

Workforce Innovation and Opportunity Act (WIOA)

Adult Education and Family Literacy Act, WIOA Title II, Idaho State Plan- March 2020

This plan covers activities authorized under Title II of WIOA, known as the ‘Adult Education and Family Literacy Act.’ The Eligible Agency responsible for carrying out activities funded under Title II is the Division of Career & Technical Education.

This plan covers the following topics regarding Adult Education and Literacy programs in Idaho:

- a) **Aligning Content Standards:** A description of the content standards used in Idaho’s Adult Education program and how those standards align with Idaho’s adopted challenging academic content standards for K-12 education.
- b) **Local Activities:**
 - i. *How Idaho funds eligible providers:* A description of the competitive grant application process used to identify and fund Adult Education providers in Idaho.
 - ii. *Adult Education Activities in Idaho:* A description of the allowable activities, as defined in Title II.
 - iii. *Scope, Sequence, and Organization of Local Activities:* A description of how allowable activities are carried out by providers.
- c) **Corrections Education and Other Education of Institutionalized Individuals:** A description of which additional or specific activities are allowable for providers offering instruction to institutionalized individuals (as defined in Section 225 of Title II).
- d) **Integrated English Literacy and Civics Education:** A description of the established programs authorized under Section 243.
- e) **State Leadership:** A description of how the state expends funds authorized under Section 223 to support required and optional State Leadership Activities, including alignment with other programs, professional development, technical assistance, and monitoring and evaluation.
- f) **Assessing Quality:** A description of how the State assesses the quality of providers of Adult Education, including assessing program quality, data collection and analysis, program improvement, and assessing professional development.

(a) Aligning Content Standards

Idaho’s Adult Education program has formally adopted the College and Career Readiness (CCR) Standards for Adult Education, as developed by Susan Pimentel and MPR Associates for the US Department of Education in 2013. As stated in the introduction to the standards, the CCR Standards represent a subset of the Common Core State Standards, which are “most indispensable for college and career readiness and important to adult students.”

The Idaho Department of Education (K-12) has adopted the Common Core State Standards for mathematics and English language arts for K-12, also known as the Idaho Core Standards. Because both the Idaho Core Standards and the CCR Standards for Adult Education are derived from the Common Core State Standards, they are well aligned. In the case that Idaho’s K-12 standards are revised, replaced, or otherwise changed, the State’s Adult Education program will realign its standards appropriately.

(b) Local Activities

i. How Idaho Will Fund Eligible Providers

As the Eligible Agency administering Title II programs, the Idaho Division of Career & Technical Education awards AEFLA funds through a competitive grant application process. Please refer to section III.b.5.B.i—ii in the *common-elements* portion of Idaho’s Combined State Plan for more detailed information about the Title II competitive grant application process.

Eligible grant recipients, as detailed in Section 203(5), are any organizations that have demonstrated effectiveness in providing adult education and literacy activities, which may include:

- A. A local educational agency,
- B. A community-based organization or faith-based organization,
- C. A volunteer literacy organization,
- D. An institution of higher education,
- E. A public or private nonprofit agency,
- F. A library,
- G. A public housing authority,
- H. Other nonprofit institutions that have the ability to provide adult education,
- I. A consortium or coalition of entities listed in (A)-(H), and
- J. A partnership between an employer and an entity listed in (A)-(H)

Funds are awarded as multi-year grants on a competitive basis to eligible providers via regional competitions. All regional competitions use the same process and application materials issued by the State to ensure direct and equitable access. The competition is announced across a variety of platforms to ensure statewide participation. These platforms include local newspapers, the States’ monthly newsletter, press release, social media, and contacts with other state and local agencies and workforce partners.

The regional competitions adhere to the provisions set forth in WIOA Title II Section 231 – *Grants and Contracts for Eligible Providers*, and Section 232 – *Local Applications*. Grantees receiving funds under the initial competition are required to submit annual extension plans and negotiate program budgets each year, until the State deems it necessary to issue a new competition for the state or a particular region. By federal law, eligible providers are prohibited from using federal grant funds to supplant state or local dollars.

