# 2023-24 AELA Local Data Assurances

## (Insert Fiscal Agent Name)

Introduction

To ensure educational and workforce services are provided at the highest levels of quality for Adult Education and Literacy Act (AELA), the Office of Adult Education Initiatives (AEI) has drafted the following assurances.

Applicants are required to sign and agree to these assurances in order to be eligible and considered for AELA funding. Therefore, the following must be signed and submitted concurrently with an applicant’s grant proposal. Agreement to these assurances ensure applicants commit to follow applicable federal and state laws regarding AELA.

### Local Data Procedures Assurances

Data collection and reporting are essential components of the accountability system for grantees. AELA grantees are required to use the statewide data reporting system, LACES. They must initial, sign, and agree to all of the following assurances to be eligible for AELA funding. A grantee’s completion of this form indicates that the grantee takes legal responsibility for upholding the requirements included in this procedure and it is understood that a violation of these assurances could result in grant termination.

Grantees not able to comply with any part of these assurances should coordinate with the AEI team to create a plan to come into compliance. Persistent compliance issues with these assurances will result in targeted technical assistance, program improvement planning, and, if needed, corrective action.

Requirements in these assurances are subject to change as federal and state reporting requirements and guidance are updated.

### 1. Local LACES System Administrator Duties

The grantee must assign a staff person to be the Local LACES System Administrator. The Primary or Secondary Contacts on each grant will receive AEI Updates, and all AEI updates and LACES announcements must be shared with the Local LACES System Administrator and any other relevant data entry staff.

The Local LACES System Administrator must:

* Read weekly AEI Updates emails.
* Attend all AEI LACES System Administrator trainings (or view recordings).
* Complete the data assurances Moodle course and knowledge check with a score of 80% or higher.
* Coordinate with program staff to develop local standard operating procedures for collecting and reporting data.
* Ensure all staff are properly trained in the use of LACES and the requirements of these Data Assurances.
* Manage all user access to the grantee’s LACES database by sending email requests for new users or to disable users to AEI’s Data Coordinator.
* Document all staff in LACES through the creation of a staff record; update staff records when required.
* Ensure that data errors in the LACES monitoring searches are corrected or documented through comments in learner records by the deadline indicated by your AEI Program Coordinator.
* Respond to/address potential errors identified in LACES data monitoring reports by the second Friday of each month.
* Share reports, data updates, data resources, and training opportunities with relevant staff at the local program.
* Provide data for the completion of all required reports.

**Initial: \_\_\_\_\_**

2. Intake/Registration Data Entry

The grantee must ensure that learners complete orientation or are otherwise provided adequate information about the grantee’s programs and services, in order to make an informed decision about enrollment into the program before completing the full intake form. Other registration forms collecting directory information only may be used prior to orientation for the purposes of marketing, outreach, and recruitment.

The grantee must ensure all learner intake/registration forms contain all state-required fields. The grantee must use the [Sample AEFLA, IELCE, & AELA Intake Form](https://www.cde.state.co.us/cdeadult/grantees/laces-data-dictionary/intake), or an alternate form of their own design as long as all required data components are included.

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Grantees must submit their intake/registration form to the AEI Office for review annually with the completed assurances and anytime changes are made to the intake/registration form.

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All learner intake/registration forms must be reviewed by the grantee for completeness and accuracy before entering the data into LACES, including but not limited to checking for existing learner records before creating new learner records (to prevent duplicates in LACES).

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The grantee must ensure all learner intake/registration forms are entered into LACES within a week from the time the learner is first assessed or enrolled into classes. For learners completing the intake form but never assessed or enrolled into classes, the form must still be entered into LACES. Grantees are encouraged to enter intake forms for these learners weekly.

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The grantee must ensure all intake data is reviewed and updated for returning and continuing learners each new Fiscal Year and must ensure any changes to returning and continuing learner intake data are entered in LACES before learners return to programming or classes.

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* Grantees must identify a learner’s funding stream when they begin classes. Funding stream selections should be based on the CDE grant funding (including match funding where applicable) that is used to pay for services the learner receives. This includes but is not limited to intake and orientation services, assessment, materials, building costs, and both instructional and non-instructional staff costs.
	+ If a learner’s funding stream changes after intake, grantees must not remove a previously recorded funding stream unless that funding stream was recorded in error. Once a learner receives services during the program year with any funding stream, that funding stream must remain in the learner’s record through the end of the program year.
	+ In cases where the learner’s funding stream was initially reported in error, grantees may later change that but must add a General Comment in the learner’s record to describe why the learner’s funding stream is later being changed.

