3.5 Description of Federal and State Reporting Requirements for Adult Education Programs

Effective Date:

Revises Previous Effective Date: N/A; titles updated July 1, 2008; Adult Learner Attendance Sheet updated Sept 15, 2012; Verification of Eligibility for Public Benefit effective December 19, 2012. Individualized student learning plan; January 1, 2016.

I. Policy:
   Reporting requirements and obligations must be met to demonstrate program effectiveness.

II. Applicability:
   This applies to all Adult Education offices and employees associated with the Technical College System of Georgia (TCSG).

III. Related Authority:
   Policies and Procedures Administrative Manual for Adult Education and Family Literacy Programs.
   Official Code of Georgia (O.C.G.A.) § 50-36-1

IV. Definitions:
   Adult Learner Attendance Record Sheet: the sign-in sheet utilized in Georgia’s adult education classrooms to document adult learner attendance.
   Assessment: the activity performed by a teacher/diagnostician to determine the instructional level of the adult learner, identify learner goals and evaluate progress.
Contact Hours: the number of instructional hours the learner receives. The time the learner spends in program-sponsored activities designed to promote student learning in the curriculum should be counted. Activities to count include:

- time in class receiving instruction;
- time in a learning lab;
- time spent with a program-sponsored tutor;
- assessment and follow-up; and
- time on assessment activities, including initial pre-tests and post-tests excluding GED® Test administration. (NRS)

Data Quality Components are reflected in the following:

- **Integrity** – Data with integrity is information that is not compromised through corruption or falsification.
- **Objectivity** – Quality data are information that is accurate and unbiased and presented in a clear, complete, well-documented manner. Objectivity is achieved by using appropriate data sources and sound analytical techniques, by using proven methods, and by carefully reviewing the content of all information and reports.
- **Reliability** – Following the same procedures consistently over time.
- **Reproducibility** – Quality data can be reproduced by others by using the documented methods, assumptions, and data sources to achieve comparable findings.
- **Transparency** – Transparent data involve having a clear description of methods, data sources, assumptions, outcomes, and related information that allow users to understand the data.
- **Utility** – Quality data are information that is useful and available to its intended audience.
- **Validity** – Ensuring the measures truly represent their underlying concepts.

Data Quality Links: each person in the process practices regular and frequent reviews of data entered into the data system. Data is reviewed for a) patterns that raise a question; b) numbers that are unrealistically too high or too low; c) missing data; d) out of range values such as 0% or 100% and compares data to last quarter/semester and last year.

Intake Assessment Form: the document used to collect demographics and other pertinent information from the adult learner at the time of entering the program.

Proxy Contact Hours: the verifiable hours earned outside of the adult education classroom. Students who complete designated instructional activities at a distance using approved distance education curricula, such as web-based programs, video-tapes, software, and print-based materials can earn proxy contact hours. Proxy contact hours are awarded via three approval methods; Teacher Verification, Mastery Model and the Clock Time Model. The number of proxy contact hours
awarded is determined by the curriculum, the model used to assign the hours, and the distance education policy. Please consult Section IV, Distance Education of the Assessment Policies and Procedures Manual for more information and a list of approved curricula.

**Student Files:** the official records of adult students that contain the completed Intake Assessment Form, individualized student learning plan, assessment instrument and results, instructional strategies and materials, attendance information and other pertinent information. Counseling notes update changes of information throughout a student’s enrollment in the Adult Education Program. Files must be maintained for all adult learners included on statistical reports.

**Student Record System:** a computerized or paper-based system for keeping track of student attendance, intake information, achievement and outcomes. (NRS)

IV. **Attachments:** (Use the back button on your browser to return to this section after viewing an attachment).

- Driver’s License Certificate of Attendance – Form
- Driver’s License Certificate of Attendance – Directions
- Office of Adult Education – Enrollment Verification Form
- Request for Application (RFA) Reporting Requirements and Obligations
- Verification of Eligibility for Public Benefit Affidavit - Form
- Verification of Eligibility for Public Benefit Affidavit - Directions

VI. **Procedure:**

**Reporting Requirements and Obligations:**
The Reporting Requirements and Obligations include reports, meetings, trainings, data collection, self assessment monitoring and data quality review. The activities are set forth below:

