



National Coalition For Literacy

RECOMMENDATIONS

Adult Education and Economic Growth Act

TITLE I

Definition of career pathways (section 101). The Coalition supports the inclusion of its definition of career pathways, which was developed with input from a wide range of Member organizations.

"(3) Career and College Pathway Services: Career and College Pathway Services are defined as integrated adult education services and postsecondary education and training content or which dually or concurrently enroll students in adult education services and postsecondary education and training that lead to industry-based certification or institutionally-granted certification, diplomas, or degrees necessary for high demand jobs."

Pilot Projects (section 110). There are two pilot projects in section 110 of the bill (amending Section 171 of the Workforce Investment Act) which appear to have a high level of involvement for adult education (including ESL). Yet there is no involvement from the Office of Vocational and Adult Education or any other entity with knowledge as to what is required to operate an effective adult education program. We urge you to amend this section to call for joint review of applications by the Department of Labor and OVAE to ensure that the adult education component is of high quality and meets the requirements of programs funded under WIA Title II.

TITLE II

State Distribution of Funds; Matching Requirement (Section 206). The Coalition has addressed the needs of corrections by including in its WIA recommendations the removal of the 10 percent cap from current law. Your proposal would set a floor of 10 percent. It is the position of the coalition that states should have the flexibility to decide how much they will spend on corrections and on the adult education needs of other segments of the population seeking services. The Coalition has taken a position against any set asides which could diminish the ability of states to direct funding to meet the unique needs of their citizens.

State Leadership Activities. One of the items not included in your list of state leadership activities is “other activities of statewide significance that promote the purposes of this title.” We are opposed to the elimination of this item. This will limit the flexibility of states to address emerging issues and to address their own unique needs.

State Plan (Section 208). This provision would require states to describe the data system they will use to track over time student outcomes on the performance measures. At the present time, 15 states cannot do data matching. There is currently a problem following students for a year and we are not receiving a lot of useful data for states that cannot data match. If you are interested in a clearer picture of student outcomes over time, we suggest taking a sample of students, which should provide quality information about student outcomes.

Administrative Provisions (Section 212). This provision requires the Secretary of Education to consult with the Secretary of Labor prior to publishing proposed regulations in the Federal Register. There is no comparable language in Title I. If we are to work as a “system,” there should be reciprocity and the Secretary of the Department of Labor should also consult with the Secretary of Education prior to publishing proposed regulations in the Federal Register related to WIA.

National Institute for Adult Education, Literacy, and Workplace Skills (Section 213). Your bill proposes to modify (c)(1)(D) regarding the collection and dissemination of information. We would like to recommend that you insert the word “adult” between “advancing” and “education.” We are concerned that without the word “adult” that it could be once again interpreted that NIFL (or its successor) was to focus on cradle to grave literacy issues and not on adult education and literacy.

TITLE IV

Research in Adult Education (Section 401). This Title requires the establishment of a national research and development center for adult education, literacy and workplace skills within the National Center for Education Research. The Coalition is on record in support of a research center within the National Institute for Literacy (to be operated through a competitive grant). We do see a role for the Institute of Education Sciences in carrying out longitudinal research in the area of adult education, literacy, and workplace skills but believe the type of research center outlined in our proposal would better meet the needs of our constituency.

TITLE V

Credit for Employer Educational Assistance Programs (Section 501). We commend your inclusion of this Title in your bill and have one recommendation. We suggest amending Sec. 45R (a) to add at the end “in collaboration with programs funded under Title II of the Workforce Investment Act.”

CLARIFICATION NEEDED

Adult Education and Economic Growth Act

General Comment: There are numerous references to an adult education and workforce system. We would like to clarify whether the intention is to blend the two systems overall or for those students who are on an employment track. Our preference is for alignment of the two systems for those individuals with an employment goal. Title I is an employment program. Title II is an education program. The law should recognize the unique abilities of both systems and call for alignment when and where appropriate.

TITLE I

State Plan (Section 104): This provision calls for states to align their state plan under Title I with the state plan in Title II. We want to clarify that we are not talking about unified plans. Rather that the two would review each other's plans to see that they were aligned where appropriate to provide services such as career pathways but not a requirement for joint planning overall.

State Plan (Section 104): There is also a provision requiring states to describe the integrated education and training activities that will be integrated and aligned with workforce programs and services under Title I and the state's efforts to increase the number of participants concurrently enrolled in adult education under Title II and training and employment activities under Title I. We want a clarification that the intention is NOT to push for dual enrollment with adult education students to the point where these would be the only type of services offered through Title II. Rather we would like to see this type of integration promoted through Title I contracting with and paying Title II for such services.

