

Request for Grant Application Guidelines Integrated English Literacy and Civics Education Program (061)

For services offered with the following funding:
Workforce Innovation and Opportunity Act, Title II, (Federal Adult Education and Family Literacy
Act) Section 243

March 2020



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
333 Market Street
Harrisburg, PA 17126-0333
www.education.pa.gov



Commonwealth of Pennsylvania

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TABLE OF CONTENTS

Table of Contents

Integrated English Literacy and Civics Education Program Grant (061)	2
1. INTRODUCTION.....	2
2. GENERAL INFORMATION	2
Program Purpose	2
Minimum Program Requirements.....	2
Integrated English Literacy and Civics Education Program Planning Documents	3
Specific Requirements for Integrated Education and Training Activity	3
Special State-Imposed Grant Conditions	3
Eligible Applicants	4
Establishing Demonstrated Effectiveness.....	4
Eligible Program Participants	6
Funding Priorities	6
Federal WIOA Title II Requirements.....	7
Grant Terms and Conditions	7
Multi-Year Contracts.....	7
Program Funding Requests.....	7
Grant Application Components.....	7
Narrative	8
Agency Information	8
Budget.....	8
Application Review.....	8
Grant Award Selection and Notification Process	9
Appeal Process.....	9
3. GRANT REQUIREMENTS	9
4. GRANT TIMELINE	10
5. AWARD WINNERS	10
Grant Agreement.....	10
Funding Accountability and Transparency.....	11
General Program and Fiscal Requirements.....	11
APPENDIX A	12
Scoring Summary.....	12

Integrated English Literacy and Civics Education Program Grant (061)

1. INTRODUCTION

Section 243 of the Federal Adult Education and Family Literacy Act, Title II, Workforce Innovation and Opportunity Act (WIOA) provides funds to be awarded through the Pennsylvania Department of Education (PDE), Bureau of Postsecondary and Higher Education, Division of Adult Education (division) to provide Integrated English Literacy and Civics Education programming. The total federal funding available for awards to provide Integrated English Literacy and Civics Education programming under this Request for Grant Applications (RGA) is approximately \$1.7 million. This amount is based on the estimated federal grant award for Fiscal Year (FY) 2020 as established in the United States Department of Education's [state tables](#) and is subject to change.

2. GENERAL INFORMATION

Program Purpose

As stated in WIOA, funds allocated under section 243 are to be used for grants for integrated English literacy and civics education in combination with integrated education and training activities. Each program that receives funding under this application shall be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and integrate with the local workforce development system and its functions.

Minimum Program Requirements

Full details regarding all minimum requirements established by PDE for Integrated English Literacy and Civics Education Program 061 programs are available in the *Adult Education and Family Literacy Program Guidelines*.

Successful applicants for Integrated English Literacy and Civics Education Program 061 grant funds will demonstrate the capacity to provide activities required under section 243. Integrated English Literacy and Civics Education programs funded under section 243 must have the following requirements established by PDE:

- Year-round leveled, managed enrollment integrated English literacy and civics education classroom activities and support services, including during the summer. Integrated English literacy and civics education activities must support Integrated English Literacy and Civics Education Program participants to prepare for and transition successfully to the integrated education and training activity and to earn a high school equivalency credential, if needed, as part of the training activity. As defined in WIOA, integrated English literacy and civics education activities include all of the three components in combination: English language acquisition activities, literacy activities, and civics education (instruction in the rights and responsibilities of citizenship and civic participation).
- At least one integrated education and training activity, which must be held a minimum of once per program year. All students who enroll in the integrated education and training activity must have completed at least one session of integrated English literacy and civics education activities before enrolling in the integrated education and training activity.
- Agency-specific performance targets established through negotiation with the Division of Adult Education, which the program meets in each year of the grant cycle.

- Support services to help students address barriers to participation.
- Support services to help students identify education and career goals, develop employability skills, and successfully participate in and complete postsecondary education/training and gain employment.
- Integration of workforce preparation activities into instruction and support services.
- A plan for ensuring student access to grant activities, including participation in the integrated education and training activity.
- A program administrator who is a full-time employee of the grantee agency. If the program administrator is not working 100 percent on division-funded activities, the agency must provide evidence that this individual has sufficient time allocated to these activities to meet all of the requirements of the program administrator position. (Note: The program administrator does not have to be paid from grant funds; however, the person must have sufficient time allocated to activities supported by the grant.)
- Partnership at a local PA CareerLink® site and fulfillment of all the roles and responsibilities of a one-stop partner, including entering into a Memorandum of Understanding (MOU) with the local board, contributing to infrastructure costs of the PA CareerLink® site, providing access to grant services through the PA CareerLink® site, and providing career services to eligible one-stop participants.
- Integration with the local workforce development system and its functions to place participants in the Integrated English Literacy and Civics Education Program in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.
- Signed partnership agreement with a training provider to deliver the training portion of the integrated education and training activity.

