# WIOA Title II: Adult Education and Family Literacy Act Notice of Funding Opportunity Applicant Information Session Submitted Questions and Answers

#### **In-Person Information Session Questions**

#### Program Income

Income estimates: if you are going to base those possibly charging a tuition based on what you get for your allocation amounts can you then resubmit the budget request or would that need to be done on a status update? Which status update would it be? Beginning of year or end of year?

In accordance with 2 CFR 200.307, applicants intending to earn program income must estimate and report it in the AEFLA Budget Narrative Directions, along with a detailed explanation in the AEFLA Budget Narrative. Applicants must account for program income using the Addition method, as outlined in 2 CFR 200.307(b)(2).

Per 34 CFR 76.534, tuition and fees collected from students cannot be counted toward federal matching, cost-sharing, or maintenance of effort requirements. Additionally, fees charged to students participating in a federally supported adult education program must be collected equitably and set at levels that do not adversely impact economically disadvantaged students. Applicants collecting program income must ensure full compliance with all applicable laws and regulations.

The budget application must identify, estimate, and account for anticipated program income. The application budget should estimate the annual program income and show how that income will be used by the program before other grant funds are expended, as required by 2 CFR 200.307(a). The application does not include a status update, only the budget form and budget narrative should be completed. The total award request should include any anticipated program income. After awardees are selected and award amounts determined, a final program year 2025 budget will be negotiated with the awardee and entered into Iowa Grants, per section "Estimated Award Amount" in the NOFO. No budget amendment or status update is required.

If the college general fund buys ELL textbooks and ELL students buy from the college at cost (no more or less), is that program income? (Financial assistance available)?

Yes, the gross income from selling textbooks counts as program income, per 2 CFR 200.307(c). However, discounts, rebates, and credits are not considered program income. Ensure compliance with all relevant financial regulations when reporting program income.

## Funding percentages

If you request 15% and it's negotiated, do you set the budget to assume that amount or do you write it for the 5% and then revise it if you get the increased 15?

Application budget should be completed using the total admin percentage requested (even if above 5%). If the admin percent is about the 5% max, a justification for the higher admin rate

must be attached to the application budget narrative. Grantee contribution will be designated from federal funds reserved for local administration and will not exceed 5% of the grant award. In cases where five percent is too restrictive to allow for administrative activities, the eligible agency may increase the amount that can be spent on local administration. In such cases, the eligible provider must negotiate with the eligible agency to determine an adequate level of funds to be used for non-instructional purposes. An eligible provider receiving a grant or contract under this part may consider costs incurred in connection with the following activities to be administrative costs:

(a) Planning;

(b) Administration, including carrying out performance accountability requirements;

(c) Professional development;

(d) Providing adult education and literacy services in alignment with local workforce plans, including promoting co-enrollment in programs and activities under title I, as appropriate; and

(e) Carrying out the one-stop partner responsibilities described in  $\frac{6}{5}$  678.420, including contributing to the infrastructure costs of the one-stop delivery system.

The grantee further agrees that the local contribution to infrastructure costs, in addition to local federal administrative costs, may include non-federal resources that are cash, in-kind, or third-party contributions.

The negotiation process will be included with award notifications.

If you currently have 15% do we renegotiated that and if so has the negotiation process changed?

Yes, follow above. Grantee contribution will be designated from federal funds reserved for local administration and will not exceed 5% of the grant award. In cases where five percent is too restrictive to allow for administrative activities, the eligible agency may increase the amount that can be spent on local administration. In such cases, the eligible provider must negotiate with the eligible agency to determine an adequate level of funds to be used for non-instructional purposes. An eligible provider receiving a grant or contract under this part may consider costs incurred in connection with the following activities to be administrative costs:

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(e) Carrying out the one-stop partner responsibilities described in  $\frac{6}{5}$  678.420, including contributing to the infrastructure costs of the one-stop delivery system.

The grantee further agrees that the local contribution to infrastructure costs, in addition to local federal administrative costs, may include non-federal resources that are cash, in-kind, or third-party contributions.

The negotiation process will be included with award notifications.

Can required 5% of 231 be personnel costs?

All associated costs for developing and implementing the IET can be included in the 5%. However, the full 5% cannot be personnel costs to develop IETs. Awardees will be required to spend a minimum of 5% of federal funds awarded on the provision of IET. (State requirement). The costs attributed must be related to IETs.

Can the 5% include IELCE, not just IET? In other words, does IELCE count towards this 5%?