The competitive application process requires applicants to document their qualifications per each of the thirteen considerations set forth in Section 231(e). Information is collected via a State-issued Request for Grant Applications (RFGA). The information collected from each applicant in the RFGA may include, but is not limited to:

- **Documentation of eligibility** per Section 203(5)
- **Type of Adult Education Program(s) and/or Activities to be funded**, limited to those activities allowed in Title II of WIOA and set forth in this plan
- **Alignment with Idaho’s Combined State Plan** including state strategies and goals, career pathways, and local one-stop alignment.
- **Administrative capacity** such as: organizational structure, funding streams, financial oversight, data collection and reporting, and assurances
- **Operational capacity** such as description of qualified staff and hiring processes, available locations and classroom space, community partnerships, and number of Title II-eligible students served per year.
- **Quality of Services** such as proposed class schedules, description of curriculum and alignment with state-adopted standards, and professional development/training activities.

- **Demonstrated Effectiveness** such as past targets and actual performance for previous Title II recipients. For applicants who have not previously received funding under Title II, the Eligible Agency will define and provide examples of other qualifying data that can be provided to demonstrate the applicant’s effectiveness in serving basic-skills deficient individuals, including success in achieving the outcomes required under Section 116 of WIOA.

The Idaho Division of Career & Technical Education distributes funds awarded under Title II, as set forth in WIOA Section 222(a). The State distributes funds at:

1. Not less than 82.5% of the grant funds to award grants and contracts under Section 231 (Eligible Providers) and to carry out section 225 (Programs for Correctional and Institutionalized individuals), of which not more than 20% of such amount shall be available to carry out section 225.
2. Not more than 12.5% of the grant funds to carry out State leadership activities under section 223; and
3. Not more than 5% of the grant funds or \$85,000, whichever is the greater, for the administrative expenses of the eligible agency (the State).

ii. Adult Education Activities in Idaho

As one of six core programs under the Workforce Innovation and Opportunity Act (WIOA), the Adult Education and Family Literacy Act (AEFLA) program plays an integral role in the workforce development system by providing access to educational services for adult learners. The program seeks to increase opportunity in the educational and workforce development of adults as workers, parents, and citizens. While playing a critical role in adult attainment of a secondary school diploma, the program also aims to assist in the transition to postsecondary education and training through career pathways.

As the eligible agency to receive WIOA Title II (AEFLA) funds in Idaho, the Division of Career & Technical Education requires that each eligible provider support programs and services only to eligible individuals who meet the following criteria:

1. Have attained 16 years of age;
2. Are not enrolled or required to be enrolled in secondary school under State law; and
3. Are—
 - a) Basic skills deficient;
 - b) Do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
 - c) Are English language learners.

The purpose of Adult Education in Idaho is to enable eligible providers that receive grants under the program to create local partnerships to provide adult education and literacy activities that:

1. Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency;
2. Assist adults who are parents or family members to obtain the education and skills that
 - a) Are necessary to becoming full partners in the educational development of their children;
 - b) Lead to sustainable improvements in the economic opportunities for their family;
3. Assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training, including through career pathways;
4. Assist immigrants and other individuals who are English language learners in
 - a) Improving their—
 - i. Reading, writing, speaking, and comprehension skills in English; and
 - ii. Mathematics skills; and

- b) Acquiring an understanding of the American system of government, individual freedom, and the responsibilities of citizenship; and
- 5. Provide educational programs for criminal offenders in correctional institutions and for other institutionalized individuals who are likely to leave the correctional facility within five years of participation in the program

Activities considered for funding in Idaho under WIOA are described below (in alphabetical order). Such activities must be provided in compliance with the definitions provided in statute:

- **Adult education (Sec 203.1) and literacy (Sec 203.13)**—Adult Education is defined as academic instruction below the postsecondary level that increases an individual’s ability to (a) read, write, and speak in English, and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent, (b) transition to postsecondary education and training and (c) obtain employment. Such activities must be designed to build and improve literacy, where literacy is defined as an individual’s ability to read, write, and speak in English, compute, and solve problems at levels of proficiency necessary to function on the job, in the family, or in society.
- **English language acquisition programs (Sec 203.6)**—instruction designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language, and that leads to either (1) attainment of a secondary school diploma or recognized equivalent and transition to postsecondary education and training, or (2) employment.
- **Integrated Education and Training (Sec 203.11)**—a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. In order for a program receiving funds under Title II to offer such activities, they must allow students to access all three components concurrently. Title II funds cannot be used to provide *workforce training* in the absence of adult education and literacy activities. Workforce preparation and workforce training may be provided through concurrent enrollment in qualifying training activities provided under Title I-B of WIOA.
- **Integrated English Literacy and Civics Education (sec 203.12 and Sec 243)**—education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enable such learners to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.

