

Workforce Development Agency (WDA), State of Michigan
Office of Adult Education
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2016-17 SECTION 107, STATE SCHOOL AID ACT REQUIREMENTS

Following are critical requirements that apply to all State School Aid, Section 107 funded programs for 2016-17. Intermediate school district fiscal agents and regional providers should refer to the [WDA website](#) for additional information.

Section 107 of the 2016-17 State School Aid Act (Public Act 249 of 2016) allocates \$25 million for adult education programs. (\$24.5 million for regional adult education programs and up to \$500,000 for a career tech pilot program.)

Funds allocated under Section 107 are restricted for adult education programs as authorized under Section 107 only. A recipient of funds under Section 107 is prohibited from using these funds for any other purpose.

Funds will be allocated to only **ONE** intermediate school district (ISD) serving as the fiscal agent for adult education programs in each of the ten prosperity regions in Michigan, as determined and agreed upon by all ISDs within the region.

Regional providers must provide services within the geographic boundaries of the prosperity region, however, participants can obtain services from any region.

INTERMEDIATE SCHOOL DISTRICT (FISCAL AGENT) REQUIREMENTS

To be an eligible fiscal agent, an ISD must comply with the following:

- A. Distribute funds to adult education programs in a prosperity region as described in Section 107 of the State School Aid Act.
- B. Collaborate with the talent district career council, which is an advisory council of the workforce development boards located in the prosperity region to develop a regional strategy that aligns adult education programs and services into an efficient and effective delivery system for adult education learners, with special consideration for providing contextualized learning and career pathways and addressing barriers to education and employment.
- C. Collaborate with the talent district career council, which is an advisory council of the workforce development boards located in the prosperity region to create a local process and criteria that will identify eligible adult education providers to receive funds allocated under Section 107 based on location, demand for services, and cost to provide instructional services. All local processes, criteria, and provider determinations must be approved by WDA, Office of Adult Education before funds may be distributed to the fiscal agent.
- D. Provide oversight to its adult education providers throughout the program year to ensure compliance with Section 107 requirements. The fiscal agent determines how this oversight will be provided.
- E. Report adult education program and participant data and information in the following systems as prescribed by WDA, Office of Adult Education:
 - [Michigan Electronic Grants System \(MEGS+\)](#) (application for funding)
 - [Michigan Adult Education Reporting System \(MAERS\)](#) (participant data reporting)

While the ISD serving as the fiscal agent for the region is responsible for reporting, it is recommended that the fiscal agent require each regional provider to enter its local participant data into MAERS. This information will be available for each provider and it will also be rolled up to the fiscal agent level for the region.

- F. An ISD shall not use more than 5% of the total funds allocated to the prosperity region for administration costs for serving as the fiscal agent.

MICHIGAN PROSPERITY REGIONS

Below are the prosperity regions within Michigan:

#	Prosperity Region	Counties
1	Upper Peninsula Prosperity Alliance <ul style="list-style-type: none"> Western Upper Peninsula Central Upper Peninsula Eastern Upper Peninsula 	Alger, Baraga, Chippewa, Delta, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Luce, Mackinac, Marquette, Menominee, Ontonagon, Schoolcraft
2	Northwest Prosperity Region	Antrim, Benzie, Charlevoix, Emmet, Grand Traverse, Kalkaska, Leelanau, Manistee, Missaukee, Wexford
3	Northeast Prosperity Region	Alcona, Alpena, Cheboygan, Crawford, Iosco, Montmorency, Ogemaw, Oscoda, Otsego, Presque Isle, Roscommon
4	West Michigan Prosperity Alliance <ul style="list-style-type: none"> West Central West Michigan 	Allegan, Barry, Ionia, Kent, Lake, Mason, Mecosta, Montcalm, Muskegon, Newaygo, Oceana, Osceola, Ottawa
5	East Central Michigan Prosperity Region	Arenac, Bay, Clare, Gladwin, Gratiot, Isabella, Midland, Saginaw
6	East Michigan Prosperity Region	Genesee, Huron, Lapeer, Sanilac, Shiawassee, St. Clair, Tuscola
7	South Central Prosperity Region	Clinton, Eaton, Ingham
8	Southwest Prosperity Region	Berrien, Branch, Calhoun, Cass, Kalamazoo, St. Joseph, Van Buren
9	Southeast Michigan Prosperity Region	Hillsdale, Jackson, Lenawee, Livingston, Monroe, Washtenaw
10	Detroit Metro Prosperity Region	Macomb, Oakland, Wayne