*No, IELCE is a separate award amount from 231 funds. Awardees will be required to spend a minimum of 5% of federal Sec. 231 funds awarded on the provision of IET. (State requirement).* 

Is the 15% admin cost negotiation process changing? Remaining the same?

*In accordance with WIOA Sec. 233(b), awardees may negotiate with IWD in order to determine an adequate level of funds to be used for non-instructional purposes.* 

Application budget should be completed using the total admin percentage requested (even if above 5%). If the admin percent is about the 5% max, a justification for the higher admin rate must be attached to the application budget narrative. Grantee contribution will be designated from federal funds reserved for local administration and will not exceed 5% of the grant award. In cases where five percent is too restrictive to allow for administrative activities, the eligible agency may increase the amount that can be spent on local administration. In such cases, the eligible provider must negotiate with the eligible agency to determine an adequate level of funds to be used for non-instructional purposes. An eligible provider receiving a grant or contract under this part may consider costs incurred in connection with the following activities to be administrative costs:

(a) Planning;

(b) Administration, including carrying out performance accountability requirements;

(c) Professional development;

(d) Providing adult education and literacy services in alignment with local workforce plans, including promoting co-enrollment in programs and activities under title I, as appropriate; and

(e) Carrying out the one-stop partner responsibilities described in  $\frac{6678.420}{5}$ , including contributing to the infrastructure costs of the one-stop delivery system.

The grantee further agrees that the local contribution to infrastructure costs, in addition to local federal administrative costs, may include non-federal resources that are cash, in-kind, or third-party contributions.

The negotiation process will be included with award notifications.

#### Match

Allowable match requirement in the NOFO said it can include any nonfederal and nonstate dollars and nonstate was removed from the presentation today.

Yes, State and any non-federal source of funds may be used to meet the match requirement as long as the activities are considered allowable under AEFLA.

Does required 1:1 local match now exclude state funding? NOFO included non state, presentation did not say non state.

No, see above response.

Are we allowed to use state funding for matching funds to federal grant?

Yes, see above response.

#### State Funds Allocation/Federal Funds Amounts

Do we have an anticipated state allocation for budget planning?

This application is for federal AEFLA base (231 and 225 funds) and IELCE (243 funds) only. Any state allocations are determined separately based on the availability of funds appropriated by the state legislature.

How do total federal allocations compare to previous years?

As stated in the applicant information session, U.S. Department of Education typically releases their estimated funding levels for adult education to states in mid-April. The amount of federal allocations is unknown at this time.

Are state funds something we expect and for what allocation amounts? College funding formula to distribute those funds or something else?

This application is for federal AEFLA base (231 and 225 funds) and IELCE (243 funds) only. Any state allocations are determined separately based on availability of funds appropriated by the state legislature.

With state funding are we to assume that we will be awarded state funding with a federal allotment as that changes federal if we don't know if it will be awarded as state?

This application is for federal AEFLA base (231 and 225 funds) and IELCE (243 funds) only. Any state allocations are determined separately based on the availability of funds appropriated by the state legislature.

## Application and NOFO

WIOA Consideration 5 said you could include an attachment there is no place in the application in Iowa Grants, same with the W9 is there a place to upload?

The attachment upload for the WIOA 13 considerations is located on FY2026 (PY25) AEFLA WIOA Section 231, 225, & 243 Add'l Information Form (Program Flexible Schedule) and the W9 upload is on the FY2026 (PY25) AEFLA Fiscal and Budget Application.

TE Table 5 data is not populated and needed for demonstrated effectiveness?

Data specialist should verify their access to NRS federal reporting tables. If access is missing, they should contact their appropriate system administrator to ensure access is granted.

Where is signature page and is it by mail or electronic submission?

The lowa Grants user who submits the application is considered to be the signatory on the application. No separate signature page will be uploaded and submitted with the application. In the past, this signature page was related to applicable terms and conditions of the grant. Once the awardees are notified, a sub-grantee contract, which will include terms and conditions, will follow capturing all necessary signatures.

Do all providers get notified when questions are answered through Iowa Grants?

The Iowa Grants users who submitted the question will receive a notification once the answer has been posted. All questions received and answered are posted within the funding opportunity for all users to review. Reference the "Ask A Question" Desk Aid for directions on how to find the question-and-answer summary within Iowa Grants.

I know Iowa Grants doesn't like links/images, if I include a link will it be copied, pasted, and looked at by grant managers/reviewers?