**Initial: \_\_\_\_\_**

3. Assessment Data Entry

If using NRS assessments, the grantee must ensure all NRS assessment data is entered into LACES no less than 1 week after test administration. This includes all NRS tests administered to AEFLA learners regardless of the context (e.g., remote tests, incomplete tests, tests given on the wrong form or subject, tests with a testing disruption, tests invalidated for cheating, tests resulting in an out of range score, tests where learners reported guessing, early post-tests, same form post-tests, etc.).

* For assessment data entered into LACES more than 2 weeks passed the date it is required to be reported, grantees must add a Late Data Entry comment in the learner or class record in LACES. The comment must indicate what data was entered late and any known cause for that late data entry.
* Grantees must analyze late data entry comments no less than annually to identify improvements to their local data collection and reporting procedures.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

Tests may be manually entered into LACES, or, for CASAS and TABE, they may be externally imported into LACES from the test vendor’s system.

* For manually entered assessments:
	+ Before manually entering assessments in LACES, grantees must first check to ensure the test record does not already exist (to prevent duplicates).
	+ Before manually entering assessments in LACES grantees must review them for accuracy including checking to make sure the assessment is being reported under the correct student ID/learner record in LACES and that the correct subject areas, levels, series, forms, scores, and assessed dates have been recorded.
	+ Before manually entering assessments in LACES where the test was administered by a partner organization the grantee must verify the test administration met the requirements outlined in the state’s [Assessment Policy](https://www.cde.state.co.us/cdeadult/grantees/handbook/assessment).
* For externally imported assessments:
	+ Grantees must ensure that learner records are created in LACES and that the demographics for learners reported in LACES and test vendor’s systems must match in order for tests to automatically ingest daily. Alternatively, grantees may report the CASAS Student Code or DRC Student ID for learners in LACES so that tests can automatically ingest daily.
	+ Grantees must ensure that all CASAS and TABE tests administered on paper and not entered into/scored in the test vendor’s system are manually entered into LACES as these will not automatically ingest.
	+ Grantees must ensure that all CASAS and TABE tests triggering a same form or early post-test error are manually entered into LACES as these will not automatically ingest. This includes re-tests for an out of range score which trigger an early post-test error flag.
	+ Grantees must review the All Assessments screen in LACES weekly when testing is occurring to ensure that tests expected to import from external sources into LACES are ingested. When they are not, grantees must manually report those tests in LACES.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

The grantee must ensure that learners are not admitted to classes without a valid, Educational Functioning Level-defining (EFL) assessment each new program year or period of participation for any subject area in which the learner will receive instruction.

* All initial pre-tests and any pre-tests administered after a gap in attendance of 90 or more days must begin with the locator or appraisal. Locator and appraisal scores are included in the automated ingests and may be manually reported in LACES. Grantees are not required to report locator and appraisal scores in LACES but are encouraged to do so.
* Pre-tests resulting in an EFL of “Completed ESL Level 6” are not valid for class placement. Grantees must ensure learners with this pre-test result are either tested in a different ESL subject area with a valid EFL for class placement or that they are re-tested on an ABE assessment for class placement.
* Grantees must ensure local processes are in place to allow for re-pre-testing for out of range scores during initial assessment and that consistent processes are in place for determining if and when learners will be re-pre-tested before being admitted to classes.
* Grantees may request out of range pre-test scores be approved to populate an EFL in LACES before admitting learners to classes if they do not plan to re-pre-test the learner. Grantees must contact the AEI Data Coordinator to request approval of out of range pre-test scores.
* Grantees may use eligible tests from prior years for EFL and class placement in new program years only if the test resulted in a valid EFL and was administered within 90 days from when the learner will begin classes in the new program year. If using prior year assessments for placement in new program years, grantees must push forward the assessment in LACES prior to enrolling the learner into classes in the new program year.
	+ Tests resulting in an unapproved out of range score or an EFL of “Completed ESL Level 6” are not eligible to be pushed forward into new program years.
	+ In limited circumstances where a learner’s test from a prior year falls outside of the 90-day window but where evidence exists that the prior year test EFL is still valid for class placement, grantees may request a test push forward override.
		- Grantees must contact the AEI Data Coordinator with a description of the evidence and the learner’s LACES student ID number to request a test push forward override.
	+ In circumstances where grantees forget to push forward eligible assessments into the new program year before 90 days have passed since the assessment was given, grantees may request a test push forward override.
		- Grantees must contact the AEI Data Coordinator with a description of the evidence and the learner’s LACES student ID number to request a test push forward override.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

The grantee must ensure that local procedures are in place for determining when a learner is post-test eligible based on the instructional hours in a corresponding subject area reported in the learner’s attendance in LACES and any other local criteria used to consistently determine post-test eligibility.

