



NASDAE
National Association of State
Directors of Adult Education

April 9, 2021

Dear Senator Murray and Senator Burr:

The National Association of State Directors of Adult Education (NASDAE) is an organization created to provide support for the state leaders of the Workforce Innovation and Opportunity Act, Title II Adult Education and Family Literacy Act program. NASDAE offers professional development for member State Directors and serves to disseminate information and data on the need for adult education and the impact of the services.

NASDAE is pleased to offer the following comments in response to your request for input from stakeholders on the following policy issues for workforce development.

- *how to enhance or improve workforce training in direct relation to the COVID-19 pandemic and economic recovery, including ways to address workforce needs of the health care and public health sectors*

WIOA Title II adult education programs are designed to provide the educational support for workforce training. Over 22 million adults in the U.S. lack a high school diploma and are in dire need of skill remediation to earn this credential in order to qualify for employment or job-training.

Integrated Education and Training (IET), delivered by Title II programs, offers these adults the unique opportunity to streamline their job preparation through coursework and training that blends necessary contextualized academic skills with training for specific in-demand jobs.

Enhanced opportunities to provide IET would address the need for qualified workers where gaps exist, as these programs target employer needs. Increased funding for IET would benefit not only the health care industry, but the broader spectrum of needs for a qualified workforce.

- *reforms to programs authorized under the Workforce Innovation and Opportunity Act*

The primary purpose of WIOA is “To increase, for individuals in the United States, particularly those individuals with barriers to employment, access to and opportunities for the employment, education, training, and support services they need to succeed in the labor market.” The lack of basic academic, work readiness, and digital literacy skills constitutes a significant barrier to employment. Adult Education, as structured in WIOA, is in a unique position to address issues of low skill attainment that affect individuals and the economy, while straining healthcare and government-funded programs. Additionally, Adult Education is poised to be a key player in the U.S. post-COVID recovery; many of our nation’s workers who lost jobs will need to upskill or re-skill in order to return to self-sufficiency and

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typically the first place they will seek assistance is their local WIOA Title II Adult Education and Family Literacy Act (AEFLA) provider. Providers are able to offer the assistance with academic upgrades and training that will lead to jobs, especially focusing on the high demand areas of healthcare, construction, energy, and areas of local need for workers.

In order to strengthen the capacity of AEFLA programs to address the challenges of the long recovery period ahead, NASDAE has the following recommendations for the reauthorization of WIOA.

MEASURING THE IMPACT OF AEFLA IN PROMOTING PERSONAL AND ECONOMIC RECOVERY

The performance indicators put forth in Section 116 of WIOA do not fully measure the successes of participants in the Title II Adult Education and Family Literacy Act (AEFLA) Program. In fact, the performance measures do not seem consistent with the statutory purposes and activities.

1. Earning a high school diploma or its state recognized equivalent is a major step toward economic and personal success for adult education students and has long been a focus of AEFLA programs. A high school diploma is a requirement for many jobs, apprenticeship, and job-training programs. While this is not the terminal goal for the adult learner's educational experience, it marks the transition point from AEFLA to higher education, job training, or employment. Furthermore, the number of high school diplomas or equivalency credentials awarded is by far the most often requested piece of adult education data by legislators, workforce system and business partners, other stakeholders, and constituents. Yet, there is no unique performance measure for this critical accomplishment. High school credential awards are only counted toward performance goals if the awardee has met other goals, or may be considered as a skill gain *only* if other gains are not subsequent.

This is contrary to a stated purpose in Title II: assist adults in attaining a secondary school diploma. Additionally, it would be considered antithetical for any educational program or institution not to be able to measure performance on the completion of the level of education it is designed to provide.

2. There is increased focus for AEFLA providers to transition students to postsecondary education in WIOA, but there is no unique indicator for this. While adult education students attain the skills to earn a high school credential, they are also preparing for the next step in their educational/employment journey. Their experience is planned around their unique goals, most of which include further education or training at the postsecondary level. Yet there is no unique performance indicator for transition to postsecondary education.

Recommendations:

Section 116 (b)(2)(A)(i)(I): add, "or for Title II adult education participants, the percentage of program participants who are in education or training activities, or who are in unsubsidized employment during the second quarter after exit." (This would mirror performance measures for Title I Youth program participants where continued participation in education activities is desired.)

Section 116 (b)(2)(A)(i)(II): add, “or for Title II adult education participants, the percentage of program participants who are in education or training activities, or who are in unsubsidized employment during the fourth quarter after exit.” (This would mirror performance measures for Title I Youth program participants where continued participation in education activities is desired.)

Section 116(b)(2)(A)(i)(IV): remove the parenthetical “subject to clause iii.” Restate the clause to read: “the percentage of program participants who enter education or training that leads to a recognized postsecondary credential after exit from the program, or who obtain a recognized postsecondary credential or a secondary school diploma or its recognized equivalent during participation in or within a year after exit from the program.”

Section 116 (b)(2)(A)(iii): remove this clause.