**Assessment**
Data quality leads to information that is accurate, useful, unbiased and presented in a clear manner. Only state approved standardized assessment instruments may be used. Standardized assessment tools have the following characteristics to ensure the highest data quality:

- Maintain a constant testing environment, scoring norms and testing conditions that are the same for all test takers.
- Possess Validity, which is the degree to which evidence and theory support the interpretations of test scores entailed by proposed use of tests.
- Have Reliability, which is the degree to which test scores are consistent for test takers and the degree to which scores are free from errors of measurement for a given group.
- Provide alternate forms of the same test for pre and post testing which are constructed to the same explicit content and statistical specifications and administered under identical conditions.
- Aligned to the NRS Educational Functioning Levels.
- Approved by the National Reporting System for Adult Education.

**Budget Management**

Oversight and management of the Grantee’s budget is the responsibility of the Adult Education program administrator. The program administrator is required to meet monthly with a member his/her organization’s budget office in order to reconcile any budget concerns. An annual budget review meeting by the Office of Adult Education with the Program Administrator is also required.

**Data Quality**

It is the responsibility of the local eligible program to review statistical report data on a continuous basis. The data shall be reviewed for:

- accuracy;
- comparisons between quarter/semester or years;
- numbers between reports and tables;
- patterns that raise a question or are unrealistically too high or low;
- missing data; and
- out-of-range data such as 0% or 100%.

**EL/Civics**

Local eligible program awarded federal EL/Civics grants will adhere to the rules and regulations as set forth in the RFA Provisions and Assurances and Reporting Requirements and Obligations.

**Fiscal Training**

When meetings are required for local fiscal personnel, the local eligible program will be responsible for the fiscal representative’s registration and travel expenses to attend the training.

**Funds Requisition**

The local eligible programs will be reimbursed for expenditures, as approved, by billing TCSG. Requests for reimbursement must be submitted monthly. Refer to Policy 2.3 for additional procedures.

**Information Requests**

The local eligible program will respond on a timely basis to any request for information submitted to the program from the TCSG.
Inventory
Local eligible programs shall conduct an inventory for all items $5,000 and over and submit the inventory record to the Office of Adult Education. Refer to Equipment in Policy 2.3

Local Advisory Committee
The local eligible program will establish an advisory committee for each program or each county of service. Refer to Policy 5.2 for general information and requirements.

National Reporting System (NRS) and Electronic Database
Data Submission
The federal National Reporting System (NRS) requires an identified set of data to be collected for each individual student by each local eligible program. The Georgia Adult Learners Information System (GALIS) is the database that collects the needed data. Local eligible programs are required to submit data electronically using the web based management information system.

Data should be available for review at all times. Timely data entry will allow staff to analyze data on a regular basis and use it for program planning and continuous program improvement. Failure to comply with the following conditions may result in the withholding of reimbursement payment.

- Local adult education providers shall enter student intake and assessment data by the 10th of the month for the previous month. Attendance contact hours must be entered weekly.
- Programs must maintain a secure data system to protect confidentiality and privacy of the students. Data (paper and electronic) must be housed in a secure location, and access to the electronic data must be restricted with individualized user passwords.
- Programs must assign dedicated staff to be responsible for maintaining program data and must participate in data-related training each year.
- Programs must follow state policy regarding the collection and use of Social Security Numbers (SSN) by:
  - Allowing a student to sign or reject a release of information form as required by The Family Educational Rights and Privacy Act (FERPA), and
  - GALIS will assign a student identification numbers in a consistent and documented fashion to all students which can be used in place of a Social Security Number.
- Programs must collect data elements consistent with federal reporting requirements and Intake Assessment Form data must be entered. Refer to Intake Assessment Form in Policy 3.3.
- Programs must enter assessment information into the database to document educational gains. Refer to Assessment in Policy 3.3.
• Core measures will be set and tracked by GALIS. Programs must enter identified secondary goals into GALIS and track the completion of these goals.
• Previously validated local data for each reporting year is entered into GALIS by the deadline published by the Data Center.
• To maintain the integrity of the database, it is necessary to limit the timeframe during which data may be altered.
• Local program administrators analyze their data, and if they identify data anomalies, corrections are made within the timeframe.
• No changes can be made to program year data after final state approval.