Integrated English Literacy and Civics Education Program Planning Documents

Applicants should use the *Integrated English Literacy and Civics Education Checklist*, the *Integrated Education and Training Checklist*, and the *Integrated Education and Training Proposal* to guide their grant applications. The documents are posted on the [Division of Adult Education Grant Competitions](#) webpage. Successful applicants will be required to submit the completed *Integrated English Literacy and Civics Education Checklist* and the completed *Integrated Education and Training Checklist* as part of the grant approval process. No grant will be approved until the applicant has submitted documentation that meets division approval.

Specific Requirements for Integrated Education and Training Activity

The integrated education and training activity proposed by the applicant must meet federal regulations for the activity and additional requirements imposed by the Division of Adult Education. Programs must get the integrated education and training activity approved by the division before they can start the classes in the integrated education and training activity. Programs must use the *Integrated Education and Training Proposal* to submit the plan for the integrated education and training activity. Final approval of the integrated education and training activity will require a signed MOU or other contract with the occupational training provider. The MOU or contract must specify the roles and activities that each party will fulfill and must include a budget for any grant funds to be paid to the training provider.

Special State-Imposed Grant Conditions

All successful applicants under this RGA that also received funding under section 243 of WIOA in the 2018-2020 grant cycle must:

1. Have a fully approved plan for the integrated education and training activity by September 1, 2020. Failure to have an approved plan for the integrated education and training activity by the deadline will result in suspension of payments until an approved plan is in place.

2. Hold at least one integrated education and training activity by the end of the first program year or they will be determined not to have met the contract obligations and the grant agreement will be terminated for cause.

In addition, successful applicants under this RGA that also received funding under section 243 of WIOA in the 2018-2020 grant cycle **and that, as of July 1, 2020, have unresolved findings or an outstanding corrective action plan from the Integrated English Literacy and Civics Education Program monitoring visit during 2019-20** must also meet or exceed all of the agency-specific targets negotiated with the Division of Adult Education during the first year of the grant. Failure to do so will result in termination of the grant for cause.

Successful applicants that have not received prior funding under section 243 must have a full plan for the integrated education and training activity submitted to and approved by the division no later than January 1, 2021. Failure to have an approved plan for the integrated education and training activity by the deadline will result in suspension of payments until an approved plan is in place. Successful applicants who have not received prior funding under section 243 that do not have an approved plan in place by the end of the first program year will be placed on probation for the second year of the grant cycle and will not receive second year funds until a plan is in place. Continued failure will result in termination of the grant agreement for cause.

Eligible Applicants

As defined in WIOA, an eligible provider is an organization that has demonstrated effectiveness in providing adult education and literacy activities that may include:

1. A local education agency;
2. A community-based organization or faith-based organization;
3. A volunteer literacy organization;
4. An institution of higher education;
5. A public or private non-profit agency;
6. A library;
7. A public housing authority;
8. A non-profit institution that is not described in any of the above and has the ability to provide adult education and literacy activities to eligible individuals;
9. A consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described above;
10. A partnership between an employer and an entity described above; and
11. Other organizations not listed above.

For the purposes of the competition in Pennsylvania, a consortium or coalition of agencies will be defined as a main grantee with one or more subgrantees. The main grantee will serve as both the fiscal agent for the grant and a provider of some of the services proposed in the grant application. The main grantee is responsible for ensuring that all activities provided are completed as proposed and is responsible for monitoring and compliance of the subgrantees. Applicants cannot subcontract with another applicant for a portion of the proposed services. Agencies can only be a main grantee or a subgrantee. Answers in the Narrative and Agency Information sections of the grant application should reflect the work of the consortium/coalition rather than treat each entity separately.