Providers may offer such activities as stand-alone services or concurrently with Adult Education and Literacy Activities as an allowable activity funded under Section 203(2).

Providers offering programs funded under Section 243 must offer the activities defined in the previous paragraph concurrently with an integrated education and training component. Please refer to part (d) below for additional information and examples of a qualifying Integrated English Literacy and Civics Education programs. *Programs funded under Section 243 must offer the activities defined in the previous paragraph and offer access to a qualifying IET program for appropriate students.*

- **Workplace Adult Education and Literacy (Sec 203.16)**—any of the activities described in this list which are offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.
- **Workplace Preparation (Sec 203.17)**—activities designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills including competencies in utilizing resources, using information, working with

others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

Historically, Idaho has not supported Family Literacy Activities, as defined in Section 203(9), with federal Title II or matching state funds, due to the limited amount of funding available. However, providers are encouraged to support such activities through partnerships, shared expertise and professional development, and collaborative planning. Additionally, local programs are allowed to use non-matching local funds to support such Family Literacy activities where necessary and appropriate.

Providers offering multiple activities may offer those activities as stand-alone services, enroll students in such activities concurrently as part of a broader education plan, or offer a combination of such allowable activities within the scope and sequence of a single program or service (for example, using contextualized workplace preparation content as part of reading and math curricula, or including math and reading skills as part of an English language acquisition class). Both the Integrated English Literacy and Civics program funded under Section 243, and Integrated Education and Training activities defined in Section 203(11), must offer certain activities concurrently, per the definitions below, in order to qualify for funding under Title II.

The type of activities offered in each region depends on the needs of the populations being served. Programs are expected to provide those activities that are appropriate to meet the needs of the populations in their region, without duplicating services. When submitting applications for funds to support these activities, applicants are required to provide rationale for each activity for which funds are being requested, including data that demonstrates a need for the activity in their service region.

iii. Scope, Sequence, and Organization of Local Activities

Funded activities may be carried out through a variety of program models, provided that such models offer quality instruction for adult learners that is of sufficient intensity and duration to achieve student learning goals, and is aligned with the State's Adult Education standards (see part (a)). Example models include single and mixed-level classroom instruction, study labs, tutoring, and guided distance/digital learning.

The State will ensure appropriate scope, sequence and organization of activities by soliciting specific information in the application process. Applicants are asked to describe the overall scope of their program, including which activities they provide and how those funded activities function together as part of a larger framework to provide clear pathways for students into further education and employment. Applicants for funding under Title II are also required to describe:

- **The process used for designing or adopting curriculum, and/or the curriculum to be used,** including a general description of materials and how such curriculum aligns with the State Standards described in part (a). Alignment with these standards is required for Adult Education and Literacy activities defined in Section 203(1) and 203(13). Additionally, programs applying for funds under Section 243 are required to describe how their curriculum addresses the rights and responsibilities of citizenship.

Programs are also asked to indicate what and how other standards or frameworks are used to develop their curriculum for workplace readiness and integrated education and training activities. Such additional standards may include the Employability Skills Framework developed by the US Department of Education, industry-defined standards, or secondary and postsecondary CTE standards developed by the State. While not required, alignment with these types of high-quality standards for workplace readiness, occupational skills, and integrated education and training are being considered advantageously in awarding grants.

- **The frequency, intensity and duration of instruction.** This includes a description of the type of instruction (e.g. literacy, secondary, college transition, English language, civics), how often classes meet, how long classes meet (one hour, three hours, etc), and the format of the class (e.g. in person, online, lab, tutoring). Programs also indicate whether classes are managed or have open enrollment. For managed enrollment classes, a complete description also includes the class enrollment period (number of weeks or months). Applicants are required to explain how the structure and organization of their activities provides sufficient opportunities for sustained educational skill development.
- **The quality of instruction, including the quality of instructors.** This includes a description of how teachers are hired and trained, as well as any professional development that is provided to instructors. It also includes a description of how applicants measure, assess, and evaluate instructor and instructional quality.

