which EPE may be expended. Part 168.4 of Commissioner's Regulations defines allowable expenditures for EPE State aid as follows:

Employment Preparation Education program funds may be spent only for salaries, employee benefits, equipment, supplies and materials, contractual services (related to the EPE program), travel expenses for staff (ie: professional development and training), professional development and training, and other such expenditures approved by the Commissioner. Such expenditures shall be made only for Employment Preparation Education Program purposes.

### **Additional Expenditure Requirements**

In addition, the following applies to the use of EPE aid:

- Monies generated have to be spent in the current fiscal year. They cannot be applied to the next year or saved for future investments or transferred to another account. Generally, expenditure is incurred upon delivery of the merchandise or service. Encumbrances for undelivered goods or services do not qualify as expenditures.
- Aid received cannot exceed the total cost of the EPE program.

### **Expenditures/Revenues Compared**

After the EPE Claim Form SA160.2 is submitted annually each year, a comparison is made by the NYS Education Department's State Aid office of revenues and expenditures in the previous fiscal year (see Appendix 3). If revenues exceed expenditures, the agency must reimburse NYSED for the difference. In most cases, this amount is deducted from the second period claim in the subsequent year; as the second payment is usually the larger and cash flow will be affected less.

### **Prorating Expenditures**

One of the most important bookkeeping procedures is prorating EPE expenditures. Since EPE funds can only be spent on the EPE program, it is essential that this can be demonstrated. The most common instances where prorating is needed are:

- Equipment or materials are shared by an adult education program and a K-12 program, typically computers or non-consumables,
- A program is comprised of both EPE eligible and non-EPE eligible students

The preferable way to prorate expenditures is to calculate the percentage of contact hours for non-EPE eligible students in the program and apply funding sources other than EPE to that percentage of each cost category. For example, if in a given program 50 percent of the students are under the age of 21, 50 percent of the teacher's salary, supplies and materials, utility costs, rent, computer costs etc., should be paid from a non-EPE source.

It is also acceptable to prorate based on the entire cost of the program. The entire cost of the program must be calculated and, in the example above, 50 percent of the total cost would be paid by EPE funds. For example, if the entire cost of the program was \$100,000, and 50 percent of the students were EPE- eligible, the agency may wish to pay \$50,000 in teacher salaries from EPE and the balance of costs from other sources. In this method it is essential that the calculation includes all program costs. Receipts or salary records must be available to demonstrate the cost. A reasonable formula must be used to calculate the portion of the entire cost that can be attributed to EPE students. This is done by comparing total contact hours or hours of use (in the case of equipment) and the portion of contact hours or use by EPE eligible students. Where expenditures are prorated between EPE eligible and non- eligible students, it will be necessary to record contact hours for both groups of students.

Prorating may also be necessary when other funding sources are blended to support a class. Sources such as FTE, WIOA Titles I and II, and tuition are often used to support students in EPE programs. The same prorating formula is used to ensure that EPE funds do not supplant the other funding sources. Prorating is also necessary for administrative costs. In programs where staff perform administrative tasks for both EPE and non-EPE programming, the cost of support staff time, supplies and materials, etc. charged to EPE must be documented and prorated to the percentage of time spent specifically on EPE program related tasks or activities.

### **Serving Non-eligible Students**

Frequently, agencies encounter students that are not eligible to generate EPE aid but are in need of educational services. Funding for this population is limited, so these students are often enrolled in an existing adult education class supported by EPE aid. The number of students that are in this category should be kept to a minimum and may not exceed ten percent of the enrollment in the EPE funded class.

### **Expenditures by Program Area**

If a school district or BOCES offers several program areas (i.e., traditional, Distance Education, Work Experience and Career and Technical Education), the ratio of revenue generated versus costs incurred will vary. Some areas may generate revenues in excess of the cost of the program while others may generate less than the cost. In general, EPE funds generated by one program area should be used to support that area. When these costs have been met, the balance may be reallocated to other EPE program areas.

### **Specific Allowable Expenditures**

Instructional costs, without adjustments, are at least 80% of budget total, and other costs, including indirect costs, without adjustment, are no more than 20% of budget total.

### **Equipment Expenditures**

All equipment, including computer equipment and software, purchased with EPE funds must be used to support EPE programs provided by the district or BOCES. Computer equipment purchased

with EPE funds that is not made available to EPE eligible students or held in storage is not an allowable expenditure. Any license fees for computers not in use, software license fees or software package costs that are in excess of current adult education program needs are also not allowable expenditures. In all cases, school districts and BOCES must be able to document that expenditures are related to the EPE program (i.e., available to and being used by EPE eligible students as part of the adult education program leading to an HSE diploma). A detailed and updated inventory of all equipment and software purchased with EPE funds should be maintained on file at the local level.

