

May 26, 2010

From:

Center for Law and Social Policy (Washington, DC)
Corporation for a Skilled Workforce (Ann Arbor, MI)
Council for Advancement of Adult Literacy/
National Commission on Adult Literacy (New York, NY)
Jobs for the Future (Boston, MA)
National Skills Coalition (Washington, DC)

To:

Senate WIA Reauthorization Key Staff

Dear _____ :

We are pleased to provide further detail to support our letter of May 4th, related to WIA reauthorization, and hope that this will be responsive to your question.

You asked for some specific recommendations for the three priorities stated in our letter:

- (1) Giving adult education a stronger workforce and postsecondary emphasis, in a way that provides all participants access to better opportunities, including low-skilled adults and those who are both high school completers and noncompleters, limited English proficient, and current or potential workers;
- (2) Rethinking the purposes of Title II, as well as the state and local activities under that Title; and
- (3) Providing a mix of incentives and requirements for states to more closely align and connect Titles I and II programs.

While our organizations can agree upon the three above key priorities, achieving consensus on the details is somewhat more difficult. The below recommendations do not represent the entire agenda of each of our organizations, but a limited number of items upon which we could quickly agree. Therefore, individual organizations may weigh in separately on areas where we do not have consensus.

We know that you and your colleagues are aware of the provisions contained in the Adult Education and Economic Growth Act (S. 1468). While the AEEGA is a good beginning in trying to move us in the right direction, we believe it needs to be substantially strengthened and urge you and your colleagues to be bolder in your efforts to reauthorize and reform WIA. Without explicit reform-oriented provisions in WIA reauthorization, and substantial new funding to accompany these reforms, most states will react unevenly and with hesitation, particularly given reductions in state revenues for adult education.

Following are our specific suggestions:

USE OF FUNDS

All of our organizations would like to see current Title II funding focus much more strongly on postsecondary and workforce success. At the very least, any new federal funding for adult basic education/literacy/ESL should be used solely to support career and college success by developing pathways to postsecondary education and providing career-related services leading to family-supporting employment (states should be held harmless for current state grant levels for traditional services). Pathways and services—such as integrated or concurrent adult education/workforce programs that move adults along a continuum to pass the GED and to be ready for college, job training, and jobs—should be intended and designed for all students, particularly those at lower levels for whom transitional services have been traditionally neglected and underfunded. Further, it is essential that these services include guidance, counseling, and wraparound support services.

The law should explicitly allow adult education and literacy, family literacy, and English literacy services to be provided either before or concurrently with work or postsecondary education and training. The law should also recognize that program strategies can include, but are not limited to, approaches that integrate basic skills and postsecondary education and training content or which may dual or concurrently enroll students in basic skills and postsecondary education and training.

STATE PLANS AND PLANNING

We support comprehensive state planning that *requires* Title I and II groups to work more closely together, the participation of ALL stakeholder groups in the state that provide important adult education and workforce skills development services or that will be affected by them (including business), and funding and incentives to encourage participation in the planning process. While we hope comprehensive planning will move the systems closer together, it does not supersede our recommendations to require states and providers to adopt policies that change practice.

- States should be required to develop unified, comprehensive statewide plans that detail how workforce and literacy services will be provided and reflect the presence of all state "stakeholders" at the planning table: WIA Title I and II; Temporary Assistance for Needy Families (TANF); corrections education; public vocational education; higher-education, particularly community colleges; elementary and secondary education; business; labor; and the governor's office. These plans should clearly show the connections between adult education and workforce development service providers, and between those providers and WIBs, One-Stops, higher education institutions, and other entities as appropriate. The plans should be linked to state economic goals and reflect employer/labor market demand. Federal legislation should explicitly articulate state performance measures as related to the desired new service goals and to demonstrate achievement. And states should be required to make explicit in their plans the certification tools they will use to validate teacher qualifications and student learning, as well as their commitment and strategies for moving "under-skilled"

adult learners (both high school completers and noncompleters) along a continuum to college and job readiness.

- Specific language should be included that makes it clear to states and local programs that traditional adult education programs can serve *all* categories of learners in need of adult education and workforce skills services (defined as age 16 and older, including both high school graduates and noncompleters).
- States should be required to describe how they will recruit and serve very low-level adult learners, including both high school completers and noncompleters. It is essential that states conduct outreach to populations that are often unlikely to seek out adult education without strong encouragement. Very low-level learners should be defined as those below the median level of skills of students enrolled in ABE and ESL programs, determined by a methodology to be established by the Secretary of Education.

ALIGNING ADULT EDUCATION, WORKFORCE, AND POSTSECONDARY SERVICES

We hope comprehensive planning will lead to better coordination between Titles I and II, but other concrete steps are necessary, as well. Changes to performance measures should also encourage greater alignment.

