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WIOA Title II Compliance

Grants and Compliance

On July 22, 2014, the Workforce Innovation and Opportunity Act-Adult Education and Family Literacy Act (WIOA-AEFLA) was signed into law. The North Carolina Community College System (NCCCS) Office is the designated state agency responsible for the allocation of Federal and State funds under this Act. The College and Career Readiness (CCR) Unit, under the NCCCS Programs and Student Services Division, provides leadership, oversight, professional development, technical assistance, monitors and evaluates programs funded through WIOA-AEFLA grants.

On January 27, 2021, the North Carolina Office of Adult Education opened a multiyear grants competition to eligible providers as required by WIOA Title II, § 463.20. Grant funds made available under section 222 (a)(1) of the Act, to NCCCS, require a competitive grant process to award funds to eligible providers to enable them to develop, implement, and improve adult education and literacy activities within the state of North Carolina. In conducting the competitive grant process, the System Office ensures that all eligible providers have direct and equitable access to apply and compete for grants or contracts. Grant applications that successfully meet the competitive criteria will be recommended to the State Board of Community Colleges for funding beginning July 1, 2021.

A subrecipient of the funds must be an eligible institution that has demonstrated effectiveness in providing adult education and literacy activities that may include: a local education agency; a community-based organization or education agency; a volunteer literacy organization; an institution of higher education; a public or private nonprofit agency; a library; a public housing authority; a nonprofit organization that is not described previously and has the ability to provide literacy services to eligible individuals; a consortium or coalition of agencies, organizations, institutions libraries, or authorities described previously; a partnership between an employer and an entity described above. All funded providers are expected to meet or exceed the State negotiated target for measurable skill gains. An eligible applicant must have demonstrated effectiveness as required for each Title II grant (231 AEFLA, 225 Corrections, 243 IELCE). The funding authority for these grants is the Workforce Innovation and Opportunity Act (WIOA) of 2014, Title II, Adult Education and Family Literacy Act. As required by WIOA Title II, section 463.20, the North Carolina Office of Adult Education opened a multi-year grant competition. Grant funds made available under section 222 (a)(1) of the Act, to NCCCS, requires a competitive grant process to award funds to eligible providers to enable them to develop, implement, and improve adult education and literacy activities.

Recipients of Federal grants either directly or through a pass-through agency, must meet specific compliance measures as conditions of the grant award. WIOA, Title II Adult Education and Family Literacy Act funds in North Carolina are administered through the North Carolina Community College System Office, which is responsible for compliance, guidance, and monitoring. The term "compliance measures" includes, but is not limited to, the application process, financial management, time and effort reporting, cost allowability, program oversight, and audit resolution.

This page includes guidance documents, training aides, and reporting forms for the various elements of Title II, AEFLA compliance.

[WIOA Title II Providers' Guide](#)

The guidance documents linked above provide the policies and procedures required by the North Carolina Community College System, Office of Adult Education. It is recommended that all employees carefully review the documents to ensure that all processes are followed.

Risk Assessment

As part of our Federal compliance process, the North Carolina Community College, Office of Adult education is required to conduct a Risk Assessment on each provider before grant funds can be awarded. The purpose of this assessment is to furnish the NCCCS state staff with information that will help in monitoring potential risk factors associated with grants awarded to providers. A Risk Assessment for eligible subgrantees will be performed by the Office of Adult Education, State Office Staff on an annual basis prior to grant award disbursements.

Beginning in January of 2018, the CCR unit monitors all expenditures, data, and time and effort reporting according to the level of oversight indicated by the Risk Assessment conducted on all funded providers. This data may be monitored monthly, quarterly, or twice a year. These results are reviewed with the providers and may result in technical assistance, or professional development.

Budgets

WIOA, Title II funds for the Adult Education and Family Literacy Act are distributed by the North Carolina Community College System according to a formula adopted by the State Board of Community Colleges on February 16, 2018. These programs are funded under Section 231(AEFLA), 225 (C&I), and 243 (IELCE) of the Workforce Innovation and Opportunity Act (WIOA). These funds are intended to supplement an organization's adult education activities. The funding formula is the recommendation of a committee that was comprised of representatives from urban and rural community-based organizations and community colleges. Beginning with the 2018-19 award year, funding will be awarded to all eligible providers under this new formula and all grants will be awarded on a competitive basis for a four-year period. **The formula has 3 components:**

Base: 15% of available funding will be allocated for base funding to be distributed equally across providers. The base component is available to providers who received a FY 2017-18 allocation and to new providers.