### **Indirect Cost**

According to the NYSED's [Fiscal Guidelines for Federal and State Aided Grants](#), indirect costs can be broadly defined as central administrative costs and certain other costs associated with the organization that are incurred in connection with a project but that cannot be disaggregated (e.g., payroll preparation, central purchasing). An indirect cost rate may be established that, when applied to the direct cost of EPE program, generates an amount to be used in support of such central administration costs.

Indirect costs for EPE must be claimed through the use of the Department's restricted indirect cost rate. The direct cost base to establish the restricted indirect cost is calculated the same for EPE as for an FS10 budget. Indirect cost rates for school districts are computed annually by the NYSED Grants Finance Department on the basis of data contained in each district's Annual Financial Report, and range from one to seven percent. Only these rates, which are computed by the Department, may be used to determine EPE eligible indirect cost expenditures by school districts and BOCES. These rates indicate the maximum allowable indirect costs. Schools may opt to claim less indirect costs, allowing more money to be used for other budget categories.

### **Interest on Loans**

The interest on loans that are taken out to cover EPE cash flow needs is not an allowable EPE expenditure. This is consistent with the requirements for all adult education funding administered by NYSED.

### **Professional Development**

All professional development activities should be consistent with the NYSED's plan to improve instruction. Professional development received from the RAEN is at no cost to programs receiving EPE state aid. EPE funds may be used to support the cost of additional professional development for teachers and administrators of EPE programs if the professional development is deemed appropriate and approved by AEPP. Detailed records should be maintained regarding all expenditures including training content, travel, lodging, meals, fees, etc. While it is required that teachers receive a minimum of fourteen hours of professional development from the RAEN each year, agencies are encouraged to provide more if possible. This includes both part and full time staff (professional, clerical, and data).

### **HSE Test Administration**

EPE funds may not be used to support the administration of the HSE test, however, assessments given for test readiness is an allowable, EPE reimbursable, activity; administration of the HSE readiness assessment in the course of regular classroom instruction is an allowable expense.

### **Food and Incidentals**

EPE providers must seek other funds for food, beverages, and incentives such as gift cards. EPE funds may be used to pay for the cost of certificates of achievement and/or promotional brochures such as HSE graduation ceremonies.

### **Marketing**

The costs of brochures, fliers, mailings, and radio and television ads are allowable expenses for the promotion of the EPE program, to recruit EPE eligible students, and to be used at community outreach activities within reason.

### **Community Education**

EPE funds cannot be used to support the cost of community education programs. Community education programs are those that are not designed to lead to employment or a high school diploma or equivalent or are not approved by the Commissioner as part of the comprehensive plan of service. This includes any of the related costs of community education such as administration, utilities, rent, etc. Community education programs are defined as avocational subjects which involve instruction in recreational or leisure-time activities and which are not offered to: prepare students for a diploma or a high-school equivalency diploma; assist students to read, write or understand the English language, or provide entry-level occupational training.

### **Transportation**

EPE providers must seek other funds for transportation such as the local Department of Social Services. EPE funds may be used to pay reasonable costs for student transportation for students going to and from EPE funded classes only. This may include tokens, the cost of a van or bus, or cab fare.

### **Support Services**

While case management that is not related to intake, assessment and the preparation of an individual employment and education plan does not generate EPE aid, it is an allowable EPE expense. This includes case management to assist the student in making the transition to work. Case manager time spent with EPE students must be clearly documented in ASISTS.

### **General Program Costs**

A general program cost directly attributable to an EPE program that is not precluded in this document can be an acceptable EPE program expenditure. This includes the cost of building

maintenance, cleaning supplies, telephone use, utilities, building lease, and security costs for the portion of the building used for EPE programming. Depreciation should not be considered a program cost. All of these expenses must be documented as for the EPE program only or prorated with adequate documentation.

### **Audit Exceptions**

Payments made to the Education Department based on audit disallowances of EPE contact hours or EPE expenditures are not acceptable EPE expenditures.

### **Teacher Requirements**

EPE aid can only be generated by a certified teacher (Adult Education certified or K- 12 certified). Teachers who hold a valid provisional, permanent, initial or professional New York State teacher certificate in any subject/grade/title are able to generate EPE aid in any EPE program area. All other EPE program teachers must have appropriate adult education [certification](#). Agencies that are able to document that teachers have applied for an adult education certificate and are pending approval will be able to claim EPE aid for instruction provided by that teacher.