The Applicant may not provide additional attachments beyond those specified in the NOFO for the purpose of extending their response. Additional materials not requested will not be considered part of the proposal and will not be evaluated.

Data from past two years does this include PY23/24 and PY24/25 or PY22/23 and PY23/24?

The prior two years includes July 1, 2022-June 30, 2023 and July 1, 2023-June 30, 2024.

I noticed on the considerations there's multiple questions but only one box per consideration at 3000 characters, do you think that's enough characters to clearly define the objectives within the consideration?

The Applicant is asked to be brief and concise in responding to the Notice of Funding Opportunity questions and instructions. Each narrative response is limited to 3,000 characters (approximately 500 to 1000 words).

## Other

Has this grant been awarded to any community-based ed. programs/small nonprofits, that you could share a success story about? Asking because the majority of applicants are c. colleges.

Awardees on the current grant cycle are all classified as Institutions of Higher Education. Community-based organizations may be eligible applicants assuming demonstrated effectiveness is met. Many community-based organizations have been awarded adult education funds in other states and territories around the country.

Was any community-based organization awarded this type of grant in previous grant cycles?

Awardees on the current grant cycle are all classified as Institutions of Higher Education. We are unaware of the types of organizations awarded grant funds prior to 2020.

Family Literacy Activities? WIOA Consideration 5.

FAMILY LITERACY ACTIVITIES.—The term "family literacy activities" means activities that are of sufficient intensity and quality, to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children's learning needs, and that integrate all of the following activities: (A) Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency. (B) Interactive literacy activities between parents or family members and their children. (C) Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children. (D) An age-appropriate education to prepare children for success in school and life experiences.

Is representation on state board from p13 the Local Workforce Development Board?

This reference comes directly from 34 CFR 463.22. Adult Education is represented on the State Workforce Development Board in accordance with federal law and state code. However, please provide a response based on how you would work with your local workforce development board.

Will STAR training be offered next year?

In accordance with the State Plan, a plan for facilitating STAR training is being developed for the coming program year.

Are there specific guidelines for allocation request in regard to Appendix estimates?

Application budgets and allocation requests should be based on funding estimates in Appendices B - D and the counties in which you propose to provide services. Federal funding will be allocated in accordance with the Iowa Unified State Plan.

Website has old assessment policy is there a PY25 version?

The PY25 Assessment Policy has not been approved by OCTAE and is not effective until July 1, 2025. Once it is approved by OCTAE, it will be made available on the IWD website. The Program Year 2024 Assessment Policy on the IWD website is the most current, approved version.

NOFO has broken links.

While we have made very effort to have active links these can change often. There is a useful links document included in Iowa Grants.

2 year contract versus 5 years. Why the change?

AEFLA requires a multi-year grant cycle. A 2-year grant cycle for this current opportunity allows for better alignment with the WIOA State Plan process.

Why the cuts to IELCE funding?

No cuts to IELCE funding was released in the NOFO. As stated in the applicant information session, U.S. Department of Education typically releases their estimated funding levels for adult education to states in mid-April. The amount of federal allocations is unknown at this time.

Why is this competition timeline so short, particularly compared to past years?

*In 2020, the original application window was 50 days. That application window was extended due to the COVID-19 pandemic. This year's grant application window is 48 days.* 

Will the PY 23/24 risk assessment be considered in this grant application review? If so, either way, why did we not receive risk assessment this year?

Applicants shall take careful note that in evaluating a proposal submitted in response to this NOFO, the Department will consider materials provided in the proposal, information obtained through interviews/presentations (if any), and internal Departmental information of previous contract history with the Applicant (if any). The Department also reserves the right to consider publicly available information in evaluating an Applicant's experience and capabilities.

Fiscal Year 25 (July 1, 2024 – June 30, 2025) Risk Assessment is pending review.

**Virtual Information Session Questions** 

Will this slide deck be shared with those who registered for this presentation?

A recording of the Virtual Applicant Information Session along with the slide deck is posted on the IWD website.

[Organization name redacted] is not necessarily interested in being a primary applicant but would be interested in working with a primary provider as a subcontractor to reach the target population since we work with that population in various communities across the state. Are there any particular requirements for subcontractors under this award?