FUNDING ALLOCATIONS AND DISBURSEMENTS

Funding allocations for each prosperity region were determined as follows:

For **2016-2017**, the Section 107 legislation froze the three-year census data phase-in plan for one more year. Therefore, for 2016-17, 67% of the allocation provided to each intermediate district serving as a fiscal agent is based upon the proportion of total funding formerly received by the adult education providers in that prosperity region in 2013-2014, and 33% of the allocation is based upon the census data factors indicated below.

Following are the most recent 5-year census data factors used to determine the allocation for each region.

NOTE: This is census data only and NOT participant eligibility criteria. Please refer the Participant Eligibility Criteria within this document.

- Sixty percent (60%) of this portion of the funding shall be distributed based upon the proportion of the state population of individuals between the ages of 18 and 24 that are not high school graduates that resides in each of the prosperity regions, as reported by the most recent 5-year estimates from the American Community Survey (ACS) from the United States Census Bureau.

- Thirty-five percent (35%) of this portion of the funding shall be distributed based upon the proportion of the population of individuals age 25 or older who are not high school graduates that resides in each of the prosperity regions, as reported by the most recent 5-year estimates from the American Community Survey (ACS) from the United States Census Bureau.
- Five percent (5%) of this portion of the funding shall be distributed based upon the proportion of the state population of individuals age 18 and older who lack basic English language proficiency that resides in each of the prosperity regions, as reported by the most recent 5-year estimates from the American Community Survey (ACS) from the United States Census Bureau.

Following are the Section 107 regional allocations for 2016-17:

Prosperity Region	(67%) Total Funds Earned in 2013-14	(33%) Census Data	2016-17 REGIONAL FUNDING (\$24.5M)
REGION 1	\$332,980	\$209,843	\$542,823
REGION 2	\$248,264	\$205,343	\$453,607
REGION 3	\$115,083	\$186,905	\$301,988
REGION 4	\$3,150,596	\$1,283,752	\$4,434,348
REGION 5	\$903,135	\$465,750	\$1,368,885
REGION 6	\$771,696	\$717,869	\$1,489,566
REGION 7	\$625,346	\$302,291	\$927,637
REGION 8	\$1,261,863	\$684,875	\$1,946,738
REGION 9	\$647,298	\$629,940	\$1,277,238
REGION 10	\$8,358,739	\$3,398,432	\$11,757,171
STATE TOTALS	\$16,415,000	\$8,085,000	\$24,500,000

ISDs will receive 1/11th payments disbursed from the Michigan Department of Education, State School Aid Office on the 20th of each month based upon the total regional allocation.

REQUEST FOR PROPOSAL (RFP) REQUIREMENTS

Fiscal agents for a prosperity region are required to conduct an RFP process, at a minimum, every three years. (2015-16, 2018-19, 2021-22, etc.) A fiscal agent may choose to conduct an RFP process more often based upon the need in the region.

Fiscal agents for a prosperity region are required to conduct an open RFP for adult education services to be provided within a region, utilizing the Section 107 Statewide Provider Selection Criteria (developed by WDA Office of Adult Education, with input from the Section 107 Transition Workgroup). Fiscal agents have the flexibility to establish a regional provider selection criteria rubric for weighting each criteria.

ELIGIBLE ADULT EDUCATION REGIONAL PROVIDERS

Eligible adult education providers include a local school district, an ISD, a consortium of local school districts, a consortium of ISDs, or a consortium of local school districts and ISDs that are identified as part of the local process and approved by WDA, Office of Adult Education.

SECTION 107 REGIONAL PROVIDER ALLOCATIONS/PAYMENTS

EACH YEAR, fiscal agents for the prosperity region are **REQUIRED** to utilize the Section 107 Statewide Allocation Criteria (developed by WDA Office of Adult Education, along with input from the Section 107 Transition Workgroup) to determine regional provider allocations. Fiscal agents have the flexibility to determine the weight of each criteria.