### **Adult Education Instructor Certification Titles**

The following titles have been developed which distinguish adult education instruction from other pre-kindergarten, kindergarten and grades one through twelve instructional certificate titles and are designed primarily for purposes of generating EPE funds:

- **Adult Education Instructor/Literacy and HSE Preparation Instructor-** This title applies to teachers in the following areas: ABE, HSE test preparation, family literacy, NEDP, GRASP, SMART
- **Adult Education Instructor/English as a Second Language Instructor-** This title applies to teachers in English as a Second Language programs, both traditional and Distance Education
- **Adult Education Instructor/Assessment -** This title applies to staff that provide intake assessment, evaluation, and the preparation of education and employment plans.
- **Adult Education Career and Technical Education (CTE) Instructor -** This title refers to teachers of short-term vocational training in non-certified occupational areas. It also can be used in certified occupational areas in cases where the teacher does not have appropriate secondary certification.
- **Adult Education Instructor/Work Experience Instructor-** This title applies to teachers conducting EPE-funded Work Experience programs. Individuals teaching in more than one of these areas need only be certified in their primary area of adult education instruction or have provisional, permanent, initial, or professional New York State teacher certification.

Teachers of EPE instruction in continuing education programs holding valid adult education certificates with equivalent or similar titles to those noted above need not apply for a newly titled certificate. Upon expiration of such certificates and at the time of their renewal, applicants should request adult education certification using the titles noted above.

## **Teachers of Distance Education Programs**

In addition to certification, teachers of EPE Distance Education programs must have specific and appropriate training for the Distance Education program to generate EPE. This training is available through each of the seven RAEN offices.

Agencies wishing to offer EPE Distance Education programs for the first time may be approved provisionally as part of their comprehensive plan. These new programs may not generate EPE aid until a teacher has received the NYSED approved EPE Distance Education training. If a teacher leaves an agency that has been offering EPE Distance Education, the agency may still offer the EPE Distance Education program providing the new teacher was trained by the previous teacher and that the new teacher is enrolled in the next training session available through the RAEN. This is done to allow continuity of a program since EPE Distance Education training is not always immediately available. In no case will training by a previous teacher substitute for the NYSED approved training beyond this single exception. Permission to offer the program pending training will be considered on a case by case basis.

## **Records and Documentation**

### **General Record Keeping**

Commissioner's Regulations require that every student served in an EPE program have an individual student folder that is easily accessible to the student and to the teacher. The folder should contain information concerning registration, attendance, testing, and individual program needs. At a minimum, registration information must be dated and include the student's name, class attendance including dates and times, the student's date of birth, and the student's diploma status. The EPE amendment of 1995 requires that each folder must also contain an Education and Employment Plan (EEP). The EEP should specify the school year covered.

Attendance records can be kept in a central location but must be clearly identified in the students' folder. Original attendance records, each signed by the respective teacher, should be kept for a period of not less than seven years.

### **Attendance in Classroom Programs**

The EPE program provides reimbursement to agencies based on their own report of reimbursable services rendered to adult students. For this reason, there must be a clear audit trail from the contact hours reported on the SA160.1 and SA160.2 forms to student attendance in the classroom. This applies to all traditional programs as well as CTE courses, and the classroom component of the Work Experience program. In each of these programs, contact hours must be clearly documented. Any overstated or undocumented contact hours will be questioned upon audit and revenues may be reduced accordingly. The district or BOCES must maintain classroom attendance rosters of all students who attend EPE programs. Documentation must clearly support reported contact hours and compliance with requirements regarding maximum class size (20) and the maximum number of class hours per week (20). All variances (see waivers section below) must be approved annually



and in writing by NYSED. These attendance rosters must be signed by the teacher assigned to the class.

### Attendance Policy

Because EPE State Aid reimburses the school or BOCES for contact hours of service already provided, it is essential that agencies document student attendance accurately. Attendance must be documented so that every hour of attendance claimed for every student can be verified. Attendance rosters must be certified by the classroom teachers. Documentation must be kept on file for audit purposes. All agencies receiving EPE state aid must have a written attendance policy. In the best interest of each district or BOCES, their internal attendance policy must align with the attendance policy as outlined in this manual and the annual EPE application. This must include the policy on rounding, absenteeism, and enrollment.

### Standardized Half-Hour Rounding Policy

All programs must follow this protocol. All rounding for EPE contact hours must be done on a half-hour schedule. This rounding may be up or down depending on whether the student arrives late or leaves early or both.