Establishing Demonstrated Effectiveness

For the purposes of establishing demonstrated effectiveness to qualify as an eligible provider for section 243 funding, an applicant must provide performance data on its record of improving the

skills of eligible individuals, particularly eligible individuals who have low levels of literacy, information regarding its outcomes for participants related to employment, attainment of a secondary school diploma or its equivalent, and transition to postsecondary education and training. An applicant that has been previously funded under Title II of WIOA must submit performance data required under section 116 of WIOA. An applicant that has not been previously funded under Title II of WIOA must provide performance data to demonstrate its past effectiveness. Each individual agency in a consortium or coalition of agencies must be an eligible provider by itself (i.e., must be an organization that has demonstrated effectiveness in providing adult education and literacy activities) and must individually provide all of the data required to establish demonstrated effectiveness.

PDE will require applicants to provide quantitative data for the immediate preceding two program years. The data provided by the applicant to establish demonstrated effectiveness must include the following:

1. The number of individuals in the outcome cohort (i.e., the denominator);
2. The number of individuals who achieved the outcomes (i.e., the numerator); and
3. The resulting percentage of individuals who achieved the outcome.

The tables that applicants will use to provide data for the purposes of establishing demonstrated effectiveness to qualify as an eligible provider are on the [Division of Adult Education Grant Competitions](#) webpage. Applicants must download and complete the appropriate table and then upload the completed document into the *Demonstrated effectiveness to determine eligibility* section in the application in eGrants. In the case of a consortium or coalition of agencies, each agency must complete a table with its own data and each table must be uploaded separately.

PDE has established the following thresholds for an applicant to be determined to be an eligible provider for the purposes of this section 243 Integrated English Literacy and Civics Education 061 grant competition:

1. A total number of individuals in ESL levels greater than 30 in each of the two years.
2. A denominator greater than 5 for each of the following outcomes, *Attain a high school diploma or its equivalent*, *Transition to employment*, and *Transition to postsecondary education or training* in each of the two years.
3. The overall percentage of individuals in the six ESL levels combined who improved English language proficiency must be greater than 30 percent in each of the two years.

Prior to reviewing and scoring submitted applications, PDE will review the information provided by each applicant, including each agency in a consortium or coalition of agencies, to establish demonstrated effectiveness to determine if that applicant is an eligible provider. Only applications that are determined to be from eligible providers will be reviewed, scored, and considered for funding. In the case of a consortium or coalition of agencies, all agencies in the consortium or coalition must be determined to be eligible providers. Applicants that are not able to establish demonstrated effectiveness under the criteria above are not eligible providers and their applications will not be reviewed, scored, and considered for funding. Any applicants that are determined not to be eligible providers will be notified of that decision.

PDE reserves the right to require successful applicants to submit documentation in support of the information provided to establish demonstrated effectiveness.

Eligible Program Participants

Successful applicants will provide integrated English literacy and civics education activities in combination with integrated education and training activities to individuals who meet eligibility criteria. An eligible individual is defined by WIOA as an individual:

1. Who has attained 16 years of age;
2. Who is not enrolled or required to be enrolled in secondary school under state law and;
3. Who is:
 - a. Basic skills deficient;
 - b. Does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or
 - c. Is an English language learner.

Among the eligible participants, PDE believes that participants who have a postsecondary and/or employment goal and who enter the section 243 program at one of the six National Reporting System ESL educational functioning levels as determined by an approved official assessment may benefit most from the services under section 243. This includes participants who posttest at Exit Criteria for ESL and are then assessed at ABE/ASE levels while participating in the section 243 program.

Funding Priorities

In awarding funds, PDE will prioritize funding, through the review and rating process, to grant applications from eligible providers with past effectiveness in high quality services that improve the skills of eligible participants and help those participants to earn high school equivalency credentials, gain and retain employment, and/or transition to postsecondary education/training. PDE will prioritize funding for those applications that demonstrate a thorough and detailed plan for a section 243 integrated English literacy and civics education program aligned with local needs that meets all of the minimum requirements and provides:

- Evidence of the applicant's organizational capacity to meet all of the programmatic, reporting, administrative, and fiscal requirements of the grant.
- High-quality instruction that is based on best practices and the *College and Career Readiness Standards for Adult Education* and is of sufficient intensity to lead to student outcomes.
- Services that align with the strategies and goals of the local workforce area as defined in the local plan and with the activities and services of the PA CareerLink® site partners.
- High-quality student support services that help students to persist and succeed in adult basic education services and meet their personal, educational, and career goals.
- An excellent description of need, including evidence of a sufficient number of individuals with the interest in and ability to complete the offered occupational training with the support of the integrated education and training activity at some point during the grant cycle.
- An explanation of how the need was determined and how the applicant determined that the integrated English literacy and civics education program is the best way to address this need.
- A detailed description of planning including working with local workforce partners and social service agencies serving the target population.
- Proposed targets for enrollment in the Integrated English Literacy and Civics Education program; enrollment in the integrated education and training activity; completion of the integrated education and training activity, including attaining any related credential necessary for employment; educational functioning level gain based on pre-/posttesting;

attainment of employment in an occupation directly related to the occupational training; attainment of a high school equivalency credential that are ambitious and align with the funding requested. Higher costs per student will require higher targets.