State Plan (Section 104): There is also a provision requiring the Title I state plan to include a description of the common data collecting and reporting processes used for the programs and activities described in subsection A, including performance on the core indicators described in section 212 (adult education core indicators). We would like clarification of the intention of this provision. Is the intention to require Title II programs to report on Title I indicators? The adult education system does not have capacity to track increased earnings over time with a 5% administration cap. In addition, this would have the potential of further blurring the distinction between Title I and Title II programs.

Local Plan (Section 106): This provision amends Section 118 of current law (requiring local boards to submit a local plan to the Governor) to identify the integrated education and training activities carried out under Title I or Title II and the alignment of those activities. We want to know how you define “alignment” in this instance.

TITLE II

Definitions (Section 202). This provision modifies the definition of eligible provider to add “demonstrated effectiveness in workplace skills.” Many current Title II eligible providers will not be able to demonstrate effectiveness in workplace skills per se. The definition of workplace skills occurs in Title I but does not currently apply to most Title II programs. We would like a clarification of whether it is your intention that local program applicants in Title II programs be expected to demonstrate effectiveness in the provision of workplace skills.

Definitions (Section 202). This provision modifies the definition of family literacy services by inserting “the economic prospects for” after sustainable changes in... We are concerned that this language may change the purpose of family literacy programs from breaking cycles of illiteracy in families to preparing adults for employment. While family literacy programs like Even Start work to help participants reduce dependency on welfare, gain employment, etc., we are concerned this will make it the focus of the program. Would you please clarify the intention of this provision?

Reservation of Funds: Grants to Eligible Agencies; Allotments (Section 204). We would like a clarification of the provision adding Individuals who are Limited English Proficient with a high school diploma to the formula for distributing funds to the states. We are interested in the data that would be used to count this population. A question has also been raised about native English speakers who have a diploma but do not have skills. Are you considering the inclusion of a provision or hold harmless to prevent dramatic shifts in funding with the addition of this factor in the formula? We support serving this population but have questions on how it is to be implemented. We support this provision in principal.

Performance Accountability System (Section 205). This provision adds performance measures for attainment of work readiness, workforce skills and certificates that are nationally or industry recognized, etc. We are interested in whether every eligible provider would be required to measure them and whether or not there are acceptable measures that are valid and reliable.

Performance Accountability System (Section 205). This provision proposes to add a technology literacy indicator. Again, we are concerned as to whether there are available measures and whether they are acceptable, valid and reliable. If this is not the case, we would recommend placing them in the section of the law providing considerations for local funding applications.

State Leadership Activities (Section 207). We would like a clarification of the intention of a modification to (a)(1). We understand your reasons for eliminating references to phonemic awareness, systematic phonics, etc. but do not understand why you would remove the phrase “and instruction provided by volunteers or by personnel of a State or outlying areas.” We would oppose any efforts to eliminate references to volunteers and personnel of a state or outlying area.

State Leadership Activities (Section 207)(Item C). We are seeking a clarification to the changes to (C). This required provision would appear to modify (a)(5) of Section 233 of current law which calls for the monitoring and evaluation of the quality of, and the improvement in, adult education activities. The new provisions would substitute “to determine what works and to disseminate information about models and best practices.” We are concerned that these are two very distinct items and that the monitoring and evaluation of the quality of, and improvement in, adult education activities is important and should not be lost. In addition, while states can easily disseminate information, they may not have the capacity for determining “what works.”

State Leadership Activities (Section 207). Your bill proposes to divide state leadership activities into required and permissible activities. One of the required activities includes the provisions of technical assistance to “eligible providers.” We would like to clarify that your intention is to provide technical assistance to “all” eligible providers whether or not they are currently funded. If so, we have concerns that states do not have the funds to provide such unlimited technical assistance to all eligible providers and to carry out their other obligations under the law at the same time. The Coalition’s current proposal includes some required professional development activities but leaves other activities to the states, which are in a better position to determine the appropriate use of state leadership dollars. The Coalition opposes placing limitations on state flexibility.

State Leadership Activities (Section 207). One of the permissible state leadership activities includes “support for recruitment and outreach for instructors, students and employers.” We would like a greater understanding of the purpose of this provision.

State Plan (Section 208). One of the proposed state plan requirements is “a description of the knowledge and skills necessary for acceptance in postsecondary education and training.” We are not aware of a national standard or state standard for all postsecondary institutions. In addition, such standards could be quickly out of date since standards change from time to time. As such, this provision could place a heavy burden on the states and we have concerns that it cannot be carried out effectively. Could you please explain how you see states complying with this provision?