The following chart demonstrates examples of how to round up or down as contact hours are entered into attendance documents and then entered into ASISTS. All programs must round their student contact hours based on this policy and enter the hours manually in ASISTS. In addition, programs are required to maintain documentation of this rounding.

The following chart is a sample of how the half hour rounding should be maintained:

Time Class Scheduled	Time Student arrives to class	Round Up or Down	# of contact hours to record for attendance roster providing the student remains in class until 12:00 pm
9:00 am – 12:00 pm	9:01 am – 9:14 am	9:00 am	3 hours
	9:15 am – 9:30 am	9:30 am	2.5 hours
	9:31 am – 9:44 am	9:30 am	2.5 hours
	9:45 am – 10:00 am	10:00 am	2 hours
Time Class Scheduled	Time Student leaves class	Round Up or Down	# of contact hours to record for attendance roster providing the student entered the class on time at 9:00 am
9:00 am – 12:00 pm	11:00 am 11:14 am	11:00 am	2 hours
	11:15 am – 11:30 am	11:30 am	2.5 hours
	11:31 am – 11:44 am	11:30 am	2.5 hours
	11:45 am – 12:00 pm	12:00 pm	3 hours

Note: Case Management must be a minimum of 15 minutes in order for the program to claim the full 30 minutes per the rounding policy above. Please note that not all case management is EPE reimbursable.

### Electronic Attendance

Programs have the option of recording attendance data electronically in ASISTS. In addition,

should the program wish to record and maintain student attendance records electronically, the following protocols must be followed:

- Program provides an Excel electronic attendance spreadsheet to each teacher per class
- Teacher records daily attendance on the Excel spreadsheet, electronically
- Teacher certifies the spreadsheet at the conclusion of each week with their certified electronic signature.

When data has been verified by central administration and entered into ASISTS, the electronic Excel spreadsheet is locked with password protection and stored on a server maintained by the adult education program exclusively. Electronic spreadsheets must be saved and stored for a minimum of seven (7) years.

### **Contact Hour/Attendance/Assessments/Follow up Outcomes Data in ASISTS:**

Contact hours must be entered into assists no later than the end of the month following when the attendance occurred. Example: September contact hours must be entered no later than October 31st.

### **Burden of Proof**

The burden of proof for producing the necessary documentation to ensure accuracy and compliance with the Commissioner's Regulations rests on the provider. To avoid audit exceptions, agencies must have annual written approval from the AEPP team of any interpretations, annual waivers or informal understandings about how the district or BOCES can generate or use EPE.

### **Attendance Rosters**

Attendance rosters are kept in the classroom where the teacher notes the number of hours of attendance on a daily basis. These attendance rosters need to be retained to support claimed EPE contact hours. The classroom teacher verifies that the attendance is accurate each time the roster is completed. The original documentation used to create the ASISTS attendance records must be certified (signed) by the teacher and retained for records retention purposes for seven years beyond the date of service. Attendance rosters must be made available during site/monitoring visits and for audit purposes.

The regulations allow for an employee other than a teacher, who is in a position appropriate for the keeping of records, to verify attendance. The person verifying attendance must be in a position to observe student attendance on a daily basis. It is required that attendance be recorded in half hour increments. Attendance records should be kept in ink and "white out" is not permitted. Original attendance records should be kept for six years plus the current year for a total of seven years.

### **Unique Student Identifier**

Educational agencies receiving funding to operate adult education programs are encouraged to collect the Social Security numbers for students. Any forms or files that contain student social security numbers must be secured in a locked cabinet. ASISTS automatically assigns a unique

student identifier which eliminates problems occurring when more than one student has the same name.

## **Records Retention**

Programs should refer to [Records Retention and Disposition Schedule ED-1](#) from the New York State Archives for complete information regarding records retention.

Any record that would be necessary to document the generation of contact hours for audit purposes should be kept for six years plus the current fiscal year for a total of seven years. This includes but is not limited to:

- Attendance rosters
- Completed Individual Student Record Forms
- Evidence of student eligibility
- Evidence of teacher certification
- Evidence of course approval (CTE)
- Required assessment score sheets (TABE, BEST 2.0, BEST Literacy)

The following can be discarded when the student exits from the program:

- The Education and Employment Plan (EEP)
- Samples of student work

For Distance Education programs, the auditable documents necessary to reserve for 7 years:

- Teacher Packet Assignment Record (1 per packet)
- Student Work Time Record (1 per packet)
- Teacher Assignment Log (1 per month per student)

## **Record Keeping in Distance Education Programs**

In addition to student time on task, distance education programs generate EPE aid based on teacher instructional hours. Four key items that must be documented:

- Active enrollment must be documented. A record must be kept of the receipt, correction, and preparation and sending of required work. The subject matter and specific lessons completed as well as student performance on the assigned work should also be noted. Dates must be maintained indicating when the packet was returned.
- In all Distance Education programs, ongoing records of work assigned to and completed by the student must be kept. A new teacher should be able to step in, if necessary, and be able to continue the work begun by the previous teacher.
- Actual hours that a teacher works as part of the instructional process must be documented. The actual hours that the teacher worked on the distance education program must be able to be determined from the records. If a teacher's time involves duties other than teaching the distance education program, the records should show the hours spent on the various duties. Hours of intake and assessment need to be kept in the same detail as traditional classroom programs and can be claimed at the traditional rate.
- Hours of tutoring (up to 3 hours per week) need to be kept in the same detail as

traditional classroom programs and are reimbursed at the traditional rate. It should be noted that tutoring may be one on one or a classroom setting.

### Record Keeping in Work Experience Programs

In the traditional component of Work Experience programs, attendance records must be maintained as with any classroom program. In addition, each student folder must contain records documenting Work Experience attendance, a record of site visits by the supervising teacher, and information regarding student participation and progress.

### Professional Development

Each agency receiving EPE aid must provide all staff (professional, clerical, and data), both full and part time, with a minimum of 14 hours of professional development related to the development and organization of programs for adults. The 14 hours must be professional development hosted by the regional RAEN center. A professional development plan must be submitted with the initial application for EPE funding. The plan must include a description of how professional development will be coordinated with the local RAENs. Any program not meeting the performance outcomes established as part of the National Reporting System may be required to subscribe to additional professional development in identified areas to improve program performance.

### Waivers

#### EPE Program Annual Waivers

Under Part 168 of the Commissioner's Regulations, no class register should have more than 20 students unless a waiver is approved. In general, an average daily attendance of 20 or less must be maintained.

Classes should operate at least six but not more than 20 hours per week, unless otherwise approved by the AEPP office. To receive an annual waiver of these requirements, the following information must be included with the program's annual EPE application:

Waivers must be requested annually:

- The maximum number of students on the class register or the maximum number of hours the class will operate each week. Waivers will not be granted for a class roster to exceed 35 students or for more than 40 hours each week. In cases where a waiver is requested to provide instruction for fewer than six hours per week, the minimum number of hours must be identified however, at no time will less than four hours per week per class be permitted.
- The annual waiver request should indicate how a high level of quality would be maintained with an increase of students. Innovative approaches to ensuring student success are encouraged (e.g., individualized instruction, team teaching and instructional aides).

### Geographic Range Policy

Traditional and distance education programs operated by BOCES in Component and non-

#### Component School Districts:

- BOCES may operate a program physically located in any school district within component school district boundaries without written permission from the district. If a school district within a BOCES demonstrates to NYSED that the BOCES program is offering duplicative services of the district, then the BOCES will no longer be able to provide services within the boundaries of that school district. A BOCES may operate a program physically located in another BOCES district, or any neighboring school district outside their component school boundary only with an NYSED approved EPE Geographic MOU between the BOCES District Superintendent and the Superintendent of the school district in which the program will be located.

#### Traditional Programs Operated by a Component School District when the BOCES also operates a Traditional Program:

- The BOCES and component school district may operate a traditional program unless it can be demonstrated to NYSED that the program is duplicative of services and there is no demand for programming.

#### Traditional Programs operated by School Districts in another District:

- A school district wishes to operate a program physically located within the boundaries of another school district, the school district operating the program must complete an NYSED approved EPE Geographic MOU between the superintendents of the two districts.

In each of the cases listed above, an MOU, signed by both parties, will be approved on an annual basis and must be submitted annually. There are two opportunities for MOU submission to the AEPP office: in the annual EPE application and in November of each fiscal year. The November MOU, should it be approved by the AEPP office will be effective from January 1<sup>st</sup> of that fiscal year through June 30<sup>th</sup> of the same fiscal year.

#### Non New York State Residents

Students who do not reside in New York State cannot generate EPE aid.

#### Statement of General Assurances

A Statement of General Assurances signed by the District Superintendent of each school district or BOCES receiving EPE Aid must be submitted with each year's application. This document requires the District Superintendent to agree to comply with all of the statutory requirements of the EPE Program.