* Only instructional hours in a corresponding subject area which occur before the date of the learner’s post-test, and which occurred on or after the date of the learner’s last test of the same vendor/subject are counted toward post-test eligibility. This includes distance instructional hours and instruction – Assessment hours recorded in LACES. This does not include unlinked or workshop hours. Instructional hours attended on the same day as a post-test do not count toward eligibility on the post-test given that day and will instead count toward the learner’s next post-test.
* Grantees must complete an [Early Post-Test Form](http://www.cde.state.co.us/cdeadult/grantees/laces-data-dictionary/instructional-hour-exception-form) before early post-testing a learner who has attended fewer than the vendor’s minimum required hours for post-testing. The form must be signed and dated by the program director or their designee before learners are given any early post-test. The grantee must ensure all approved Early Post-Test forms are uploaded into LACES when a learner’s early post-test is entered into LACES.
* Early post-tests forms must not be used/completed retroactively where approval from the program director, or their designee, was not given using the form prior to the early post-test.
* Grantees must ensure local procedures are in place to avoid using the same assessment form back-to-back resulting in a same form post-test error.
* Grantees must ensure local procedures are in place to avoid overuse/over-testing on NRS assessments. These high-stakes, standardized assessments are designed to be used when learners and instructional staff have completed a course of study designed to result in an EFL gain. They must not be used to replace in-class assessment of learner progress. Grantees must also implement non-NRS formative and summative assessments into instruction to measure learner progress and should analyze these and other evidence of learner progress prior to post-testing using an NRS assessment.
	+ Assessment data will be monitored to track learners post-tested more than twice at the same level within a six-month period. Grantees must analyze this data for instructional and program improvements.
* Post-tests resulting in an EFL of “Completed ESL Level 6” are valid for attaining a Measurable Skills Gain (MSG) if the learner’s corresponding pre-test level was below “Completed ESL Level 6.” In order to continue attending classes in the same subject area after a post-test result of “Completed ESL Level 6” learners must be pre-tested on an assessment approved for tracking ABE EFLs.
* Grantees must ensure local processes are in place to allow for re-post-testing for out of range scores during post-testing and that consistent processes are in place for determining if and when learners will be re-post-tested before being continuing with classes.
* Grantees may request out of range post-test scores be approved to populate an EFL if the test was administered on the level indicated in the test vendor’s manual if they do not plan to re-post-test the learner. Grantees must contact the AEI Data Coordinator to request approval of out of range post-test scores.
* Grantees must ensure local processes are in place for sharing NRS assessment scores and results with instructional staff and that scores are used for instructional planning. Grantees are encouraged to discuss score results and instructional planning with learners to support them in goal setting.
* Grantees must analyze assessment administration and score data no less than quarterly for instructional and program improvements. The grantee must ensure that, no less than quarterly, LACES data is reviewed to determine whether the grant program is on track to meet or exceed post-testing and Measurable Skill Gain targets.
* For learners eligible to post-test who are not post-tested before separating from the program, grantees must add a comment in the learner record explaining why the eligible learner could not be post-tested before exiting. The grantee will analyze these comments no less than annually to design and implement support for learners and program improvements.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

For any tests triggering an early post-tests or same form post-test error flag in LACES, grantees must select an override reason in order to save the test record in LACES. (Please note this may include tests given for a new Fiscal Year or PoP, to address an out-of-range score, an incomplete testing session, or a test invalidated due to cheating or testing disruptions):

* Early post-test override reasons:
	+ Save early post-test error and add exception form
	+ Save early post-test error and add error comment
	+ Save re-test for a new fiscal year or PoP
	+ Save re-test for an out of range score
* Same form post-test override reasons:
	+ Save same form post-test error and add error comment
	+ Save re-test for a new fiscal year or PoP
	+ Save re-test for an out of range score

