



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF CAREER, TECHNICAL, AND ADULT EDUCATION

**PROGRAM MEMORANDUM OCTAE 19-2**

**DATE:** August 15, 2019

**TO:** State Directors of Adult Education

**FROM:** Scott Stump /s/  
Assistant Secretary

**RE:** Allowable Use of Adult Education and Family Literacy Act Funds for Integrated Education and Training Programs – Frequently Asked Questions

**Purpose**

The purpose of this memorandum is to clarify the circumstances under which Adult Education and Family Literacy Act (AEFLA) funds may be used to pay for occupational certificates and/or credentials in an Integrated Education and Training (IET) program.

AEFLA defines IET as “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.”<sup>1</sup>

**1. May AEFLA funds be used to pay for certificates and/or credentials in an IET program?**

Yes. States and eligible providers may use AEFLA funds to pay for occupational certificates and/or credentials within an AEFLA-funded IET program, consistent with the requirements of the AEFLA program regulations at 34 C.F.R. §463.36. Generally, the certificates and credentials must be necessary to achieve the purposes of the IET program as described in 34 C.F.R. §§463.36-463.38.

**2. What types of occupational certificates and/or credentials are acceptable to achieve the purpose of an IET program?**

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<sup>1</sup> Section 203(11) of WIOA and 34 C.F.R. § 463.35. IET is further described in the regulations at 34 C.F.R. §§ 463.36-463.38.

There are generally two categories of occupational certificates and/or credentials that are acceptable to achieve the purpose of an IET program – a recognized postsecondary credential or other types of credentials, as described below.

First, occupational credentials meeting the definition of “recognized postsecondary credential,” defined in section 3(52) of WIOA to include a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, or a license recognized by the State or Federal government, are appropriate to achieve the purpose of an IET program.

A recognized postsecondary credential is awarded in recognition of an individual’s attainment of measurable technical, industry, or occupational skills necessary to obtain employment or to advance within an industry or occupation. These technical, industry, or occupational skills generally are based on standards developed or endorsed by employers or industry associations. Consistent with [OCTAE Program Memorandum 17-2](#),<sup>2</sup> recognized postsecondary credentials earned through an IET program may be counted towards credential attainment in the National Reporting System for Adult Education (NRS).

Second, other types of credentials or certificates may be appropriate to achieve the purpose of an IET program, if such certificates document the attainment of general skills that are required to qualify for entry-level employment or advancement in employment and are a part of a career pathway. These certificates may include skills related to safety, hygiene, and other general skills. As noted in Program Memorandum 17-2,<sup>3</sup> general skill certificates are not countable towards the credential attainment measure in the NRS.

### **3. What types of occupational certificates and/or credentials are not an allowable use of AEFLA funds for an IET program?**

AEFLA funds may not be used for the cost of certificates awarded by Local or State Workforce Development Boards or for work readiness certificates. These certificates are not consistent with the purposes of an IET program because integrated education and training (as defined in section 203(11) of WIOA and in the AEFLA program regulations at 34 C.F.R. §463.35), requires workforce training to be for a specific occupation or occupational cluster. Such certificates generally are not recognized industry-wide, do not document the measurable technical or industry/occupational skills necessary to gain employment or advancement within an occupation, and do not document the attainment of general skills that are required to qualify for entry-level employment or advancement in a specific occupational cluster.

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<sup>2</sup> [OCTAE Program Memorandum 17-2: Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Title I, Title II, Title III, and Title IV Core Programs, pp. 12-13. \(August 23, 2017\).](#)

<sup>3</sup>*Id.*

**4. What other requirements must States consider in approving costs associated with occupational certificates and/or credentials?**

As with all AEFLA program costs, States and eligible providers have the responsibility to ensure that all costs associated with any certificates or credentials funded by AEFLA as part of an IET program must be reasonable, necessary, and allocable consistent with the cost principles in subpart E of 2 C.F.R. part 200, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Additionally, using AEFLA funds to pay for credentials and certificates in an IET program may not supplant funds previously used to pay for such certificates and credentials (WIOA section 241(a)).

**Inquiries**

Questions concerning this program memorandum may be directed to Jay LeMaster ([john.lemaster@ed.gov](mailto:john.lemaster@ed.gov)) or your OCTAE Area Coordinator.