#### EPE and Other Funding Sources

While some EPE programs operate exclusively using EPE aid funding, most use EPE aid in combination with a range of different resources. The most common sources are:

- Workforce Innovation Opportunities Act Title II (WIOA)
- New York State Welfare Education Program (WEP) targeted to public assistance

recipients

Care must be taken in allocating costs when funding sources are combined. EPE funds must be spent on programs for EPE eligible students.

## **Fees and Tuition**

### Fees

It is permissible to charge a nominal fee, commonly referred to as a registration fee or materials fee, to support the high cost of intake or to replenish supplies. Agencies should be mindful that the eligible population is largely low-income, receiving public assistance, unemployed, or underemployed. NYSED does not encourage charging tuition for any program supported by EPE, *with the exception of CTE programs*, which tend to be more expensive to operate than the amount reimbursed by EPE; in this case, the program may charge the student tuition for CTE programming. The use of fees to help support the cost of programs should never prevent a potential student from receiving needed services.

Combining funding sources to cover the actual expenses of operating a program is acceptable. It is acceptable to charge tuition to generate additional revenue. If the combined total of the tuition plus the EPE aid plus all other sources of revenue for the program, however, exceeds the actual costs to operate the program, then the excess EPE must be returned to NYSED.

### Tuition

Although tuition may be charged to students in EPE programs. Programs using EPE funds are not required to provide all services free of charge to participants. New York State Education law specifically mentions tuition as one source of bridging the gap between aid and cost. Although tuition may be charged, the NYSED AEPP Team recommends that whenever possible, literacy and basic education programs be provided without cost to participants because a high percentage of the population served by these programs are low income individuals.

BOCES and school districts must be mindful that the eligible population is largely low-income, receiving public assistance, unemployed, or underemployed. NYSED does not encourage charging tuition for any program supported by EPE, *with the exception of CTE programs*, which tend to be more expensive to operate than the amount reimbursed by EPE. The use of fees to help support the cost of programs should never prevent a potential student from receiving needed services.

### Coordinated Programs with Community Colleges

Several community colleges and BOCES and school districts have coordinated programs combining EPE State Aid and Non-credit Remedial FTE funding. It may be possible for EPE funds to be generated if the teacher is employed by the school district and the arrangement has been approved by NYSED. These arrangements are reviewed and approved on a case by case basis by AEPP.

Non-Credit Full Time Equivalency (FTE) Arrangements must be entered in the ASISTS data base.

All classes and students funded with FTE arrangements must be coded as such in ASISTS. Both classes and students must have the FTE funding code attached to each file.

The program applying for these arrangements must include a copy of any contractual agreement between the EPE funded program and the community college. Included in the application process is the following information:

- Type of program (ABE, ASE, ESL)
- Roles and responsibilities of the two agencies
- Students being served and generating FTEs and EPE State aid
- Revenues expected to be generated by the respective funding sources
- Expected expenditures from each source, administrative costs and any other details of the contractual arrangement
- The proposed budget for the entire FTE agreement

### Equipment Disposal

Equipment (items with a per unit value greater than \$5,000) purchased with EPE funds should be disposed of in the following way:

- If the equipment is disposed of, a receipt must be kept of the disposal
- If the equipment is given to a charitable organization, a receipt must be obtained
- If the equipment is sold, a receipt of the sale must be kept as well as evidence that the revenue from the sale is being used on the EPE program. Used equipment must be sold at fair market value. Proceeds from sale of assets should be included as EPE revenues
- If the equipment is traded in, the receipt of purchase must be kept indicating the trade-in value
- If equipment purchased with EPE funds is transferred to a non-EPE non-adult education program, or if an EPE program closes, equipment purchased with EPE funds can be used by the school district or BOCES if the school reimburses NYSED for the fair market value of the equipment. If the equipment is disposed of as indicated above, any profit resulting from the sale of used equipment must be returned to the State Education Department.

## **Appendix 1**

### **Comprehensive Plan of Service Employment Preparation Education Program**

The Superintendent or Chief Administrative Officer of the applying agency certifies that:

- The officer signing the application is officially empowered to act on behalf of the agency.