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

For assessment data entry errors requiring a test deletion, the grantee must ensure that an email request is sent to the AEI Data Coordinator to request a test deletion. Before requesting a test deletion, the grantee must ensure the corrected assessment record has been entered into LACES (if applicable). The email request must include:

* Student ID
* Test Name (including form, level and subject area)
* Test scale score
* Test administration date (as entered in LACES)
* A brief description of the data entry error
* Rationale for why the assessment needs to be deleted

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

If not using NRS assessments but using some other standardized assessment for the purposes of placement, academic/career planning, or documenting progress and outcomes, to the greatest extent possible, those assessment results must be entered into LACES no less than one week after assessment administration.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

### 4. Attendance & Hours Data Entry

The grantee must ensure all programming delivered with AELA allocation or program income funding are reported in LACES. The grantee will ensure that all classes, case management, and/or counseling reported in the grantee’s locations list are entered as individual class or workshop records in LACES with matching start and end dates, titles, program types, addresses, and times.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

Grantees may track other non-AEFLA or AEFLA match funded classes in LACES but are not encouraged to do so as the LACES database is intended for AEFLA and AELA grant reporting. These must be recorded as workshops in LACES.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

All classes and workshops reported in LACES must include a physical address in the “Location Detail” field that can be used to place the class location on a map.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

The grantee must ensure that attendance hours are tracked for all programming (classes, tutoring, and academic or career counseling/advising). LACES class records will be used to track all instruction aligned to the NRS assessments (TABE, CASAS Life and Work, CASAS Goals, and Best Plus 2.0). Grantees not administering NRS assessments will report all programming (classes, tutoring, and academic or career counseling/advising) as Workshop records in LACES.

All attendance hours, both for classes and workshops, including distance learning hours, must be entered into LACES no less than one week after the programming takes place. Hours must be entered at the daily level in no more than 15-minute increments. The only exception to this is if the grantee has been approved to report learner mastery model distance learning hours which must be reported in aggregate no less than every 89 days. Grantees reporting approved learner mastery model distance learning hours are encouraged to report that attendance data monthly.

**Initial: \_\_\_\_\_**

For classes, attendance hours must be tracked separately by each subject area. For workshops, attendance hours are not tracked by subject.

**Initial: \_\_\_\_\_**

The grantee must ensure that approval for distance learning hours is requested and received from the AEI Office before recording distance learning hours in LACES. For both workshops and classes, distance learning attendance must be tracked separate from in-person attendance.

* For workshops, distance hours types include “Workshop – Distance Learning” and “Workshop – Distance Learning - Async.” Distance learning that takes place live, via tele – or video-conferencing technology should be reported as “Workshop – Distance Learning” (if approved by AEI). Distance learning the learner engages in on their own, without an instructor present, should be reported as “Workshop – Distance Learning - Async.” (if approved by AEI).
* For classes, “Instruction - Distance Learning” and “Instruction - Distance Learning – Async.” hours types are available for all subject areas. Distance learning that takes place live, via tele – or video-conferencing technology should be reported as “Instruction – Distance Learning” (if approved by AEI). Distance learning the learner engages in on their own, without an instructor present, should be reported as “Instruction – Distance Learning - Async.” (if approved by AEI).

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

Synchronous attendance reporting, whether in person or via tele- or video conferencing technology may not exceed 8 hours in a single day.

**Initial: \_\_\_\_\_**

For classes, grantees must ensure that all classes reported LACES are entered as individual class records, meaning they should have discrete start and end dates that align to the grantee’s scheduled for managed enrollment. Class records with start and end dates that span the entire program year are not allowed and must be re-reported under discrete class records matching the grantee’s managed enrollment schedule. Class start and end dates will be monitored, and grantees must address any data reporting errors identified in their monitoring reports.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

For classes, grantees are strongly encouraged but not required to report “0” hours records for learners when they miss scheduled classes/hours so that attendance reports in LACES function correctly.

**Initial: \_\_\_\_\_**

**Not Applicable: \_\_\_\_\_**

For attendance data entered into LACES more than 2 weeks passed the date it is required to be reported, grantees must add a Late Data Entry comment in the learner or class record in LACES. The comment must indicate what data was entered late and any known cause for that late data entry. Grantees must analyze late data entry comments no less than annually to identify improvements to their local data collection and reporting procedures.