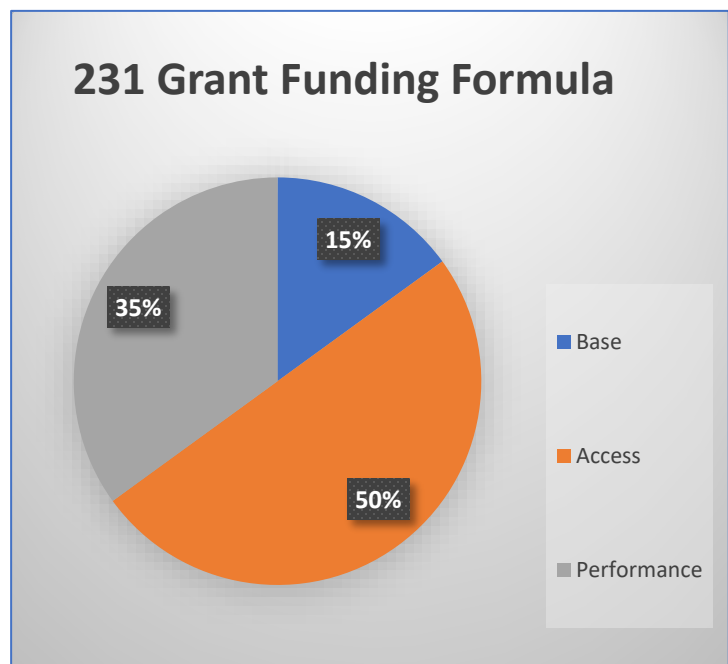
Access: 50% of available funding will be allocated for access and will be available only to providers who received a FY 2017-18 allocation and submitted data. Access will be determined by contact hours of participants within 3 weighted tiers:

Tier A – Weight 5: Beginning Adult Basic Education Literacy, Beginning Adult Basic Education, Beginning English as a Second Language (ESL) Literacy, Beginning ESL

Tier B - Weight 4: Low Intermediate ESL, High Intermediate ESL, Low Advanced ESL, High Advanced ESL, Low Intermediate Adult Basic Education, High Intermediate Adult Basic Education

Tier C – Weight 3: Adult Secondary Education Low, Adult Secondary Education High

Performance: 35% of the available funding will be allocated for performance. Performance allocations will be determined by the number and percentage of basic skills participant periods of participation with a measurable skills gain. (Under federal regulations, a period of participation begins when a participant enters the program and does not end until a participant exits the program. If a student has 12 or more contact hours during this time, the student is classified as a participant within a period of participation. Measurable skills gains are required by WIOA and are used to demonstrate participants' progress toward achieving a credential or employment.) This allocation will be available only to providers who received an allocation for the previous year and submitted data.



The NCCCS Business and Finance Division uses the list of providers who meet the competitive criteria and calculates allocations, according to the approved formula. This information is furnished to State Office Staff, and a budget item is prepared for approval by the NCCCS State Board. Upon approval, successful applicants are notified of their allocation and reporting requirements. Additionally, unsuccessful applicants are also notified in writing.

The budget documents must include all costs associated with providing literacy services to adult learners under the Title II Adult Education and Family Literacy Act (AEFLA). Please note, the budget should include both the federal and non-federal share.

For the [2023-2024 Title II Budget Training](#) presented on August 31, 2022 please see the [PD Archives](#)

[Cost Allowability Guidance](#)

Monitoring

Under WIOA, monitoring of sub-recipients (grant recipients) is a required activity annually. A description of the process and accompanying guidance documents is found below.

For the [CCR New Directors' Training Monitoring Presentation](#), please see the [PD Archives](#)

Subrecipient Monitoring

During-the-Award Monitoring

The State Office team of conducts annual reviews of sub-recipients receiving funds under each WIOA, Title II AEFLA grant program. Each provider is continuously monitored via monthly desktop reviews. In addition, under the direction of Arby Cooper, Title II AEFLA Director of Compliance, various State Office Staff conduct onsite monitoring visits.