A funding recipient shall receive payments under Section 107 in accordance with ALL of the following, as outlined in the statewide allocation criteria and Section 107 of the State School Aid Act:

- Three year average of actual number of eligible adult education participants served. (Beginning in 2016-17, an individual must be enrolled and have received one or more hours of instruction. Registration and assessment are not defined as receiving instruction.)
- Census/Support Data
- Local Needs (participants/employers)
- Three year average of participant completion/achievement of adult education objectives by achieving one or more of the following:
 - Achievement of an educational gain as determined by the National Reporting System levels (Refer to the Office of Adult Education Assessment Policy)
 - Achievement of basic English proficiency
 - CASAS Attainment of highest scale scores in ALL modules:
 - Reading 236 and above
 - Listening 228 and above
 - Writing 261 and above (not currently an option in Michigan)
 - TABE CLAS-E: Attainment of highest scale scores in ALL modules:
 - Reading 589 and above
 - Listening 608 and above
 - Writing 613 and above
 - Speaking: 595 and above
 - Attainment of a high school equivalency certificate or passage of one or more individual high school equivalency test
 - Attainment of a high school diploma or passage of a course required to attain a high school diploma.
 - Enrollment in a postsecondary institution
 - Entry into or retention of employment
- Three year average of participant completion/achievement of core indicators as identified in the Workforce Innovation and Opportunity Act (WIOA)
- Pre/Post-Test Rate
- Allowable Expenditures
- Deferred Funds

PARTICIPANT ELIGIBILITY CRITERIA

To be eligible to be a participant funded under Section 107, an individual shall be enrolled in an adult basic education program, an adult secondary education program, a high school equivalency test preparation program, or a high school completion program, that meets the requirements of Section 107, and for which instruction is provided, and shall meet either of the following:

- (A) Has attained 20 years of age.
- (B) Has attained 18 years of age and the individual's graduating class has graduated.
(July 1 after the individual's 18th birthday)

A region shall not be reimbursed under Section 107 for an individual who is an inmate in a state correctional facility.

A person who is not eligible to be a participant funded under Section 107 may receive adult education services upon the payment of tuition. In addition, a person who is not eligible to be served in a program under Section 107 due to the program limitations may continue to receive adult education services in that program upon the payment of tuition. The tuition level shall be determined by the local or intermediate district conducting the program.

ELIGIBLE PROGRAMS OF ENROLLMENT

To be eligible to be a participant funded under Section 107, a person must be enrolled and receiving instruction in an eligible adult education program of enrollment, as follows:

- **Adult Basic Education (ABE):** Instruction in language arts and/or mathematics provided to adults who function below 9th grade level (0–8.9) in reading or mathematics, or both.
- **Adult Secondary Education (ASE):** Instruction in language arts and/or mathematics provided to adults who function at or above 9th grade level but below 12th grade level in reading or mathematics, or both.
- **English as a Second Language (ESL):** Instruction in English language communication skills (comprehension, speaking, reading and writing) provided to students whose native language is not English. ESL may also include instruction in citizenship to prepare for naturalization.
- **High School Equivalency Test Preparation (HSE):** Instruction designed to prepare students to pass a WDA, Office of Adult Education approved test of high school equivalency.
- **High School Completion (HSC):** Instruction is designed to fulfill the requirements for a high school diploma.

An adult basic education program, an adult secondary education program or an adult English as a second language program operated on a year-round or school year basis may be funded under Section 107, subject to all of the following:

- a. The program enrolls eligible adults who are determined by a department-approved assessment, to be below ninth grade level in reading or mathematics, or both, for ABE; or between ninth and twelfth grade level in reading or mathematics, or both, for ASE; or who lack basic English proficiency for ESL.
- b. The program tests individuals for eligibility before enrollment and upon completion of the program in compliance with the state-approved assessment policy.
- c. A participant in an adult basic education program is eligible for reimbursement until one of the following occurs:
 - (i) The participant's reading and mathematics proficiency are assessed at or above the ninth grade level.
 - (ii) The participant fails to show progress on two successive assessments after having completed at least 450 hours of instruction.
- d. A participant in an adult secondary education program is eligible for reimbursement until one of the following occurs:
 - (i) The participant's reading and mathematics proficiency are assessed above the twelfth grade level.