RFA Amendments
The local eligible program will submit requests for amending the RFA Contract following procedures. Refer to Amendments in Policy 2.2.

Self Assessment and Monitoring
The local eligible program will submit to periodic program review, monitoring and/or technical assistance on-site visits, and periodic fiscal audits. The program will conduct the annual self assessment and will evaluate program performance. Refer to Policy 3.8.

Source Documents
The local eligible program will maintain hard copies of source documents that are the beginning of the data collection process. Hard copies of these records are not submitted to OAE, but rather, the information on them is entered into the OAE database. Data collection and entry of these source documents must follow OAE procedures. Some examples of source documents include:
• Intake Assessment Form (refer to Policy 3.3)
• Adult Learner Attendance Record Sheet (see below)
• Assessment Records (refer to Policy 3.3 and Policy 3.6)

Student Assessment
The local eligible program will conduct an ongoing student assessment program according to the rules and regulations as discussed in the Adult Learner Assessment Policies and Procedures Manual. Refer to Assessment in Policy 3.4.

Student Files
Data collection begins with the Intake Assessment Form. Refer to Policy 3.3. The local eligible programs will maintain student files for all programs. A student file must be maintained on all students included in statistical reports.

Time and Effort
The applicant agrees to maintain Time and Effort Reports for all federally funded employees and part-time state funded employees. These reports must be signed by the employee and the supervisor.
Travel Requirements
All in-state and out-of-state travel performed in connection with approved project activities must be in compliance with the State of Georgia’s Code of Regulations and other official policies implemented by the Department, which cover per diem and travel expense, and other applicable expenses and procedures. Refer to Travel Regulations in Policy 2.3.

WIA Activities Narrative
The local eligible program shall provide a written narrative describing local collaboration with local One-Stops and other regional and local WIA activities. Refer to Narrative in Policy 5.3.

Procedure: Adult Learner Attendance Record Sheet

Student Attendance
All local programs must collect student attendance data in a way that is organized and verifiable. Programs may use a daily or weekly attendance sheet, as long as it contains the required components. The purpose of the attendance or sign-in sheet is to document the number of hours an adult learner spends in the classroom. Contact hours must be recorded daily and entered into GALIS at least weekly.

Sign-In/Sign-Out Procedures
Attendance records are commonly referred to as sign-in sheets by local programs. A sign-in sheet must be available for each class session. Attendance can be recorded on a daily or weekly sign-in sheet, but in and out times with student signatures must be recorded daily. Complete Social Security numbers must not be listed. If needed, the last 4 digits may be utilized. The student’s GALIS student number may be used. Every adult learner must sign-in and out of each class or lab attended. A sample sign-in sheet is included at the end of this section.

Student Procedures
The procedures for signing in and out of the adult education classroom should be explained to students during the intake process. Students should be advised that they are responsible for the accuracy of their attendance record. Adult learners should sign in upon arrival to class (first and last name) and record their arrival time. Initials are not acceptable. Adult learners should record their departure time before leaving the classroom.

Daily Monitoring
Program staff must ensure that students are signing in and out for all classes and labs. No one may sign in or out for another person. The attendance record should be maintained in a visible area, so it can be easily monitored. Each adult learner’s attendance should be verified daily. At the end of each class session, program staff should review the attendance sheet for errors and should follow local
protocols if there are any discrepancies. Attendance hours should be calculated each day and rounded to the nearest quarter hour. The person who is responsible for the accuracy of the attendance record should sign it before turning it in for data entry. Part of classroom maintenance is accurate record keeping. Failure to maintain attendance records in accordance with OAE policy can result in disciplinary action.

Proxy Contact Hours
Local programs will maintain records of proxy contact hours for both state and NRS reporting requirements. Attendance records for proxy contact hours may include:

- Printed usage reports that show the student’s name and total activity time during a specified range of dates (clock time model)
- Printed completion reports that show the student’s name, report date, assignments, and outcome by percentage (mastery model)
- Hard copy student work that shows that the student has completed the assigned work at the required mastery level (teacher verification model)

Once verified, the proxy contact hours can be reported. Hours should be recorded in GALIS with the designation of “proxy contact.”

Recording Contact Hours in GALIS
Local programs will record contact hours into GALIS at least weekly. All other student data from the prior month must be entered into GALIS by the 10th of the following month. Hours can be totaled for the week and assigned to the student on the last day of attendance for that week. Contact hours and proxy contact hours cannot be combined. They must be entered separately with the correct designation.

