

National Commission on Adult Literacy Views on Workforce Needs, AEEG Act. & WIA
(rev. October 17, 2009)

CONTEXT: Following release of *Reach Higher, America* in June 2008, the National Commission on Adult Literacy worked with Rep. Patrick Kennedy and others via the Council for Advancement of Adult Literacy (CAAL) to help develop the Adult Education and Economic Growth Act (AEEGA)¹. Among other materials developed to assist the process was CAAL's side-by-side (www.caalusa.org, Publications, 5/10/09) reflecting the Commission's specific recommendations for WIA. Commissioners Morton Bahr and David Beré provided testimony in 2009 to Rep. Hinojosa's Subcommittee on Higher Education, Lifelong Learning, and Competitiveness. Many Commission goals and proposals have been built into the AEEG Act, and the Commission has provided a strong letter of support to the AEEG sponsors. However, not all key Commission recommendations could be accommodated in the Act. *We hope that several of those elements, expressed as talking points below, can be incorporated as part of the WIA reauthorization or other legislative process.*

1. Explicit Language Should Provided in AEEGA TO Allow Use of Title II Funds For Services To Adults with High School Diplomas or Equivalencies. The AEEGA currently indicates that WIA Title II adult education programs may not serve high school graduates except those with limited English proficiency. This restriction would severely limit the role of adult education programs in working with low-skilled adults in general and it would undercut a main goal of AEEGA. These programs are the main providers of basic skills services and essential partners in a combined effort involving WIA I workforce skills groups. We urge that adult education programs in Title II be explicitly allowed to serve the full range of adults (the 88 million reported in *Reach Higher, America* as having one or more educational barriers that must be addressed to achieve readiness for college and jobs or job training) -- including high school graduates who have no college but need assistance in ESL or basic skills in order to qualify for college. Moreover, we suspect that Title I agencies are most likely to serve the unemployed, and we doubt that employers (via tax incentives) will serve the vast majority of employed people in need of basic skills services. We urge that WIA language state explicitly that integrated and sequential services that combine basic skills with job or college preparation is an allowable use of Title II funds and that Title II funds may be used for service to adults with high school diplomas or equivalencies.

2. Substituting the Term "Workforce" Where Workplace Appears in the AEEGA. Wherever the term "adult education, literacy, and workplace skills" appears, the proper word is "workforce." Other uses of "workplace" in the Act should likewise be changed to "workforce." The term "workplace" refers to people and activities at the work site. The term "workforce" refers to all adults who are current and potential workers. We believe the misuse of the term "workplace" to be a drafting error.

3. Hold Harmless and Funding Formula. Due to the recession, states are cutting back all aspects of education and funding. State finances are unlikely to recover for some years. Thus, many states will be unable to match *increased* levels of Title II funding. We believe that the matching requirement in Title II should be capped at the current state grant level. (Title I does not require any state match at all.) Our concern is to avoid inadvertently creating a disincentive to participate. *Importantly, we also propose that funds be allocated to the states based on the number of native English speakers without a high school diploma plus the number of individuals who do not speak English "very well."*

4. Conveying a strong sense of ambition and economic urgency. The Commission found that the adult education system as we know it fails to meet 21st Century needs. We think a key element of WIA should be an explicit statement about the need to increase service levels in the proposed new "adult education and workforce skills system," with its additional outcome goals -- from the current annual enrollment of 3 million (in DOL and ED adult education programs combined) to many times that number within a decade or so -- and to fund the new

¹ H.R.3238 (Rep. Patrick Kennedy, Ruben Hinojosa, et al); S1.1468 (Sen. Jim Webb, Sherrod Brown)

system to build the capacity. The reality of THAT need justifies the Commission's call for fundamental change in the way we do business and for a dramatic increase in funding levels.²