- (ii) The participant fails to show progress on two successive assessments after having completed at least 450 hours of instruction.
- e. A funding recipient enrolling a participant in an English as a second language program is eligible for funding until the participant meets one of the following:
 - (i) The participant is assessed as having attained basic English proficiency as determined by a department-approved assessment.
 - (ii) The participant fails to show progress on two successive department-approved assessments after having completed at least 450 hours of instruction.

A high school equivalency test preparation program operated on a year-round or school year basis may be funded under Section 107, subject to all of the following:

- a. The program enrolls adults who do not have a high school diploma or a high school equivalency certificate.
- b. The program shall administer a pre-test approved by the department before enrolling an individual to determine the individual's literacy levels, shall administer a high school equivalency practice test to determine the individual's potential for success on the high school equivalency test, and shall administer a post-test upon completion of the program in compliance with the state-approved assessment policy.
- c. A funding recipient shall receive funding for a participant, and a participant may be enrolled in the program until one of the following occurs:
 - (i) The participant achieves a high school equivalency certificate.
 - (ii) The participant fails to show progress on two successive department-approved assessments used to determine readiness to take the high school equivalency test after having completed at least 450 hours of instruction.

A high school completion program operated on a year-round or school year basis may be funded under Section 107, subject to all of the following:

- a. The program enrolls adults who do not have a high school diploma.
- b. The program tests participants before enrollment and upon completion of the program in compliance with the state-approved assessment policy.
- c. A funding recipient shall receive funding for a participant in a high school completion course until one of the following occurs:
 - (i) The participant passes the course and earns a high school diploma.
 - (ii) The participant fails to earn credit in two successive semesters or terms in which the participant is enrolled after having completed at least 900 hours of instruction.

CAREER AND TECHNICAL EDUCATION COURSEWORK COSTS:

A funding recipient shall agree to pay to a **career and technical education program under section 61a** the amount of funding received under this section in the proportion of career and technical education coursework used to satisfy adult basic education programming, as billed to the funding recipient by programs operating under section 61a.

TEACHER CERTIFICATION

An eligible adult education provider must employ certificated teachers for all programs of enrollment (ABE, ASE, ESL, HSE, HSC) and qualified administrative staff, and shall offer continuing education opportunities for teachers to allow them to maintain certification.

Refer to the WDA Office of Adult Education [Teacher Certification Policy](#) for detailed information.

ASSESSMENT

- Refer to the WDA Office of Adult Education [Assessment Policy](#) for detailed information.
- WDA approved assessments: TABE 9/10 (survey or full battery), TABE CLAS-E and CASAS.
- Adult education providers are required to assess and place ALL adult education participants into an educational functioning level (EFL) at intake (pre-test), and at the end of the instructional period or program year (post-test) using the same Office of Adult Education approved assessment to determine educational gain as defined by the National Reporting System.
- Adult education providers are required to enter the all pre-test and post-test scale assessment scores into MAERS for which instruction is being provided during each program of a participant's registration. These scale scores automatically place an individual on an educational functioning level and determines educational gain.
- Educational gain (movement from one EFL level to a higher EFL level) will be calculated based upon the lowest pre-test score in a content area to the post-test score within the same content area.

HIGH SCHOOL EQUIVALENCY TESTS AND CERTIFICATES

- WDA shall approve at least three high school equivalency tests to determine whether a high school equivalency certificate meets the requisite standards for high school equivalency in Michigan.
- The current sole source provider agreement between GED® and the State of Michigan expires December 30, 2016.
- Regional fiscal agents and providers will be notified of the approved tests and the effective date.
- Regional fiscal agents will determine the appropriate test(s) for the region.

ADULT LEARNING PLAN

- The Adult Learning Plan will be updated for 2016-17 based upon WIOA final rules and Section 107 changes. Fiscal agent and regional providers will be notified once the updated version becomes available.
- Refer to the WDA Office of Adult Education [Adult Learning Plan \(ALP\) Policy](#) for the forms and the technical assistance paper, which provides detailed information.
- All recipients of federal and state adult education funding are required to maintain the ALP for all adult education participants. The ALP is designed to gather required information that is helpful in enhancing the academic and economic success of the adult participant.
- The ALP is to be completed by a program-designated staff member (i.e., teacher, counselor) working with the participant. It is highly recommended that the ALP be a working document initiated during the intake process. It is an integral, but not all-inclusive part of the participant registration process.
- Information on the ALP must match the data entered into MAERS, for which support documentation is on file.
- The ALP is initiated upon intake and utilized for the entire duration of the participant's adult education services across program years.
- Complete an ALP ADDENDUM - CONTINUED REGISTRATION for each additional program year of the participant's registration period and attach to the initial ALP that was completed. All information should be completed as applicable for the specific program year identified. Data items with an asterisk (*) are optional.