Federal WIOA Title II Requirements

WIOA Title II establishes requirements for the grant competition process, including items that must be addressed in the grant applications and items that PDE must take into consideration when awarding grants. In addition, section 427 of the General Education Provisions Act requires applicants to describe the steps they will take to ensure equitable access to, and participation in, the grant-funded program. This RGA and the questions in the grant narrative are designed to ensure that all necessary information is included. The Division of Adult Education strongly encourages applicants to refer to *Programs and Activities Authorized by the Adult Education and Family Literacy Act (Title II of the WIOA) — Final Rule §463.20 and §463.22* when completing the grant application.

Grant Terms and Conditions

Multi-Year Contracts

Successful grant applications will be approved for a three-year grant cycle. Grant funds for the second and third years be awarded through a notification of funding contingent on the availability of funds. Each year's renewal option, grant conditions, and grant amounts will be based on the following criteria:

1. Contract compliance, including success in meeting contracted enrollment and providing the contracted services;
2. Evidence of sufficient progress in meeting the targets proposed in the grant application and finalized through negotiation with PDE;
3. Evidence of continuous program improvement;
4. Compliance with fiscal and programmatic policies and guidelines; and
5. The amount of the appropriation.

Programs that fail to sufficiently address the above criteria or any additional conditions imposed on individual grants may be terminated prior to the end of the grant cycle.

Program Funding Requests

Programs should apply for those funds necessary to meet the grant requirements, provide the proposed services to the number of students they can serve based on need and interest in the service area, and meet the proposed targets. This can include the costs associated with the development and implementation of the integrated education and training activity. PDE requires programs to provide a 25 percent match, and applicants should consider that requirement when determining funding requests. PDE reserves the right to adjust the actual grant award amount of successful applicants during the grant contract approval process to be appropriate for the proposed activities.

Grant Application Components

The Integrated English Literacy and Civics Education Program 061 grant application consists of three sections: Narrative, Agency Information, and Budget. Guides will be provided that review how applicants create and complete a grant application.

Narrative

The narrative provides evidence of past effectiveness, analysis of need, details of program delivery, and other information relating to coordination, collaboration, and program improvement. The narrative is the basis for analysis of the applicant's ability to provide the required education services. Online contextual help is available for each question in the application narrative by clicking on the **Help icons** in eGrants.

Agency Information

The Agency Information section provides detailed information regarding staff qualifications, program site(s) and schedule, proposed contracted enrollment and participation, assurances, and program contact information. The information provided in this section will be rated for its alignment with and support of the information provided in the narrative. Online contextual help is available by clicking on the **Help icons** in eGrants.

Budget

The budget demonstrates fiscally sound allocation of funds to successfully provide education services. Applicants should ensure that their budget proposal accurately and fully supports the proposed work and activities in the grant. The information in the budget will be rated for its alignment with and support of the information provided in the narrative and applicant information sections. It will also be reviewed for accuracy against the budget information in the guidelines. Online contextual help is available for each question in the renewal application budget by clicking on the **Help icons** in eGrants.

When completing the budget, refer to the *Adult Education and Family Literacy Guidelines* Section 600 for fiscal guidance and information on grant limitations, cost functions and object codes, and local match.

Application Review

All Integrated English Literacy and Civics Education Program 061 applications will be reviewed except those disqualified for one or more of the following reasons:

1. Entity submitting the application does not meet the definition of Eligible Applicants.
2. Application is incomplete.
3. Applications not completed by the application deadline. Completion will be determined by the time the eGrants system records that the program completed the application by marking all sections complete and clicking the "Complete" button.

