

TEXAS WORKFORCE COMMISSION
Workforce Development Letter

ID/No:	WD 18-23, Change 2
Date:	March 25, 2024
Keyword:	AEL; Board Planning; WIOA
Effective:	Immediately

To: Local Workforce Development Board Executive Directors
Commission Executive Offices
Integrated Service Area Managers



From: Courtney Arbour, Director, Workforce Development Division

Subject: **Adult Education and Literacy Grant Application Review—Update**

PURPOSE:

The purpose of this WD Letter is to provide Local Workforce Development Boards (Boards) with guidance on Board review of grant applications submitted to the Texas Workforce Commission (TWC) for the Adult Education and Literacy (AEL) statewide local provider grant solicitation under the Adult Education and Family Literacy Act (AEFLA), Title II of the Workforce Innovation and Opportunity Act (WIOA).

This updated WD Letter includes the following changes to the Board Review and Comment Form (Attachment 1):

- Due date for the Section 243 Board Review and Comment form was updated.
- Questions were consolidated and renumbered to appropriately align with the Request for Applications.
- An application type section number was updated.
- Multiple Board Recommendations sections added for Boards to include suggestions about the grant application and Board plan alignment.

RESCISSIONS:

WD Letter 18-23, Change 1

BACKGROUND:

In the fall of 2023, TWC issued a grant solicitation for local AEFLA services, scheduled to begin on July 1, 2024. TWC must follow the grants award process outlined in 34 CFR §463.20, which requires that TWC consider the degree to which an applicant demonstrates alignment between AEL activities and services with the strategies and goals of the Board's local plan required under WIOA §108. The grant solicitation was posted in the [Texas Workforce Commission Procurement Portal](#).

PROCEDURES:

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

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

Board Requirements

NLF: Boards must review AEL grant applications submitted to TWC and provide TWC with recommendations related to the alignment of AEL services and activities with the Board’s local plan as set forth in 34 CFR §463.21(b).

To avoid a conflict of interest, Boards that submit an AEL grant application are exempt from this requirement. If a Board submits an AEL grant application or signs a formal letter of agreement as part of a consortium, TWC will review and determine whether it aligns with the Board’s local plan.

NLF: The Board’s executive director or designee must establish a review committee of no fewer than three Board staff members. The committee members must not represent a real, apparent, or organizational conflict of interest.

Boards must complete the following actions:

- Submit the names of the committee members to TWC via email to rfagrants@twc.texas.gov.
- Ensure that each committee member signs a Nondisclosure and Conflict of Interest statement via DocuSign, which TWC will send to each committee member.

NLF: Boards must ensure that the committee uses and completes the AEL Local Service Provider Grant RFA 32024-00017—Board Review and Comment Form (Attachment 1) to review grant applications. At least one committee member must review each grant application. The designated application reviewer(s) must complete the Board Review and Comment Form. Additionally, Boards must provide TWC with recommendations to ensure alignment with Program Years 2021–2024 Board plans as modified in 2023.

Boards must submit the completed forms to TWC via email to rfagrants@twc.texas.gov no later than 30 calendar days after TWC sends the Section 231 grant applications and no later than 20 calendar days after TWC sends the Section 243 grant applications to the Board. The Board Review and Comment forms should be sent in one email per Board. However, the committee must not score either grant applications or sections of grant applications.

NLF: Boards must consider the extent to which each grant application aligns with the Board’s local plan based on whether the applicant:

- identifies regional needs and services;
- includes the strategies and goals of the Board’s local plan;
- serves individuals in the community who have been identified in the Board’s local plan as most in need of AEL activities, including individuals who:
 - have low levels of literacy skills;
 - lack a high school diploma or its equivalent; and/or
 - are English language learners;
- serves individuals with disabilities, including individuals with learning disabilities, and individuals with barriers to employment;
- identifies the activities and services of one-stop partners;
- provides access to and promotes concurrent enrollment in Board or Vocational Rehabilitation services; and
- coordinates with community education, training, and social service resources to develop career pathways by establishing strong links among:
 - elementary and secondary schools;
 - postsecondary educational institutions and institutions of higher education;
 - Boards and Workforce Solutions Offices;
 - job training programs and social service agencies;
 - businesses and industry leaders;
 - labor, community-based, and nonprofit organizations; and/or
 - intermediaries.

NLF: Boards must be aware that eligible applicants may apply for either WIOA §231 or WIOA §243 services, or both. Each AEFLA Title II funding source requires a separate grant application and must be considered its own competition. Boards must determine whether each grant application aligns with its local plan.

TWC Actions

NLF: Boards must be aware that to facilitate the Board review process, TWC will:

- provide the narrative portion of the grant application to the committee members no later than 30 calendar days after TWC receives the grant application; and
- send the grant application to each Board if the grant application is associated with multiple workforce areas.

Note: TWC will not send grant application budgets to the Board for review. TWC will send grant applications only to Boards whose review committee members have signed a Nondisclosure and Conflict of Interest statement.

INQUIRIES:

Send inquiries regarding this WD Letter to aelpolicy.clarifications@twc.texas.gov.

ATTACHMENTS:

Attachment 1: AEL Local Service Provider Grant RFA 32024-00017—Board Review and Comment Form

Attachment 2: Revisions to WD Letter 18-23, Change 1, Shown in Track Changes

REFERENCES:

Workforce Innovation and Opportunity Act, Title II, Adult Education and Family
Literacy Act
34 CFR §§463.20–34