- As part of the planning process, states should negotiate with the Secretaries of Labor and Education the percentage of eligible individuals to be co-enrolled in Title I and II. Current co-enrollment levels, which average less than one percent, are insufficient. States should be held accountable for reaching annually increasing co-enrollment targets.
- States should be required to ensure that a sufficient array of adult education programs are available, on a state or regional basis, that offer credentials with value in the local labor market to students who do not yet have a high school diploma or GED and who are unlikely to earn one in the short-term. Such options might include partnering with a community college or job training provider and may or may not include getting a GED in the process. Students, including those at lower-skill levels, need more options to connect more quickly to education and training that leads to better jobs.
- Language should be included in WIA that supports and enables states to deliver services by local partnerships of cross-system providers, including basic skills, workforce, and postsecondary education and training partners, as well as community-based organizations. Such partnerships can help ensure a strong continuum of services, integrated programs, and coordinated transitions available to all learners.

PERFORMANCE MEASURES

For the employment-related services required, the Secretaries should adopt common

performance measures in consultation with the states and the other stakeholders. To the extent possible, these should consist of benchmarks of progress toward achieving and retaining family-supporting employment. We support the adoption of meaningful common measures, but it is imperative to ensure that such measures work for low-skilled/low-literate populations, who have not been well-served previously. [Many of the performance measures set forth in the Adult Education and Economic Growth Act are worthy of inclusion.]

Having found little consensus around empirical interim measures, we urge you to incent states to engage in research that would provide a better understanding of which interim benchmarks most likely lead to participant success.

States should be held accountable, in terms of specific performance outcomes, through annual or bi-annual reports subject to review by the federal government. Joint planning between Titles I and II must lead to joint outcomes for which both are held responsible.

The National Reporting System. To complement the new outcome expectations and respond to population and program variations within states, the National Reporting System (NRS) should be reformed/refined so as to more accurately reflect achievements in adult education, workforce skills development, and readiness for college and jobs. In fact, developing a useful, relevant, and accurate NRS is another key to achieving and verifying the desired program goals. Moreover, student-earned credentials or certificates validating short-term goals are important to help motivate students to remain in programs that will actually move them toward readiness for college and jobs or job training, or that may in a shorter time actually qualify them for jobs that do not require college or further job training. Recognizing the importance of earning of certificates and credentials can be an important first step in the revision of the NRS.

Performance measures should encourage programs to prepare students for postsecondary and career success, acknowledging that for very low-skilled populations achievement of such goals will take longer and that learning will occur along a wide continuum of proficiency. Adult education should include measures that reflect progression for people at points along pathways to readiness for college and jobs or job training, completion of programs (including success in postsecondary education--such as completing the equivalent of one semester of occupational training or college-level math or English, or earning a credential with demonstrated value in the labor market), and placement and retention in family-supporting jobs.

The Department of Education should measure all core outcomes (educational gains, entered employment, retained employment, receipt of secondary school diploma or GED, and entered postsecondary education or training) for all Title II participants, instead of those who simply identify the outcome as a goal. This will establish a performance baseline and provide a better base to compare states with one another.

A federal assessment policy should be developed that facilitates learner transitions by allowing success on postsecondary and workforce skill assessments to demonstrate achievement of core basic skills competencies (e.g., allow COMPASS college-entrance assessment and Work Keys assessment as recognized assessments in NRS).

INNOVATION FUND

We understand the Senate is considering creating a new “Innovation Fund” as part of WIA reauthorization. Such a fund should support innovative approaches that result in greater collaboration between Titles I and II, such as I-BEST type approaches and career pathways, as well as encourage sustainable systemic changes. The Innovation Fund should be jointly administered by the Secretaries of Labor and Education, who should consult with other agencies as appropriate. In particular, we urge the Departments of Labor and Education to work with the Department of Health and Human Service to enhance the role of the TANF program in adult education and workforce development.

DEFINITIONS

Corresponding with the above recommendations, certain definitional changes are needed. The National Commission on Adult Literacy redefines “adult education and workforce skills” as: the basic skills of reading, writing, math, and English Language proficiency plus, for employability and further learning, the soft skills of knowing how to communicate, acquire information, think critically, solve problems, use technology, and work in teams. Moreover, programs governed by WIA must share a common set of definitions to ensure closer coordination across the titles—for example, for the following terms: career pathways, integrated education and training, and low-skilled adults.

DISTANCE LEARNING

This point does not relate specifically to the three areas of our earlier letter, but it is important to note that we cannot reach dramatically larger numbers of adult learners through traditional adult education and workforce development systems alone. Developing the capacity of distance learning to substantially expand the reach and content of services should be a very high priority. Both federal and state government should make substantial investments in the expanded use of technology to provide instruction and also to implement improved program management and performance reporting on a longitudinal basis.

We are pleased to provide this additional clarification. If you need further information, please let us know.

Cordially,