- The following ALP Addendum pages are optional. These pages are designed to obtain a better understanding of the participant and assist in developing a plan of action for addressing barriers.
 - Barriers to Success
 - Educational Inventory, Personal Characteristics and Abilities, and Career Interests
- An agency cannot change the current format/structure of the required fields and responses. Additional information that individual program providers wish to obtain could be added to the available space on the ALP, or attached as a separate page.
- There is a technical assistance paper available which provides the practitioner with the information needed to complete the ALP.

GOAL SETTING POLICY

- Refer to the WDA Office of Adult Education [Goal Setting Policy](#) for detailed information.
- Goals should be selected that are appropriate to the educational level of the participant at program entry. This policy aligns goal selection with the Office of Adult Education's Assessment Policy, which requires local programs to provide educational services to the participant as determined by their assessment test at program entry.
- Goals should align with the participant's program of enrollment.
- Goal selection is a collaborative process between the participant and local program staff. Participants need to select their own primary and secondary goals, however, they also need the expertise, guidance, and counseling of local program staff. Local program staff must work with participants and provide goal counseling throughout the participant's entire registration period to ensure that goals selected are achievable.
- Local program staff must ensure that the educational services needed to achieve participant goals are provided.
- Goal selection does not impact federal or state performance measures or follow-up requirements.

TUITION AND FEES

A funding recipient receiving funds under Section 107 may establish a sliding scale of tuition rates based upon a participant's family income. A funding recipient may charge a participant tuition to receive adult education services under Section 107 from that sliding scale of tuition rates on a uniform basis. The amount of tuition charged per participant shall not exceed the actual operating cost per participant minus any funds received under Section 107 per participant. A funding recipient may not charge a participant tuition under this section if the participant's income is at or below 200% of the federal poverty guidelines published by the United States Department of Health and Human Services. NOTE: The 2014 U.S. Department of Health & Human Services Poverty Guidelines can be found at: <http://aspe.hhs.gov/poverty/14poverty.cfm>

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) PERFORMANCE (federal adult education funding)

While Section 107 funded adult education programs must meet Section 107 performance measures, these programs must also adhere to the performance measures under WIOA [Sec. 116(b)(2)].

WIOA establishes common performance accountability measures across the core programs. These measures are applicable to federal and state funded programs and must be reported in the Michigan Adult Education Reporting System (MAERS). At the end of the program year, WDA will review the grantee’s performance based on participant progress and the effectiveness of the program to achieve continuous improvement in order to optimize the return on investment of federal and state funds for adult education and family literacy activities.

The **primary indicators of performance** (effective on July 1, 2016) for activities provided under WIOA, including for the adult and dislocated worker programs, adult education and family literacy activities, employment services programs under Wagner-Peyser, and vocational rehabilitation programs are:

- I. the percentage of program participants in unsubsidized employment in the 2nd quarter after exit;
- II. the percentage of program participants in unsubsidized employment in the 4th quarter after exit;
- III. median earnings of program participants who are employed during the 2nd quarter after exit;
- IV. the percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent (subject to clause (iii))* during participation in or within 1 year after exit;
- V. the percentage of program participants achieving measurable skill gains; and
- VI. effectiveness in serving employers.

*Clause (iii) states that program participants who obtain a secondary school diploma or its recognized equivalent shall be included in the percentage counted as meeting the criterion only if, in addition to obtaining diploma or equivalent, they have obtained or retained employment or are in an education or training program leading to a postsecondary credential within 1 year after exit from the program. (Sec. 116(b)(2)(iii))

For PYs 2016-17 and 2017-18, USDOE will only negotiate and hold states accountable for one indicator for the AEFLA program – **(V.) measurable skill gain indicator**. Local programs must collect and report data into MAERS on all six measures. The data will be used to establish baselines for the other five indicators during this period. “Baseline” indicators will not be used in the end of year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions.

