

**Comments on U.S. Department of Education
Strategic Plan for 2011-2014**

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To: strategicplancomments@ed.gov

To Whom It May Concern:

The Council for Advancement of Adult Literacy appreciates the opportunity to comment on the Department of Education's Strategic Plan for Fiscal Years 2011-2014. On the whole, we think this is an excellent framework document with a compelling vision. Our general and specific comments and suggestions come from CAAL's entire professional staff. They have mostly to do with adult and workforce education and our hope that the Department's intent and commitment can be made more evident through more explicit language in a number of places. I hope our input will be helpful.

GENERAL COMMENTS:

Overall, there is too little explicit mention in the draft of adult education or treatment of adult education in its own right (adult education is not mentioned at all in Sec. Duncan's Message). Likewise, there is too little explicit mention of ESL and correctional populations, or of cooperation with DOL and other departments with shared goals. We saw no references encouraging the essential business role in planning and program development. The central importance of technology and distance learning for the purpose of *expanding* outreach and access for adult students and achieving economies of scale needs explicit recognition, and the term "distance learning" needs to be included (it is not now mentioned at all now).

By combining Adult Education and CTE with Higher Education, it isn't clear that or even if ED has the goal of creating an adult education and workforce development system (as proposed in the Adult Education and Economic Growth Act and by the National Commission on Adult Literacy) and how it plans to do this. The plan would be stronger with regard to the 93 million cited if creating this system were a separate section in its own right within Goal 1.

Regardless of whether the Plan breaks out AE/CTE as a separate system, we believe that explicit language is needed to make it clearer what the Department's goals are regarding WIA reauthorization.

Improving the quality of the teaching force for AE/CTE is as important as for K-12, and we think this needs to be stated where appropriate.

The Plan gives very little recognition to the need to upgrade service for the nation's 10-20 million LEP adults. This could be fixed by incorporating the need into all aspects of Goal 4. The Plan recognizes the need to help immigrant professionals improve their English skills, but they are a small part of our adult ESL problem. The greatest ESL (equity) problem we face is expanding the quantity and quality of service for the vast majority of LEP adults who are not professionals but must rely on the public adult ESL system. In addition, ESL instruction should in some way be linked to initiatives to address the professional censure problem.

On page 55, the Plan's technology discussion should make it clearer that using technology (and distance learning) for adult education and CTE is an important goal, and how ED will pursue this goal. In this draft, AE/CTE isn't mentioned at all in the technology section. Technology and distance learning are one of the most widely recognized means of reaching the 93 million.

An erroneous assumption underlies some of the certificate language (i.e., that certificates are awarded only by accredited academic institutions. Relatedly, it is unclear in the mention of "certificates" (p. 18) whether the Plan means career readiness certificates, or certificates issued by postsecondary agencies usually for completion of a one-year program.

The plan misses a great opportunity (pp. 25-26) to explicitly include family literacy into its community approaches (Sec. Duncan mentions family literacy in his introduction).

SOME SPECIFIC LANGUAGE SUGGESTIONS --

There are many opportunities throughout the draft for enhancing the language on adult and workforce education and related matters. Following are some specific suggestions for your consideration:

Page 2, second paragraph: change "graduate high school" to "complete secondary education," in order to include adult students.

Page 6, the chart: The chart shows the outcome goal for adult education to be "obtaining a high school credential." It should continue with "...and transitioned into postsecondary education and/or workforce training".

Page 9, Sub-Goal 1.2: change to "Increase degree and certificate completion, job readiness, and job placement in high need areas..."

Page 11, para 3: change to "...ensure that all students are well prepared for college, employment, and careers..."

Page 12, in Indicators of Success, add two indicators: "Number of students transitioning to postsecondary or workforce training programs from adult education programs" and "The number completing such programs".

Page 12, Indicators of Success: add a fifth bullet - "Increase in Adult Secondary Education and job readiness certificates."

Page 13, Sub-Goal 1.1, Access: change to "...access to college, workforce education, and workforce training..."

Page 13, Sub-Goal 1.1, Actions/Means: change bullet 5 to "Build capacity to link postsecondary institutions more closely with elementary and secondary schools, adult education programs, businesses..."

Page 13, How will we get there?: bullet 4, add "...adult education programs...". (Note: This will provide a better match to bullet 4 on p. 14 regarding career pathways.

Page 13, How will we get there?: bullet 5, change to "be successful in jobs and careers."

Page 15, Bottom of first para: change to "...data systems for adult education and higher education.

Page 15, bottom of second para: change to "...foster better use of data in adult education and postsecondary education..."

Page 15, How do we get there? Add a fourth bullet: "For adult education, update and expand the National Reporting System to facilitate and capture data from state credentialing systems."

Page 17, Sub-Goal 1.3, Completion: This sub-goal has mostly to do with adult education. Add a missing item to Actions/Meanings that indicates a role for support service personnel to help adults navigate their way across a multi-agency environment.

Page 42, Sub-Goal 4.1. The 4th bullet should cite adult education programs as the path for underrepresented populations to reach their postsecondary and career goals. A similar citation is needed on p. 43 as a bullet in the list under "How Will We Get There."

Page 49, The Sub-Goal 5.2, Data Systems should explicitly mention adult education as having an important data system to be developed and more fully used. (But kudos for recognizing (p. 49, Sub-Goal 5.1, Data Systems) that data systems go beyond educational institutions and into the workforce.)

Page 55, Sub-Goal 5-4, Technology and Innovation. Adult education should be specifically mentioned as a sector with enormous potential for using technology and as deserving of investment.

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