**Initial: \_\_\_\_\_**

The grantee must ensure that learners are exited/completed from classes and workshops in LACES within the timeframe identified in the grantee’s Attendance Policy’s and, at a minimum, no less than 2 weeks after the class/workshop ends. The grantee must also ensure all classes/workshops in LACES are completed no less than 2 weeks after the end date of the class.

**Initial: \_\_\_\_\_**

The grantee must review all attendance data for completeness and accuracy before entering the data into LACES, including but not limited to checking for existing attendance records before creating new records (to prevent duplicates) and confirming the accuracy the number of hours entered for each record.

**Initial: \_\_\_\_\_**

The grantee must ensure that, no less than quarterly, attendance data are reviewed to inform program and instructional design and delivery, including but not limited to increasing persistence and retention, improving intake/orientation and class schedules, improving instructional quality, and increasing supports to address learner barriers.

**Initial: \_\_\_\_\_**

5. Outcomes and Progress Measures Data Entry

The grantee must conduct goals setting around Progress Measures and Performance Outcomes with all learners. AEI Recommends this goal setting take place before placement into programming and that grantees revisit goals with learners no less than quarterly. Grantees must ensure a good faith effort is made to enter all Outcomes and Progress Measures goals data not associated with assessment and attendance data reporting into LACES on no less than a quarterly basis.

**Initial: \_\_\_\_\_**

The grantee must ensure that no less than quarterly, data are reviewed to inform program and instructional design and delivery, including but not limited to increasing persistence and retention, improving intake/orientation and class schedules, improving instructional quality, and increasing supports to address learner barriers.

**Initial: \_\_\_\_\_**

The grantee must ensure that no less than quarterly LACES data is reviewed to determine whether the grant program is on track to meet or exceed performance outcomes and progress measures goals. Reporting forms and deadlines will be established by the AEI Office. Data reported will be shared with the Adult Education and Literacy Workforce Development Committee meetings.

**Initial: \_\_\_\_\_**

Grantees must ensure that required documentation is reported correctly in LACES.

* All goal validation documentation for met goals requiring validation must be entered into LACES with the document type which corresponds to the goal name. AEI will review documentation monthly for approval.
* All tests administered with accommodations that require documentation from a medical professional must be recorded in LACES as either an “Accommodations Documentation” document or a “Testing Accommodations Comment.” Personal medical data may be redacted from these comments/documents but information about the accommodation approved and provided to the learner during the testing session must be included

**Initial: \_\_\_\_\_**

### 6. Staff Data & LACES User Permissions

* Grantees must ensure all staff working on the AELA program are reported in LACES. Staff records must include all required fields:
	+ Name
	+ Email
	+ Classification (job role)
	+ Employment status (full/part time)
	+ Credentials
	+ Start Date
	+ Years teaching in adult education
* Grantees must ensure that any certification or training documentation requested from AEI is added to staff documents in LACES.
* Grantees must ensure that staff records in LACES are created before requesting LACES user permissions for new staff.
	+ Grantees must email the AEI Data Coordinator to request LACES user permissions for new staff. Only the LACES System Administrator or Primary Contact may request LACES user permissions staff. The email must include the following:
		- First name
		- Last name
		- Email address
		- NOTE: AEI discourages the use of personal email addresses for use in creating LACES user accounts. AEI strongly recommends using work/employer-provided email addresses for user accounts in order to maximize security of learner data.
		- User role/permissions requested
* Grantees must request staff user permissions be disabled no less than 2 weeks after the staff person is no longer working on the program.
	+ Grantees must email the AEI Data Coordinator to request LACES user permissions be disabled for staff who have left the program. The email must include the staff member’s email address used as their LACES username.
* Grantees must update a staff member’s overall status in LACES to “Left” in LACES no less than 2 weeks after the staff person is no longer working on the program.

### 7. Data Privacy

Grantees must implement safeguards to protect the privacy of learner data collected in LACES. This includes but is not limited to:

* Not sharing users access (usernames and passwords)
* Logging out of LACES when not in use
* Training users on what data they are/are not permitted to access in LACES
* Using LACES user permission levels to determine what data users are/are not able to access in LACES

**Initial: \_\_\_\_\_**

Grantees must ensure all paper files containing learner personally identifiable information and other educational data are stored in a secure location. The grantee must also ensure that all digital files containing learner data are securely stored and protected.

**Initial: \_\_\_\_\_**

**Local LACES System Administrator Name (Printed)**

**Local LACES System Administrator Signature Date**

**Program Director Name (Printed)**

**Program Director Signature Date**