NOTE: Final regulations from USDOE/U.S. Department of Labor are expected in June 2016 and may impact this application. Any resulting changes will be amended appropriately and will be posted on the WDA website. Final regulations are expected to contain a definition and metrics for Effectiveness in Serving Employers.

The 2016-2017 USDOE negotiated target levels of performance for Michigan are as follows:

Measurable Skill Gain Measures for Michigan	
Performance Measures	2016-2017 Target
Adult Basic Education (ABE/ASE)	33%
English as a Second Language (ESL)	51%
Overall Measurable Skill Gain	41%

REPORTING REQUIREMENTS

Michigan Student Data System (MSDS)

Beginning 2016-17 (July 1-June 30), Section 107 funding will no longer utilize the count date/FTE process and reporting requirements.

Michigan Adult Education Reporting System (MAERS)

The data entry requirement is part of a comprehensive performance accountability system. WDA requires that all federal and state funded adult education and family literacy programs must enter data into MAERS for every adult education participant that registers for services and attends one or more instructional hours.

MAERS was developed to meet the USDOE data requirements specified in the NRS Implementation Guidelines. WDA must complete and file a report with USDOE every year using MAERS data to fulfill NRS reporting requirements.

Per USDOE requirements, data MUST be entered into MAERS monthly, at a minimum, and no later than the last day of the subsequent month. This includes Class Functions, Registration, daily attendance hours for every participant enrolled in an adult education class, Assessments (pre- and post-tests), Class Enrollment(s), Program Exits, and Follow-Up data. Programs must ensure that the data entered into MAERS is accurate and complete.

All PY 2016-17 participant data, including outcome and achievement data, MUST be entered into MAERS by July 31, 2017.

Additional information regarding MAERS is available in the [MAERS section](#) of the Office of Adult Education website. The [official MAERS website](#) for entering and retrieving data requires prior authorization with an assigned username and password that can be obtained by contacting the Office of Adult Education.

End of Year Reporting

Fiscal agents and regional providers are required to report on achievement of specified performance objectives, final expenditures and program information.

Performance Reporting: The WDA Office of Education will provide instructions in regards to the completion and submission of the performance report.

Final Expenditures:

- ▶ All Section 107 ISD fiscal agents and regional providers are required to report final expenditure information per WDA Office of Adult Education instructions/format:
 - ISD Fiscal Agent: Due July 21, 2017
 - Regional Providers: Due August 25, 2017

- ▶ All Section 107 ISD fiscal agents and regional providers are required to report revenue and detailed expenditure information in the Financial Information Database (FID), utilizing the appropriate codes for revenue and expenditures as follows:
 - Financial Information Database (FID)
 - Center for Educational Performance and Information
 - Deadline: November 1, 2017
 - Section 107 Revenue: Suffix Code 0030
 - ISD Fiscal Agent: Major Class Code 312
 - Regional Provider: Major Class Code 317
 - Tuition and Fees: Major Class Code 131
 - Section 107 Expenditures: State Code 331

AUDITS/REVIEWS

A funding recipient shall provide to the Office of Adult Education all information needed to administer the program and meet federal reporting requirements; shall allow the Office of Adult Education or its designee to review all records related to the program for which it receives funds; and shall reimburse the state for all disallowances found in the review, as determined by the Office of Adult Education.

RESOURCES

- On June 27, 2016, the Governor signed Senate Bill 801, 2016 State School Aid Appropriations, which was enacted into law as P.A. 249 of 2016. Go to the [Michigan Legislature website](#) for an analysis of the bill or to view the Public Act in its entirety.
- 2016-17 Section 107 Requirements
- [Adult Education Policies](#)
- Adult Education Participant Accounting Manual (updated version will be available soon)
- Census data (recent 5-year)
- ISDs and regional provider budgets by prosperity region (spreadsheet provided by Sandy)
- Three-year allocation plan (2016-17, 2017-18, 2018-19)
- [Prosperity Regions Map](#)
- Timetable – Deadlines and Important Dates
- [Workforce Development Agency Website](#)
- **OFFICE OF ADULT EDUCATION CONTACT:**

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