Grant applications will be reviewed and scored by teams of no fewer than three individuals comprised of staff from PDE, other commonwealth agencies, and/or peer reviewers. Peer reviewers will be non-applicants who have experience in related activities. Reviewers will be screened for conflicts of interest and will not benefit financially from grant awards. In addition, after receiving the grant applications through eGrants, PDE will submit all applications for funds under Title II of WIOA to the appropriate local workforce boards for review for consistency with the local plans. PDE will take the results of the review and any recommendations to promote alignment into consideration when making grant awards. This process ensures compliance with WIOA regulations §463.21.

Depending on the number of applications either a weighted method or a Z-scoring method will be used. In the weighted scoring method, a single team reviews and rates all applications. In the Z-scoring method, applicants are distributed to several teams for review and rating. Scores are then calculated using a standard deviation formula which evens out high and low raters.

Grant Award Selection and Notification Process

Reviewers will use an application review guide to review and score applications. Applications will be funded from highest scoring to lowest scoring based on the following criteria:

1. A minimum score of 170, and
2. Availability of funds.

Applications with a score of less than 170 will not be funded regardless of availability of funds. The Division of Adult Education will notify each applicant of the outcome of the review process and whether its application will be funded. Applications that are selected for award as a result of the application review and scoring process may require revisions or submission of additional information during the contract review and approval process.

Appeal Process

If an eligible provider disputes the funding decision, it has a right to appeal the decision to the Pennsylvania Secretary of Education. The appeal will be considered in accordance with the procedural rules set forth under 34 C.F.R. § 76.401(d) and 1 Pa. Code § 35.1 et seq., the General Rules of Administrative Practice and Procedure. A final decision of the Pennsylvania Secretary of Education may be appealed to the U.S. Secretary of Education under 34 C.F.R. § 76.401. The appeal of this decision must be received by the Pennsylvania Secretary of Education within 30 days of the mailing date of this decision at the following address:

Pedro Rivera
Secretary of Education
Pennsylvania Department of Education
333 Market Street, 10th Floor
Harrisburg, PA 17126-0333

3. GRANT REQUIREMENTS

1. Grant applications will be submitted through the [eGrants](#) system.
2. For access to the eGrants system and the related grant opportunities, prospective applicants should send an email to ra-able@pa.gov with the subject line "Division of Adult Education grant competition." In the body of the email, prospective applicants should state the agency name and the agency's intent to apply for an Integrated English Literacy and Civics Education Program grant. Prior to sending the email, the applicant should search for the agency record in the PDE Education Names and Addresses ([EdNA](#)) database.
 - a. Agencies found in EdNA should include in their email their Administrative Unit Number (AUN) and contact information for the individual at the agency who will create and complete the grant application.
 - b. Agencies not listed in EdNA should indicate in the email that they are not in the state database and provide contact information for the agency administrator who will work with division staff to establish a listing and be assigned an AUN.
 - c. Under extraordinary circumstances affecting an agency's access to the eGrants system, the requirement to submit the grant application via eGrants may be waived. Eligible applicants who believe they have such circumstances should contact the Division of Adult Education at ra-able@pa.gov prior to the application due date to discuss an alternative submission process. Please note that the application deadline in bullet 5 below applies to any alternative submission process.
3. For the purpose of planning, writing, and submitting applications, this document should be used in conjunction with information presented during the grant bidders' webinar. Applicants

should also review this information in conjunction with the division guidelines and policies and the eGrants application to develop a complete understanding of the intent and requirements of the application process.

4. Questions regarding the Integrated English Literacy and Civics Education Program grant application process must be sent to ra-able@pa.gov. Division of Adult Education staff will periodically post responses to submitted questions on the Department of Education website for all applicants to review.
5. Application Deadline: Eligible applicants must submit their proposal to PDE by April 15, 2020, 12:00 PM (noon). All sections must be marked complete (evidenced by a check mark next to each section) and the complete button must be chosen.

4. GRANT TIMELINE

Dates	Activity
March 9, 2020	Grant Application Guidelines Available
March 16, 2020	IELCE 061 Grant Applications Available (open)
April 15, 2020, 12:00 PM (noon)	IELCE 061 Grant Completion Deadline (close)

5. AWARD WINNERS

As indicated above in the section *Integrated English Literacy and Civics Education Program Planning Documents*, successful applicants are required to submit and have approved specific documents as part of the grant approval process. In addition, to complete the grant award process, applicants under consideration for acceptance are required to provide proper signatures to the grant agreement and complete the Funding Accountability and Transparency form located in the grant in eGrants.

