



Comments to the
Department of Health and Human Services
Administration for Children and Families
on the
New Interim Final TANF Regulations
August 28, 2006

On behalf of the Commission on Adult Basic Education, representing our nation's adult education practitioners, I would like to submit comments on 45 CFR Parts 261, et. al, the Interim Final Rule for the reauthorization of the Temporary Assistance to Needy Families program.

For many individuals on welfare, the path to self sufficiency begins with participation in adult education classes. For those with low levels of literacy, opportunities for job training and employment are often dependent on their ability to read and other academic skills. Adult education addresses this problem and helps individual obtain the education they need to obtain a job with a family-sustaining wage.

Based on our experience in the field of adult education, we would like to comment on several areas of the interim rule.

First, we support the Department's decision to retain the core requirement at 20 hours as the 30 hour total work activity requirement is put in place. This action provides an opportunity for persons with marginal skills both to work for 20 hours and receive Education Directly Related to Employment, etc. (a non core activity) for 10 hours weekly – thereby improving participants' chances of upgrading their positions and income. Based on our experience, those individuals who persist the longest and attend adult education classes on a regular basis are those who have access to child care and other support services. In our experience, parents without access to child care are often forced to put their education on hold, which can be detrimental to the family's overall well being. We encourage you to support child care support for work and instructional hours.

Second, in the section dealing with job skills training directly related to employment, we concur with the position that basic skills and language instruction can be components in this activity if the instruction is explicitly focused on skills needed for employment or combined in a "unified whole" with job training. We do, however, encourage you to allow components to be concurrent or consecutive as long as in combination they lead to employment.

Third, we agree with the contention in the section regarding Education Directly Related to Employment in the Case of a Recipient Who Has Not Received a High School Diploma or a Certificate of High School Equivalency that pursuit of a high school or high school equivalency diploma should be engaged in when it is a prerequisite for

employment or training. We are, however, concerned that Education Directly Related to Employment, etc. is restricted by statute to recipients who have not received a high school or high school equivalency diploma. Although many immigrants and refugees have a high school diploma when they enter the United States, to secure a well-paying job or participate in a training program, they will need English language instruction. This will also allow them to support the education of their children and ensure they do not become welfare recipients due to low levels of education.

We are also concerned that this section of the law does not recognize the need for additional education among those native born American citizens who may have graduated from high school but continue to have educational deficiencies which prevent them from securing a job which allows them to reduce or eliminate their dependency on government support programs. There is strong evidence to prove that many individuals who enter college need remedial classes before they continue their college education. The same is true for those individuals who are not college bound but who are seeking employment or participation in a job training program. We would encourage you to allow states the flexibility to include basic skills or English language instruction for clients who may have a high school diploma but continue to require educational services in order to enter a training program or secure a job.

Finally, with respect to the section of the rule dealing with study hours for distance learning, we request that in rural areas case supervision be done electronically and attendance be measured by time on task as recorded by computer. Many rural areas are remote from monitoring and instructional sites and the only option for education or training may be via computerized instruction. In these cases, on-site supervision is not possible.

We firmly believe one of the challenges to the adult education system is helping individuals become self-sufficient. We know from the recent National Assessment of Adult Literacy that individuals with lower literacy levels are disproportionately represented among the unemployed. Fifty-one percent of adults at the *Below Basic* prose literacy level were not in the labor force in 2003. Thirty-eight percent of adults with *basic* prose literacy were not in the labor force. **With such a strong correlation between literacy and employment, we believe adult education must be part of any successful effort to assist individuals to become working members of society and permanently eliminate their dependency on welfare.**

I appreciate the opportunity to comment on the Interim Final Rule. Should you have any questions regarding the positions taken in this document, please do not hesitate to contact me at 760-739-7307 or dgagliardi@euhsd.k12.ca.us.

Sincerely,

Dominick Gagliardi
President