



**NASDAE**  
National Association of State  
Directors of Adult Education

March 20, 2023

Hannah Jenuwine  
U.S. Department of Labor  
Employment and Training Administration  
Jenuwine.hannah.r@dol.gov

Reference: Notice of Request for information (FI) on Sector Strategies to MEET Critical Workforce needs Across Industries

Dear Ms. Jenuwine:

The National Association of State Directors of Adult Education (NASDAE, <http://nasdae.org>) appreciates the opportunity to submit comments to ETA on the Request for Information on Sector Strategies to Meet Critical Workforce Needs Across Industries. NASDAE represents adult education programs in the U.S. states and territories, authorized under Title II of the *Workforce Innovation and Opportunity Act* (WIOA).

Adult education is an investment in the social, racial, educational, and economic equity of the nation and its states and municipalities. Adults who participate are investing their time to learn academic and workforce skills, improve their English proficiency, and attain secondary and industry-recognized credentials. The programs funded under Title II of WIOA strive to help students overcome generations-long educational attainment and earnings gaps and to reduce the intergenerational impact of low educational attainment and facilitate the integration of immigrants into American society.

Title II is a key partner in the WIOA workforce development system in every state and territory. In Program Year (PY) 2021-2022, WIOA Title II served 899,692 participants, approximately forty-two percent (42%) of whom were employed while enrolled and thirty-four percent (34%) who indicated that they were unemployed and looking for work. By far, the largest segment of WIOA Title II participants, sixty-five percent (65%), are in their prime working ages, aged 25-54. WIOA Title II is a minority-serving system, serving seventy-eight percent (78%) non-White students and serving forty-nine percent (49%) of the enrolled learners in English language acquisition classes. The foreign-educated population served in WIOA Title II in PY 2021-2022 represented a broad continuum of educational attainment: 98,895 or twenty-two percent (22%) had completed a postsecondary degree or credential, twenty-one percent (21%) had completed a secondary credential, and 9,956 or two percent (2%) reported having had limited or no formal schooling. On self-reported barriers to employment, seven percent (7%) indicated that they were previously incarcerated, four percent (4%) indicated that they have a disability, and twenty-eight percent (28%) reported that they had a low income.

It is vital that decisions made about sector strategies in the public workforce development system take the strengths and needs of WIOA Title II participants and the programs that serve them into account in order to achieve development of the workforce. While information on the needs of English language learners, immigrants, and refugees is not specifically requested in this RFI, WIOA Title II services to these

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individuals provide critical value to workforce development and should be considered as a vital partner in designing sector strategies. Expanding labor force participation and improving job quality can only be accomplished with attention to this large and growing hard-working and diverse segment of our national population. There is a great need in every sector to support and incentivize employers to do more to recruit, train, manage, retain, credential, and advance workers for whom English is not their first language.

We encourage ETA and its partners to pay special attention to the power of sector strategies to make changes in communities about how frontline job opportunities are described and promoted. Many researchers and advocacy groups have noted that rewriting job and position descriptions to be more skills-based opens the door to a much larger recruitment pool. Similarly, working with employers to do more to make internal career pathways transparent to current and potential workers can yield benefits in recruitment, retention, and advancement.

WIOA Title II programs work diligently to prepare participants for future education, training, employment, and civic engagement. We reach populations that are not yet part of the public workforce development system and assist them to get connected in order to receive employment and career services. We strongly encourage ETA and its partners to ensure that the WIOA Title II partners in each state are **required** partners in sector strategy efforts.

Following are NASDAE responses to the questions posed in the RFI where WIOA Title II services are specifically relevant. For questions and additional information, you may contact me at [ptyler@nasdae.org](mailto:ptyler@nasdae.org).

Sincerely,



Patricia H. Tyler  
Executive Director



**NASDAE**  
National Association of State  
Directors of Adult Education

**NASDAE RESPONSE TO  
DOL ETA REQUEST FOR INFORMATION (RFI) ON SECTOR STRATEGIES  
TO MEET CRITICAL WORKFORCE NEEDS ACROSS INDUSTRIES**

**Topic Area 2: Partnership Roles and Requirements**

**2a.** WIOA Title II programs are vital partners with Sector Strategies, in order to address the statutory requirement to serve individuals with barriers to employment and in order to address the vision of developing skills and opportunities for historically marginalized populations and communities.

**2j.** Successful sector strategies can align with WIOA Title II programs in order to identify prospective employees from marginalized communities who have demonstrated the ability to persist successfully in a career pathways program geared to industry sectors. WIOA Title II partners can provide the industry-specific literacy, numeracy, and problem-solving syllabus designed to meet specific employer needs.

**2k.** The public workforce system can and should play a vital role in connecting the needs of individuals with barriers to employment to the needs of employers, with WIOA core partners strategizing to create sustainable programming.

**Topic Area 3: Promising Practices for Employer Engagement and Workforce Development**

**3d.** Promising sector strategies must provide a focus on job quality issues in order to end the exclusion of marginalized populations who depend on benefits and wrap-around supports in order to succeed in the workforce.

**3e.** WIOA Title II programs serve minority populations and can be critical to identifying prospective employees who have demonstrated skills and abilities to succeed in a career pathway designed around industry sectors.

**Topic Area 5: Resources**

**5a.** WIOA Title II programs are funded to provide Integrated Education and Training support. The populations served in these programs are typically underserved individuals who lacked prior educational support and opportunity.

**5b.** WIOA Title II funding is not sufficient to serve more than a small fraction of the individuals who could benefit from services.

**Topic Area 6: Federal Support for Sector Strategies**

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**6b.** Targeted funding to support specific sectors or specific populations in need of workforce development services, via sector grants available to consortia of WIOA core partners.

**Topic Area 7: Advancing Equity**

**7a.** Providing educational support (the industry-specific literacy, numeracy, and problem-solving syllabus designed to meet specific employer needs) can encourage employers to hire and retain historically marginalized and underrepresented populations such as women, people of color, individuals with disabilities, and others. These are populations served in WIOA Title II programs, which can provide the educational support.

**Topic Area 12: Necessary and Beneficial Technical Assistance Support**

**12b.** DOL could provide guidance for successful collaborations based on models of demonstrated effectiveness. Webinars that showcase successful collaborations initiated by WIOA core partners would be helpful. Specific guidance that focuses on the allowable funding uses and models of successfully braiding the funding streams would encourage more coordination at the state and local levels. Achieving the vision of WIOA and the advancement of sector strategies will rely on accessing the populations that have continued to be left behind. Adult education, as delivered under WIOA Title II, accesses these populations and must play a larger role in achieving the equity that is envisioned.