All applicants selected for an award will be a subrecipient of IWD per 2 CFR 200. Any entity who does not wish to be a direct subrecipient should not apply. Each subrecipient has the ability to determine if they would like to utilize a subcontractor or subrecipient to execute their award. This information should be included in the application, including within the application budget. This is different than a consortium application. A consortium must have one entity as a lead applicant, this entity will be the subrecipient of IWD. The consortium application must include the legal agreement between consortium members that establishes the consortium and details the roles and responsibilities of each consortium member. IWD will grant all awarded funds to the lead consortium members. Additionally, the lead consortium entity will be the sole entity

responsible for all reporting for the entire award. Each consortium member must meet the eligibility criteria as outlined in the NOFO.

All subrecipients must meet and follow all rules of the Act and federal regulations.

## Match

Can programs use state funds as part of the 1:1 match?

Yes, state and any non-federal source of funds may be used to meet the match requirement as long as the activities are considered allowable under AEFLA.

Match requirement on page 7: any match has to be non-federal and non state in NOFO not presentation.

State and any non-federal source of funds may be used to meet the match requirement as long as the activities are considered allowable under AEFLA.

Pg 7 Allocated state funds from legislation is that going away is there a requirement for 1:1 in other ways? Asking for clarification.

State and any non-federal source of funds may be used to meet the match requirement as long as the activities are considered allowable under AEFLA.

There is a discrepancy on the NOFA, on page 5 it says state dollars can be used as match and on page 7 it says non-state funds.

State and any non-federal source of funds may be used to meet the match requirement as long as the activities are considered allowable under AEFLA.

## Allocations

(Pg 26 Appen B allocations) Can you share what allocation method was used for the county allocation estimates?

The allocations were based upon previous Department of Education RFPs and are for informational purposes. Historical data from the Department of Education was used to populate Appendices B - D. Federal funding will be allocated in accordance with the Iowa Unified State Plan.

Will 231 funds be allocated out based upon whatever this allocation formula is in appendix B vs a budget or are our funds not based on the county allocation?

Application budgets and allocation requests should be based on funding estimates in Appendices B - D and the counties in which you propose to provide services. Federal funding will be allocated in accordance with the Iowa Unified State Plan.

## Funding percentages

It says that professional development for 231 should be budgeted in admin funds; in past have only budgeted out of state professional development and in state was budgeted out of instruction AEFLA.

Professional development is not an allowable instructional expense, regardless of the location where the professional development takes place. Professional development is considered part of administration funds according to WIOA Sec. 233 Local Administrative Cost Limits.

Grantee contribution will be designated from federal funds reserved for local administration and will not exceed five (5) percent of the grant award. In cases where five (5) percent is too restrictive to allow for administrative activities, the eligible agency may request to increase the amount that can be spent on local administration. In such cases, the eligible provider must negotiate with the eligible agency to determine an adequate level of funds to be used for noninstructional purposes. Application budgets should be developed and submitted using the total anticipated administrative cost percent, even if above five percent. This will be negotiated as part of the contracting process with each awardee. An eligible provider receiving a grant or contract under this part may consider costs incurred in connection with the following activities to be administrative costs:

(a) Planning;

(b) Administration, including carrying out performance accountability requirements;

(c) Professional development;

(d) Providing adult education and literacy services in alignment with local workforce plans, including promoting co-enrollment in programs and activities under title I, as appropriate; and

(e) Carrying out the one-stop partner responsibilities described in  $\frac{6}{5}$  678.420, including contributing to the infrastructure costs of the one-stop delivery system.

The negotiation process will be included with award notifications.

## Other

Is there a "latest date" that the NOFO may be updated and changed due to changes in government priorities?

It will be up to the applicant to ensure the federal law or U.S. Supreme Court decision controlling at the time the response to the NOFO is due will control relevant requirements.

Is there a physical signatory page this year, or is it all in Iowa Grants?

The lowa Grants user who submits the application is considered to be the signatory on the application. No separate signature page will be uploaded and submitted with the application. In the past, this signature page was related to applicable terms and conditions of the grant. Once the awardees are notified, a sub-grantee contract, which will include terms and conditions, will follow capturing all necessary signatures.

Previously Student Achievement STAR in Reading training opportunities were provided by the state. Is that something that will continue in the future?

In accordance with the State Plan, a plan for facilitating STAR training is being developed for the coming program year.

I want to clarify how IWD is defining enrollment. Are you referring to all students, regardless of attendance hours (above versus below 12 hours)? Or, are you referring only to countable students (those with 12+ hours)?

*"Enrollment" means those who achieve participant status of a pretest and a minimum of 12 hours of instruction, in alignment with NRS table 1 for reporting.* 

Pg 7 Confirming this would be for 231 & 243.

We are unsure of what the question is and therefore are not able to provide a response to this statement.