(c) Corrections Education and Other Education of Institutionalized Individuals

The Idaho Division of Career & Technical Education uses no more than 20% of funds awarded to eligible providers to support programs under section 225 for incarcerated and institutionalized individuals. Grant funds are awarded to an eligible provider that offers applicable services to incarcerated or institutionalized individuals. Funds are awarded using a competitive application process outlined in part (b (i)) above, after which, providers may request funds on an annual basis through an extension application.

The State requires that any eligible provider using Title II funds to carry out programs authorized under section 225, give priority to those offenders who are likely to leave the correctional institution within five years of participation in the program.

Correctional programs may use funds to carry out activities as authorized under Section 225, including:

1. Adult Education and Literacy (as defined in part (b) above)
2. Special education, as determined by the eligible state agency administering the grant
3. Secondary school credit
4. Integrated education and training
5. Career pathways
6. Concurrent enrollment
7. Peer tutoring and
8. Transition to re-entry initiatives and other post-release services with the goal of reducing recidivism.

The type of activities offered by correctional service providers depends on the needs of the populations being served. Programs are expected to provide those activities, which are appropriate to meet the needs of the populations in their facility. For example, short-term facilities (such as county jails) should prioritize activities that can have a meaningful impact in a short amount of time and help meet a student's re-entry needs. Longer-term facilities (such as state prisons) may choose to focus on longer, more intensive education programs for students who will be incarcerated for multiple years.

When submitting applications for funds to support activities authorized under Section 225, applicants are required to provide rationale for each activity for which funds are requested, including data that demonstrates a need for the activity in their facility.

(d) Integrated English Literacy and Civics Education Program

Adult Education providers in Idaho have long-standing English Language and Civics programs under WIA, which have historically performed well. Programs in Idaho have built on this success to establish and operate Integrated English Literacy and Civics Education (IELCE) programs under WIOA. The State is collaborating with local providers to build on existing best practices while expanding and/or implementing new workplace training components, as necessary.

In Idaho, IELCE funds are awarded to eligible providers through a competitive application process outlined in part (b(i)), after which, providers may request funds on an annual basis through an extension application. Funds are used to support the operational expenses of local IELCE programs, including teacher salaries and benefits, classroom supplies, textbooks, and other items necessary to carry out instruction.

Services provided through Section 243 must include education services that enable adult English language learners to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Programs must include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training. Additionally, Section 243 IELCE program must provide access to integrated education and training (IET).

As part of the IELCE program requirements, each program that receives funding under Section 243 must be designed to 1) provide access to integrated education and training; a service approach that provides adult education and training concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement; (2) 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 (3) integrate with the local workforce development system and its functions to carry out the activities of the program,

Given the diversity of students, employers, and service providers throughout Idaho, the exact mechanism for each IELCE program is left to the discretion of the eligible provider based on the needs of that community. The program plan and budget for all such activities are reviewed and approved by the State to ensure they meet the purpose and requirements of the law.

(e) State Leadership

The State distributes no more than 12.5% of Title II funds allocated to the state to carry out required and permissible leadership activities, as required under Section 223. While the state reserves the right to carry out any of the permissible activities authorized under Section 223, the permissible activities listed below will be the primary focus.

Required activities supported with Leadership funds:

- Align adult education and literacy activities with other core programs and one-stop partners, including eligible providers, to develop career pathways and provide access to employment and training services for individuals in adult education and literacy activities.
- Establish or operate high-quality professional development programs to improve the instruction provided pursuant to local activities, including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the specific needs of adult learners, instruction provided by volunteers or by personnel; and disseminate information about models and promising practices related to such professional development programs.
- Provide technical assistance to eligible providers including the dissemination of instructional and programmatic practices based on research, the role of eligible providers as one-stop partners, and the use of technology to improve system efficiencies.

- Monitor and evaluate the quality of, and improvement in, adult education and literacy activities, and disseminate information about models and proven or promising practices within the State.