Comprehensive Monitoring

Prior to the onsite monitoring visits, all programs that are to be monitored engage in a one-hour webinar. For reliability and consistency, a Title II program monitoring checklist is prepared annually and furnished ahead of the visit for providers. The checklist is used as a tool to ensure that all steps are completed throughout the monitoring process. A standardized monitoring template is utilized to conduct the onsite review activity. The on-site comprehensive process, as required by the Title II Adult Education and Family Literacy Act consists of:

- Required activities of the Title II AEFLA program
- The local plan as it aligns with the plan of the local WBD
- Budgeting and staffing
- Adjusted levels of performance for the core indicators.

Desk Reviews

The providers that engaged in desktop monitoring are selected based on their exceeding the state's Measurable Skills Gain (MSG) annual target. The desktop review is conducted via the Learning Management System (LMS) Moodle. Providers are required to upload and submit required documentation via the Moodle LMS. A desk review of these documents is conducted by CCR staff with the program director and other invited staff. A template is used to guide the discussions and allow providers to identify the strategies which they determine have contributed positively to their performance.

Onsite Visits and Desk Reviews

Upon completion of onsite visits and desk reviews, State Office Staff prepare a summary report which reflects the results of each review. Prior to sending the written report to programs, each summary report is submitted to the Assistant State Director for review and approval. If a Corrective Action Plan is necessary, it is indicated in the summary report and a timeline provided for completion. State Office Compliance Staff monitor the progress of each program's Corrective Action Plan (CAP) throughout the year. A shared list of programs that are to complete a CAP is maintained, to include the name of the provider,

and the completion date of the review. State Office Compliance Staff communicate frequently with providers to ensure that any findings during the monitoring process are addressed and resolved in a timely manner. To comply with the requirements of CAPs, providers must submit documented strategies regarding how they plan to correct the documented errors found during the onsite visit or desktop review. After a CAP request is issued to programs, the provider has thirty (30) business days from the receipt of the letter to respond and make any corrections. After the monitoring process is completed, all written reports and other monitoring documentation are maintained on a shared drive for at least five years.

Continuous Monitoring

XDBRs As a requirement for federally funded providers, community colleges are required to submit monthly XDBR financial documentation, which displays monthly expenditures and program activities.

- XDBR reports are due by the 15th of each month.

Requests for Reimbursement As a requirement of the Title II AEFLA grant awards, each funded Community-Based Organization is required to submit Requests for Reimbursement.

- Requests for Reimbursements are due by the 5th working day of each to month NCCCS Business and Finance Division.
- A copy of the Requests for Reimbursements are due by the 15th of each month to the CCR Department.

Time and Effort

The Time and Effort documents provide guidance about the employees that should complete and submit reports to the North Carolina Community College System Office. If Federal grant awards and/or matching funds are utilized to support salaries either in full or partially, time and effort reports must be compiled and reported.

[Monthly Reporting Policy](#)

[Semi-annual Reporting Policy](#)

Please review the documents listed below, as many will be submitted to the NCCCS System Office. Forms will be updated regularly, to ensure that providers have access to current information.

[Monthly Time and Effort Form \(updated 8/24/23\)](#)

[Semi-Annual Time and Effort Form \(updated 8/24/23\)](#)

The presentations and recordings listed are artifacts of webinars held during the program year. The presentations and recordings listed below should be used as a reference when completing required documentation.

For the [Time and Effort Recording](#); Please see the [PD Archives](#)

[Time and Effort PowerPoint](#)

The Frequently Asked Questions (FAQs) are intended to provide accurate information about topics discussed during presentations and webinars. FAQ documents will be updated regularly, to ensure that providers receive updated information.

[Time and Effort Frequently Asked Questions](#)

Technical Assistance

Providers that engage in technical assistance will review required components of their AEFLA programs, such as confirming accuracy, validity, and reliability of data collection and reporting. Additionally, the technical assistance team will engage the local program in activities that focus on a needs assessment to identify target populations, develop goals and measures that will focus on increasing adult learner achievement, and recommend the selection of research-based instructional strategies to support learning. Moreover, the technical assistance sessions will support AEFLA state funded providers with the implementation of comprehensive policies and procedures for program accountability.

The on-site technical assistance team will be comprised of State Office staff members. The assigned technical assistance team will evaluate both fiscal and programmatic information for each program year.

Resources

[State of North Carolina Unified Plan](#)

[Integration of One-Stop Partners Career Services](#)

[Workforce Innovation and Opportunity Act TITLE II—ADULT EDUCATION](#)

[AND LITERACY Blue Book](#)

[American Community Survey](#)



Contact the NCCCS State Office
Adult Education Compliance Team

		
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