For the Employment Preparation Education (EPE) programs, other than credit-bearing high school courses, the following program approval requirements will be met:

- A curriculum approved by NYSED will be used.
- Instruction will be individually prescribed and paced in each class.
- Education and Employment Preparation plans will be developed for individual adult students.
- Individual student folders will be in a central location such that students and teachers can access them. The folders must include information concerning:
  - Attendance
  - Individual Student Record Form (ISRF) issued annually by NYSED
  - Assessment score sheets (for all pre and post-tests)
    - BEST 2.0 score sheet or electronic report (individual by student)
    - BEST Literacy scoring booklet
    - TABE test score sheet
    - HSE Exam Readiness Assessment score sheet (if applicable)
  - Americans with Disabilities Act declaration
    - Original signature from student
  - Education and Employment Plan (EEP)
    - Customized to student's entry literacy levels and goal selection
    - Updated at least quarterly
- Class registers may not exceed 20 students unless a written waiver is granted by NYSED.
- Classes will operate at least six and not more than 20 hours per week, unless a written waiver is granted by NYSED. Written waivers will not be granted for more than 40 hours per week.
- A total of at least 150 hours of instruction will be made available to individual students.
- Each professional staff member serving in the Employment Preparation Education programs will attend a minimum of fourteen hours of professional development annually



offered by the Regional Adult Education Network.

- English-speaking students will be given NYSED assessments in reading and mathematics to determine their approximate skill level.
- English-speaking students in need of basic skills will be provided instruction in reading, mathematics, verbal and written communication.
- English-speaking students will be given NYSED approved assessments which do have forms for post-testing as per NYSED assessment policy.
- Students with limited English proficiency will be given NYSED approved assessments before being placed in appropriate level instructional programs.
- Students with limited English proficiency will be provided instruction in listening, reading, verbal and written communication.
- Each ABE and ASE student must be pre and post tested in person on the NYSED approved assessment in both Math and Reading.
- Students preparing for the High School Equivalency test will be referred to the test when they demonstrate readiness, as indicated by the readiness assessment or other NYSED approved instrument.
- Programs will submit required data to NYSED via the electronic data system ASISTS on a quarterly basis.
- Scores from the readiness assessment must be recorded in ASISTS and on the T-TAF when referring students to the High School Equivalency test.

Agencies will apply minimum requirements for program administration and data staff per the requirements below:

<b>EPE Dollars</b>	<b>Staff FTE-Administrator</b>	<b>Staff FTE-Data Staff</b>
\$100,000 or less	at least .25 FTE	at least .25 FTE
\$100,001 - \$160,000	at least .3 FTE	at least .3 FTE
\$160,001 - \$220,000	at least .4 FTE	at least .4 FTE
\$220,001 - \$300,000	at least .5 FTE	at least .5 FTE
\$300,001 – \$380,000	at least .6 FTE	at least .6 FTE
\$380,001 - \$460,000	at least .7 FTE	at least .7 FTE
\$460,001 - \$540,000	at least .8 FTE	at least .8 FTE
\$540,001 - \$620,000	at least .9 FTE	at least .9 FTE
\$620,001 and over	at least 1 FTE	at least 1 FTE

Administrator and teacher qualifications will be governed by Part 157.1 of the Regulations of the Commissioner of Education.

The facilities used to provide instruction for EPE programs are covered by fire and liability insurance and meet all applicable State or local fire and safety standards.

The agency will comply with Title IX, Education Amendments of 1972; Title VI of the Civil Rights Act of 1964; the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1991.

I have completed this application accurately to the best of my knowledge and have read and understood the entire Statement of General Assurances. I understand that Employment Preparation Education aid generated by these programs must be expended only on EPE programs.

Signature of Superintendent or Chief Administrative Officer (original)	Date
--	------

Print or type name

Agency Address

SAMPLE

Telephone No.

## **Appendix 2**

### **First Time EPE Applicants**

A school district or BOCES applying for EPE aid for the first time must submit a complete application and the following in narrative form:

- A summary of the agency's overall adult education program within the district (not including community education),
- An evaluation plan for determining the effectiveness of all program components,
- A professional development plan including coordination with the RAENs for the required fourteen (14) hours of professional development,
- A description of student intake, assessment, and evaluation procedures,
- A description of the plan to coordinate programming regionally to assure maximum effectiveness and to avoid duplication of services,
- Support for educational initiatives identified annually by the NYSED AEPP team,
- Signed Statement of General Assurances (Appendix 1) demonstrating compliance with required program and fiscal reporting

#### **Comprehensive Plan of Service**

Every school district and BOCES seeking to operate an EPE program must submit to the Education Department's Adult Education Programs and Policy (AEPP) Team a comprehensive plan of service that includes information regarding major programs that will be offered and the effectiveness of those programs.

Specifically, the comprehensive plan includes:

- **Cover Sheet** with an original signature of the Superintendent or the Chief Administrative Officer;
- **Completion of the annual EPE application including:**
  - **Program Component Worksheets** with projected enrollment and contact hours for each program component for which the agency is seeking approval;
  - **EPE Program Component Summary Sheet** which provides the total number of projected students and contact hours for each component (reentered from the individual Program Component Worksheets), the projected EPE aid to be generated, and projected expenditures for the year;
  - **Statement of Assurances** signed by the Superintendent or the Chief Administrative Officer certifying that the agency will meet all EPE program requirements, and
- **Other information** that may be required based on new or emerging NYSED priorities or requirements. The EPE application is updated annually to reflect new priorities or requirements.