Permissible activities supported with Leadership funds:

- Develop and disseminate curricula, including curricula incorporating the essential components of reading instruction as such component relate to adults
- Develop content models for integrated education and training and career pathways.
- Provide technical assistance regarding the use of data to measure the progress of programs, evaluate program effectiveness, and guide program improvement, especially as such data relates to the State's adjusted levels of performance described in section 116.
- Develop and implement transition programs, including linkages with postsecondary education institutions
- Integrate literacy and English language instruction with occupational skill training, including linkages with employers
- Develop and pilot strategies for improving teacher quality and retention.

Alignment with Other Core Programs

Two key strategies for program alignment, as identified in Idaho's Combined State Plan, Section (II)(c)(2), supports this requirement. The first is to establish a WIOA Advisory Group comprising key state-level staff from each of the programs covered by the plan. The purpose of the WIOA Advisory Group is to coordinate operational policies and partnerships at the state level between programs covered under the Combined State Plan. The WIOA Advisory Group will work with regional coordinating groups and with local programs to ensure consistency in the application of program policy throughout the state and to help local programs overcome operational and policy-related barriers to full collaboration.

The State Coordinator for Adult Education is a member of this group and will provide technical assistance to local Title II providers as needed. Leadership funds may be used, as appropriate and allowable, to support local staff in attending any training or meetings hosted by the State to provide such technical assistance to local staff and leadership.

The second strategy identified in Idaho's Combined State Plan is to coordinate training across workforce programs to enhance opportunities for professional growth and development. This might include, for example, inviting local Vocational Rehabilitation staff to training on adult learning styles, or inviting local Adult Education staff to training by Wagner-Peyser/Employment Service staff on the use of Idaho's Career Information System to help students identify potential careers. Title II Leadership funds may be used, as appropriate and allowable, to support Adult Education program staff in attending such training.

High Quality Professional Development Programs

Given Idaho's large geography and relatively small population, local Adult Education programs have historically been spread far apart. As a result, it is expensive and time consuming for local staff to travel to centralized training. The State has therefore designed a three-tiered approach to professional development in Idaho. The first tier is state-level training, the second is local routine/required training, and the third is local discretionary training. All levels of training are supported with State Leadership funds under section 223.

State-level training, while not mandatory, is highly encouraged for all programs. The State generally chooses one or two such training options per year, these trainings will be centrally located and host a larger cohort of participants (20-30). These trainings will focus on instructional topics or practices, which will have the greatest impact for the most number of attendees across the state. In the past, this has included nationally recognized trainings like the Adult Numeracy Institute. To the extent that it is

feasible, the State will prioritize trainings that use a model of sustained contact between trainers and a cohort of teachers throughout the year. This may include multiple in-person meetings, online discussion groups, and opportunities to try new practices in the classroom between meetings. However, the exact model of such trainings will depend on the needs and resources identified in the State each year.

More routine and required training, such as new teacher onboarding, training on the NRS and data collection, and assessment training, have been, and will continue to be handled locally. Under WIA, each program identified a staff member or members to serve as expert trainers, and employed a professional-development coordinator to track training needs and participation. This model has worked well, and will continue under WIOA. The State will provide guidance on the frequency and content of such local training and will host refresher trainings for these local trainers and PD coordinators as appropriate. The State may also explore options that allow programs to collaborate on such trainings, as well as tools that will help centralize the development and storage of training materials for use by multiple programs.

Finally, local programs can also apply for discretionary funds to support local professional development projects. Such projects should be aligned with local needs and supported with evidence. For example, a local provider may determine through teacher evaluation and observation that training on the use of contextualized reading would help improve instructional quality at its outreach centers. The program would then create a training plan and request funds from the State to support this plan.

Technical Assistance

The State provides technical assistance, as appropriate, based on the needs and performance of local providers. Such assistance may be provided directly to one program, or may be provided for the entire state. Such assistance may include:

- Technical assistance for establishing transition programs, team teaching, and other areas where Adult Education programs connect with other core and partner programs and the One-Stops
- Guidance from WIOA Advisory Group to ensure policy alignment between programs, training and technical assistance on these policies and their impact on programs
- Training as needed or requested to address new and relevant technology in the classroom

Monitoring and Evaluation

The State will use a variety of methods to monitor and evaluate the quality of adult education and literacy activities. Such methods will include on-site monitoring, quarterly desk audits, continuous data-quality monitoring, annual program plans, and annual reports.