Student Records
Student records are where all student paperwork and documentation should be maintained. Records should be accurate and up-to-date. Sensitive student information must always be stored in a secure location.

Some local eligible programs have one file per student. Some utilize a two folder system that functions like this:

1. **Student Permanent File** - for confidential information that is secured
   a. Intake Assessment Form
   b. Assessment Records
   c. Underage Youth Application (if applicable)
   d. Withdrawal Form (if applicable)
   e. Other programmatic forms

2. **Student Work Folder** - a classroom file for student work and learning plans
   a. Individualized student learning plan
   b. Literacy to Work Plan (if applicable)
   c. Classroom assignments/work
Confidentiality

It is a goal of all adult education service providers to provide services in a confidential, trusting atmosphere. Each local eligible program has a responsibility to protect confidential information in accordance with the Family Educational Rights and Privacy Act (FERPA). An authorization will be provided which allows records and information to be disclosed, but also provisions will be available for a student to withdraw the authorization in writing.

In addition to the Confidentiality Notice on the Intake Assessment Form, students registering to take the GED® Test will be provided an additional opportunity to authorize the release of student GED® testing information or to deny the release of student GED® testing information.

The Adult Learner Attendance Record Sheet for Sign-in may be created by the local program or printed from GALIS.

Example:

**ADULT LEARNER ATTENDANCE SHEET FOR SIGN-IN (DAILY)**

| Program Name: ___________________________ | County: ___________________________
|------------------------------------------|-------------------------------------|

**Date:** __________  **Teacher:** __________________________  **Site:** __________________________

<table>
<thead>
<tr>
<th>Class Name: ___________________________</th>
<th>Class Days/Times: ___________________________</th>
</tr>
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<table>
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<tr>
<th><strong>Student Name</strong></th>
<th><strong>Student Signature</strong></th>
<th><strong>Time In</strong></th>
<th><strong>Time Out</strong></th>
<th><strong>Total Time</strong></th>
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**Total:** __________

**Personnel Signature:** __________________________

Procedure: Acquiring or Reinstating a Georgia Driver’s License

Students who are currently enrolled in an OAE program, who have met the attendance and enrollment requirements of the local organization, and who need to provide verification of classroom attendance to the Georgia Department of Driver Services (DDS) may request a completed Certificate of Adult Education Attendance form from the local program. The completed form can be used to make an initial application for a driver’s license or as proof of enrollment when seeking reinstatement of a license. The student
must submit the form to a Department of Driver Services (DDS) customer service center within thirty (30) days of the completion date.

**Procedure: Verification of Eligibility for Public Benefit**

According to Georgia law (O.C.G.A. § 50-36-1), state agencies administering a public benefit must require every applicant to provide a secure and verifiable document and execute a signed and sworn affidavit verifying his or her lawful presence in the United States before being eligible to receive the public benefit. A list of secure and verifiable documents from the Georgia Attorney General’s office has been provided. Local programs must make a copy of the secure and verifiable document and maintain it with the affidavit. All Office of Adult Education grantees that receive state funds are required to comply with this law.

OAE has provided a Verification of Eligibility for Public Benefit Affidavit that must be printed by the local program and distributed to all students ages 18 and over as a part of his or her initial enrollment process. The affidavit must be notarized. Applicants select from three categories of lawful presence on the affidavit. If an applicant selects qualified alien or non-immigrant, a copy of the affidavit along with supporting documentation must be submitted to the Office of Adult Education within 20 business days so that verification may be completed through the federal SAVE (Systematic Alien Verification for Entitlements) program.

If an applicant’s eligibility cannot be verified, the local program will be notified and the applicant will no longer be eligible to receive the public benefit. The local program will notify the applicant and provide him or her with notice of the right to appeal the eligibility determination. All appeals must be submitted in writing to the Office of Adult Education within 10 business days of notification. The applicant may provide additional supporting documentation of eligibility with the appeal. Refer to *Verification of Eligibility for Public Benefit Affidavit and Directions* for additional information.

**VII. Records Retention:**

Local eligible program will adhere to the Record Retention Chart which is located in the attachment section of Policy 2.3.

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