#### **EPE Comprehensive Plan of Service Approval Process**

In approving the comprehensive plan of service, NYSED staff evaluate the following:

- The effectiveness of the proposed program components based on past program data using the National Reporting System performance measures as compared to NYS benchmarks.

- The likelihood that CTE programs achieve employment outcomes for adults (this review does not constitute approval of individual CTE courses)
- The support for educational initiatives and priorities identified by the Department;
  - Geographic accessibility of programs and lack of duplication in any region, and
  - The assurance that program expenditures will meet or exceed the projected revenues from all sources

Based on this review, approval will be granted to agencies to claim a total number of contact hours for the program year in the approved program component areas. This approval sets a cap on the total amount of EPE aid that can be claimed so that the statewide limit will not be exceeded. Agencies may be requested to provide clarification or additional information before receiving a formal approval letter for all program components contained within their application.

## Appendix 3

### **Employment Preparation Education (EPE) State Aid Claim Forms SA160.1 and SA160.2 Instructions**

These claim forms are automatically populated by the ASISTS database. The ASISTS generated SA 160's must include an original signature of the District Superintendent or the Superintendent. However, a copy must be faxed with or without a signature to meet the deadline as long as a copy with an original signature follows within the time frame requested.

#### Part 1. Cover Page populated by ASISTS

#### Part 2. Claim Form, Interim Projections and Enrollment Distribution for Students without a High School Diploma or Equivalent

- The SA- 160.1 is used to claim EPE Aid for the period July 1 through December 31, and is due in February. The due date is scheduled annually and announced by NYSED.
- The SA- 160.2, for the period January 1 through June 30, is due in September. The due date is scheduled annually and announced by NYSED. Claims received after the due date may not be processed or paid.

The interim projections are the methodology by which NYSED reallocates EPE contact hours. It is imperative that the interim projections are included and represent the entire year.

Agencies projecting a higher generation of EPE contact hours on the SA 160.1 are not automatically approved to receive an increase in EPE State Aid. Reallocations of EPE State Aid, within the funds available statewide, will be considered after all Interim Projections have been reviewed. Agencies will be notified in writing.

#### Part 3. Claim Form, Interim Projections and Enrollment Distribution for Students with a High School Diploma or Equivalent

The same information is reported in Part 3 as in Part 2, but for those students that have been awarded a high school diploma or equivalency, but “fail to demonstrate basic education competencies”. If total contact hours claimed for these students exceeds 3 percent of the total claimed the additional funds may not be paid.

This is a sample SA160; these reports are generated directly from ASISTS:

**Employment Preparation Education State Aid Claim Form SA 160.1**

**Part 2. Claim Form and Interim Projections for Students without a High School Diploma or Equivalent**

	Components	Claim Form July -December		Full Year Projections** July -June	
		Contact Hours	Enrollment	Contact Hours	Enrollment
Line 1	Traditional Adult Education				
Line 2	Distance Learning Education				
Line 3	Adult Occupation Education				
Line 4	Work Experience				
Line 5	TOTAL				

Line 6	Additional Adult Career & Technical Education not tracked in ASISTS				
	TOTAL				

**Agency Name:**

**SED ID:**

**Program Manager:**

**Telephone:**

**Address:**

**Superintendent Name (Please Print):** \_\_\_\_\_

**Superintendent Signature:** \_\_\_\_\_

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

**Employment Preparation Education State Aid Claim Form SA 160.1**

**Part 2. Claim Form and Interim Projections for Students with a High School Diploma or Equivalent**

	Components	Claim Form July - December		Full Year Projections** July - June	
		Contact Hours	Enrollment	Contact Hours	Enrollment
Line 1	<b>Traditional Adult Education</b>				
Line 2	<b>Distance Learning Education</b>				
Line 3	<b>Adult Occupation Education</b>				
Line 4	<b>Work Experience</b>				
Line 5	<b>TOTAL</b>				
Line 6	Additional Adult Career & Technical Education not tracked in ASISTS				
	<b>TOTAL</b>				

**Agency Name:**  
**Program Manager:**  
**Address:**

**SED ID:**  
**Telephone:**

**Superintendent Name (Please Print):** \_\_\_\_\_

**Superintendent Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_