5. Proposed funding levels for WIA II programs. To achieve the service levels and other changes called for by the Commission is a big job. We think the funding level suggested in the AEEG Act for WIA II (\$850 million in 2010) does not reflect the magnitude of that job and urge an initial WIA II funding level of \$1.5 billion for adult education programs in 2010 and a clear statement in WIA that funds appropriated in subsequent years will be larger. Title I got \$4 billion over two years in the stimulus package, a \$2 billion near-term increase. Adult education, though it merits a \$1+ billion annual increase in the near term, did not receive any direct stimulus funding. Moreover, it is essential to realize that traditional adult education programs have the expertise for providing the traditional basic skills and they have much of the expertise for providing job training linked to adult education (as in VESL programs) and in postsecondary transition programs (also see point 7 below). If funding for WIA II does not parallel increased funding for WIA I, neither WIA I nor WIA II programs will be able to do their job fully or well.

6. State planning and leadership, and state coordination of services. *First:* The goals of the AEEG Act cannot be achieved unless WIA contains strong and specific requirements for “breaking down the silos” between and among Title I and Title II programs and all stakeholders in education and workforce development at national, state, and local levels (e.g., Title I, TANF, economic development agencies, community colleges, school districts, CBOs and voluntary groups, business, and organized labor). Thus, state-level leadership and planning is one of the most crucial ingredients of the entire AEEG Act. We urge that the reauthorized WIA mandate that all aspects of Title I and Title II state plans must be developed at the state level by a comprehensive and systematic planning process that includes all relevant stakeholders in a meaningful way, links adult education and workforce skills development, and sets the coordinated plan in a state economic development context. Ideally, the AEEG Act and WIA should specify the kinds of groups that need to be involved. *Second:* We also suggest that state plans should be required to identify what each stakeholder will do to provide support services and indicate how they will coordinate their activities on an ongoing basis, and that states should be required through specific language to report on their progress in coordinating services each year (one of the core indicators for which they will be held accountable). State plans should be required to include descriptions of how the states will develop program strategies to coordinate services—e.g., service to special populations; providing guidance, counseling, mentoring, and other supports; creating public-private partnerships; and creating transition strategies with such elements as dual enrollment, articulation of curricula, and high intensity instruction.

7. Interagency Coordination. These and other state planning requirements will need an extraordinary level of interagency coordination as well as coordination with the private sector. Thus, it is essential that states be allowed a one-year program development period before they must submit their initial plans (and that they then be held accountable for the plans' outcomes) under requirements of WIA, as set forth in the AEEG Act.

8. Developing Longitudinal Data Collection Systems. Explicit language needs to be provided requiring meaningful and comparable state-level data collection, so that we can measure the progress of the new adult education and workforce skills system. WIA should require the state plans to include multi-year plans for collecting data and tracking the progress of individuals across the programs provided by different public and private agencies, through new or expanded data collection systems that are nationally-anchored, probably to a redeveloped National Reporting System.

9. WIA I and II need explicit provisions for workplace education, incumbent workers, employer involvement, and employability. *Employer involvement* in Titles I and II adult programs has been recognized by the Commission and other national leaders as critical to expansion of adult education and workforce skills services and economic growth. State adult education programs need federal funding, research, and development support to plan, improve, and expand workplace education services. Workforce Investment Boards also need greater employer involvement in order to plan and provide better services, and businesses and state government

² It is worthy of note that WIA Title II enrollment of 2.3 million in 2008 compares to 2.2 million some 25 years ago in 1984.

need incentives to work more closely together. Incumbent worker education and training should be made an explicit priority for funding and development at national, state, and local levels in both WIA I and II and AEEGA should stipulate that Title I accountability measures, which in some instances parallel accountability measures in Title II, accord credit for attainment of credentials and degrees earned by incumbent workers. As now written in the AEEG Act, the new title on *Employer Incentives* would provide tax credits to employers to support basic skills and ESL services. The tax incentive initiative could be greatly strengthened by the addition of such services as workplace skills assessment, instruction, or certification. Dedicated workplace skills programs should be encouraged to develop partnerships, and to contract with experienced WIA-supported workplace education programs. Finally, one of the main purposes of the AEEG Act is to develop pathways and establish college and job readiness outcome goals. The Act's intent would be strengthened by more mention of "employability" and "pathways to family-sustaining jobs."