All contract components are produced by eGrants. Each will be accessed at the [eGrants website](#) and will consist of the following:

1. Grant Agreement Signature Page;
2. Appendix A – Special Program Terms;
3. Appendix B – Grantee’s Program Narrative(s) and Budget(s); and
4. Appendix C – Payment Terms, Responsibilities, and Contact Information.

Grant Agreement

1. The Grant Agreement is a binding agreement between PDE and the eligible grant award recipient. The beginning and ending date of the project, total amount of funds, and project number will appear on the grant agreement.
2. There must be an electronic signature or a manual signature in blue ink on the original copy of the Grant Agreement. Stamped signatures are not acceptable on the original copy.
3. Agencies approved for eSignature can electronically sign the Grant Agreement. The authorized signatory must be in the eGrants system in order to electronically sign contracts.
4. Agencies not approved for electronic signatures must print the first page of the grant agreement from eGrants, have it signed in blue ink by the authorized representative(s) and mail it to the division. The signature page should arrive no later than ten business days after the grant is submitted. All manually signed grant agreement signature pages should be mailed to:

Pennsylvania Department of Education
 Bureau of Postsecondary and Adult Education
 Division of Adult Education
 333 Market Street, 12th Floor

Harrisburg, PA 17126-0333

- The authorized signer(s) must be (an) authorized representative(s) of the agency as described below:

Agency	One Authorized Representative	Two Authorized Representatives
School District	Superintendent	
Intermediate Unit	Executive Director	
Career & Technical School	Director	
Charter School	Chief Executive Officer	
University, College, or Community College	President	
Public Library	Director	
Community-Based Organizations and Corporations		President or Vice-President AND Secretary or Treasurer

- Changes to the grant agreement language will require review and approval by PDE, Office of Chief Counsel, the Office of General Counsel, and the Attorney General’s office and will cause delays in approving the agreement.
- Per Management Directive 215.9, amended October 15, 2015, staff of the division will determine whether the applicant has delinquent tax debt or other conditions as specified in the State Contractor Responsibility Program. Any related issues must be resolved before the grant agreement will be reviewed and approved.
- Applications recommended by division staff for approval are then reviewed by the Deputy Secretary, the Office of Chief Counsel, and the Comptroller’s Office. Upon approval from the Comptroller’s Office, the contract is considered fully executed. The fully executed contract with supporting documentation is uploaded to the Treasury website and to the final reporting section of the grant in eGrants. The status of an application can be verified in the eGrants system. The status will change to “Completed” once the grant is fully executed.
- After complete review and approval by PDE and the Comptroller’s Office, an approved and fully executed grant agreement will be available in eGrants.

Funding Accountability and Transparency

Grantees must complete the Funding Accountability and Transparency form located in eGrants.

- Grantee must maintain current registration in the [System for Award Management](#) (SAM) at all times during which they have active federal awards funded pursuant to this agreement. A [Dun and Bradstreet](#) Data Universal Numbering System (DUNS) number is required for registration in SAM.
- The applicant must complete the FAAT form that is located in eGrants.
- The following information is required on the FAAT form: DUNS number or DUNS number + 4 if applicable; city, state and zip code +4 digit extension of the primary location; county where the greatest amount of the grant award will be expended; and compensation of officers is necessary if grantee received more than 80 percent of federal funds in the preceding fiscal year.
- The commonwealth will not process a grant until the grantee provides this information.

General Program and Fiscal Requirements

Award winners are subject to all applicable state and federal administrative requirements, cost principles, and audit requirements, which are incorporated into each grant award by reference.

Such requirements include, but are not limited to:

- *Adult Education and Family Literacy Guidelines*
- All Bureau of Postsecondary and Adult Education, Division of Adult Education policies
- eData Manual and Glossary
- [PDE Master Standard Terms and Conditions](#)
- [Education Department General Administrative Regulations \(EDGAR\) 34 Code of Federal Regulation \(CFR\) Parts 75, 76, 77, 79, 81, 82, 84, 86, 97, 98, and 99 as amended on December 19, 2014](#)
- [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

APPENDIX A

Scoring Summary

Section	Maximum Score
Description of Need	26
Agency structure and capacity	21
Program design	30
Program improvement and data	25
IELCE instruction	15
IET instruction	30
Student identification and support	26
Digital literacy and technology	10
Alignment with workforce	12
Past effectiveness	20
Agency information	10
Budget and budget narrative	20
Total	245

Minimum acceptable score = 170