The State will make every reasonable attempt to conduct an on-site monitoring visit to each local provider at least once every three years. Such visits may occur more frequently if warranted by program performance or compliance issues, or if requested by a program. Monitoring will include a review of processes, practices and documentation related to program finances, administration, data collection, and instruction. A complete monitoring tool will be developed by the State to facilitate such visits and ensure consistency across programs.

Programs will also be evaluated based on regular submission of reports, applications, and program plans to the State. The State will monitor program data-quality through the use of the State's Management Information System. Technical assistance will be provided on an ongoing, as-needed basis regarding compliance, program quality, and data quality. Leadership funds will be used to support training and other activities resulting from such evaluations.

Programs that are found to be out of compliance with State or Federal policies or law, or which have demonstrated unacceptable administrative practices or consistently low performance will be subject to a Corrective Action Plan. "Consistently low performance" will be determined based on actual performance

against program indicators, the extent to which state targets are met, past performance of the program, the relative performance of other providers, and mitigating program circumstances. Programs which fail to implement a Corrective Action Plan as determined necessary by the State may be subject to loss of funds.

(f) Assessing Quality

The State assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Local providers are accountable to the State to meet the standards of quality for administration and instruction outlined in the competitive grant application, certifications, assurances, and state policy. The effectiveness and quality of local providers is assessed through the use of performance data aligned with the indicators of performance set forth in WIOA Section 116, as well as the evaluation and monitoring processes described in part (e) above.

Assessment of Program Quality

Local programs are assessed based on the six performance indicators set forth in Section 116 of WIOA and pursuant to federal regulations and guidance. These six indicators are:

1. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
2. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
4. The percentage of program participants who obtain either a recognized postsecondary credential or a secondary school diploma, or its equivalent, during participation in or within one year of exit from the program
5. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains towards such a credential or employment; and
6. The indicators of effectiveness in serving employers established pursuant to clause (iv).

Each year, the State is required to negotiate the above-defined percentages with the US Department of Education for the upcoming program year (July 1 – June 30). Local programs are expected to meet or exceed the state targets and report on their performance in an annual report submitted to the State.

Data collection and analysis

In order to determine the levels of performance under each of the indicators listed above, local programs are required to collect data through a standard collection process (including standardized assessments), input data into the statewide Management Information System on a regular basis, and analyze data for the purpose of performance reporting and program improvement. Programs must adhere to all state and federal policies when collecting student data.

Programs are expected to use this data to determine progress toward meeting the State targets. Programs are also expected to use such data to evaluate program effectiveness and align program improvement efforts.

Program Improvement

In the case that a provider has consistently low success in achieving the negotiated levels of performance, the State may require the program to implement a Program Improvement Plan. To the extent that such a plan includes professional development and training, allocable costs of such training may be provided for with state leadership funds under section 223.

Assessing Professional Development

The State has a vital interest in assessing the quality of programs funded under Title II, and in providing adequate professional development and technical assistance to those programs in order to ensure continuous improvement. To that end, the State currently implements certain measures to assess its professional development activities. These measures are outlined:

- **Professional Development Coordinators:** Each local program is required to identify a staff person to identify local training needs, organize and implement local training, track staff attendance at both state and local trainings, collect training evaluations, and provide an annual report to the State regarding the program's professional development activities. The State will support the time spent on these activities through Leadership funds.
- **On-site Evaluations:** All statewide training and professional development shall include evaluation forms to solicit feedback from participants about their experience, what they learned, what was effective, what could be improved, and what they are likely to implement when they return to their local program. The State will review this feedback and make adjustments as needed.
- **Follow-up Evaluations:** To the extent that such follow-up is appropriate and feasible, the State will ask for follow-up evaluations from participants of statewide trainings three months after the conclusion of the event to assess whether practices have been implemented and sustained.
- **Ongoing Performance Review:** Both the State and local programs will review performance data on a regular and ongoing basis. Such review will take into account federal reporting tables, student outcomes, attendance, measurable skill gains, and other factors. This review will occur regularly, but at a minimum must occur each quarter. The information gained from these performance reviews will help the State and local programs identify areas that are improving and those areas which demonstrate gaps or a decline in performance.

The results of the above assessment activities will be used when considering the effectiveness of past professional development. These results will also inform future training and the types of professional development activities the State will offer or require.