10. WIA Should Require, Rather Than "Allow" Certain Elements of the State Plan (to get new funds under AEEG)—see sections on state plans and performance accountability in the AEEG Act. The CAAL side-by-side work suggested 27 areas of attention for the state plan. Such a large number of items is not practical but we think that the AEEG Act requirements should be more explicit and detailed to assure the states realize they need to take the AEEG goals seriously, will be held accountable for them, and must plan comprehensively – as a precondition to obtaining any new funds. The heart of the whole future enterprise depends on what action the states take to reach more adults in more relevant and effective ways, and motivating the states to take that action.

11. Saving and Strengthening a Renamed National Institute for Literacy. The AEEGA preserves an independent NIFL, believing NIFL to be an essential (and unique) agency at a time when independent, cross-agency, adult-focused leadership is more urgently needed than ever. CAAL has developed a plan for NIFL's development which has been published in a recent paper distributed to members of Congress and others. It proposes to rebuild NIFL into a leadership organization that can meet both adult education and workforce skills needs, that is truly cross-agency in its outreach, that can be set up with a governance and structure to guarantee its flexibility and independence, and that has a 21st century agenda. (To avoid duplication, we think that ED's National Leadership Program should focus primarily on ED-related technical assistance required to implement Title II and closely related research.³) We doubt that the R&D function, which should overlap so many departmental, stakeholder, and topical interests, both within and outside of federal government, can be fully executed within the large and diverse corporate structure of the IES, which the AEEG Act requests. A more aggressive and crosscutting agenda can be carried out more effectively, and with closer attention to contextual differences, by the relatively independent interagency entity for which adult education and workforce development is the single high priority focus. Finally, we believe the National Institute for Literacy should be renamed to reflect its broader purposes, and suggest the National Institute for Adult Learning (NIFAL) -- producing an acronym that both captures "range" and has immediate recognition in "the field."

12. Sequential, Integrated, and Dual. The term "sequential" in WIA I needs to be handled carefully lest it be mistaken for the "sequence of service" provisions in current law that just about everyone wants to eliminate. But we think the AEEG's Title I definition of "integrated education and training" should be supplemented with brief mention of "sequential." References to "integrated education" are commonly taken to refer to the exemplary I-Best program, but there are other superb models, some of them sequential in nature, that may be more appropriate for low-skilled students who need some program elements offered one after another in more linear fashion. It is important for WIA to convey explicitly that adult education and workforce skills activities may occur either prior to or along with training or postsecondary education through both sequential and integrated programs. Program planning and accountability should reference both kinds of programs.

13. Clarifying the respective roles of WIA I and II. WIA I and II adult education programs have many legitimately different purposes and also share common purposes under the AEEG Act. It could be helpful if their respective roles are more clearly articulated. For example, if there is no way for One-Stops to show that they are investing in participants who are not job ready, assuming they are held to a quota of job placements, they will avoid enrolling Title II target populations and seek out the job ready. This would undercut a key AEEG Act goal.

³ ED also needs to conduct intra-agency activities among its multiple programs that can fund adult education, some 18 including OESE, FSA, OPE, OSERS, and OVAE, according to the Abt Directory of Federal Funding Sources for Adult Education (Feb. 2009).

We suggest that the legislation explicitly address the role of Title II funded agencies in preparing adults for college readiness, training, or employment, while communicating with the Title I One-Stops the availability of such students in order to fashion individual employment plans. It should also call for Title I One-Stops to work with Title II agencies so that Title II agencies can accept for instruction adults the One-Stops have identified as not being ready for college, training, or jobs.