CREATING PARITY IN THE ONE-STOP SYSTEM PARTNERSHIP

WIOA requires that AEFLA function as a partner in the one-stop system to include providing access to activities, using program funds to maintain the one-stop centers, entering into an agreement on the operation of the system, participating in the operation of the one-stop system, and providing representation on the State workforce development board. Yet, there is a visible and palpable lack of parity in the one-stop system.

1. Fewer than half the states include the State Director of Adult Education on the State workforce board. AEFLA, as a Core Program, should be represented on the boards by the individual who has the actual responsibility for the AEFLA program operation. Without representation on the state workforce board, Adult Education cannot fully participate as a contributing partner in the one-stop system.
2. One-stop operators in many instances incur high infrastructure costs. A line item in Title I for one-stop infrastructure costs would remove the financial barrier created by a requirement to fund these costs from the various program funding lines and place the responsibility on the state to fund the infrastructure. This would remove the time burden to negotiate local IFAs and allow the negotiations of MOUs to be more focused on relevant services; for Title II, it would free up limited resources (in comparison to other WIOA core programs) to address adult education student services.
3. Title I, Section 134 fundable training activities include adult education and literacy activities in combination with other training services, as occurs in Integrated Education and Training (IET), yet there are very few instances where the Section 134 funds support either the academic or the training portion of the IET programs implemented by AEFLA programs. Considering the substantial imbalance of funding between the one-stop system and AEFLA programs, it would be more beneficial to the system if the Section 134 funds would be encouraged to support the training components of the IET programs freeing AEFLA funds to pay for the academic components which are essential to the training and employment outcomes. Adult education

serves a unique and important role in the educational and workforce landscape of the United States. There is no other educational system through which adults can remediate their skills to enroll in postsecondary education or training or to obtain a workforce credential and to assist with their children's education.

Recommendations

Section 101(b)(3): Add language to require the individual with daily operation management responsibility for each of the Core Programs be a voting member of the State workforce development board, with no dual representation of Core Programs, required partners, or other partners.

Section 101 (e): Alternative Entity: remove this section as it allows entities to serve this role that do not meet the intent of the statutory requirements of the Boards laid out in the previous clauses of Section 101.

Section 121 (b)(1)(A)(ii): Delete this clause.

Section 121 (h): Rewrite this section to provide a statewide infrastructure funding line with allocation guidelines for the funding of local area one-stop infrastructure.

PROVIDING INTEGRATED ENGLISH LITERACY WITH WORKFORCE DEVELOPMENT

NASDAE strongly supports the goals of the Integrated English Literacy and Civics Education program to prepare adult English language learners for unsubsidized employment in the in-demand industries and occupations that lead to economic self-sufficiency, and to integrate with the local workforce development systems to carry out the activities of the program. We recommend the following change to strengthen the integration of these systems and to focus adult education services on the preparation of participants for the workforce.

Recommendations

Rename Section 243 "Integrated English Literacy with Workforce Development"

Section 243 (b): Rewrite to state, "for English literacy in combination with workforce preparation activities, workplace adult education and literacy activities, pre-apprenticeship programs, integrated education and training programs, or work-based learning.

Section 243 (c)(1): Remove "and place such adults in" so that the text would read, "prepare adults who are English language learners for unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency; and"

Section 243 (c)(2): Revise the text to read, "integrate with the local workforce development system and its functions to carry out the activities of the program, including the identification of in-demand industries and the placement of adult English language learners in unsubsidized employment within these industries."

PROGRAMS FOR CORRECTIONS EDUCATION

Reporting rates of recidivism is a challenge for the one-stop delivery system as a whole. For example, Title II corrections education is provided to inmates in a range of distinct correctional institutions; adult education and literacy program staff have no control over release schedules or arrangements. The Title I one-stop center delivery system as a whole is required to provide follow-up services to former participants, including former offenders. Follow-up also is difficult for the Title I centers because offenders leave the criminal justice system from distinct institutions and under various court orders. In addition, the former offender population is highly mobile within the communities to which they return and many former offenders move from the community where they initially located to another. While reducing recidivism is a laudable goal, former offenders who received corrections education would have contact generally with the corrections institution, parole officers, or courts, and not the state eligible agency. Thus, collecting data on offenders who participated in corrections education and who recidivate within some mutually designated time frame is most appropriately the responsibility of the corrections institution and not the state eligible agency.

Recommendations

Section 225 (d): Delete the phrase “including the relative rate of recidivism for the criminal offenders served.”

Section 169 (b): RESEARCH, STUDIES, AND MULTISTATE PROJECTS.— add a new (K) STUDY ON CORRECTIONAL EDUCATION AND TRAINING.-- The Secretary of Labor, in coordination with the Secretary of Education and the Secretary of Justice, may conduct a study to determine the feasibility of, and potential means to replicate the measurement of recidivism for former criminal offenders who participated in Title I adult employment and training activities or Title II correctional institution education programs to improve the quality and performance of such program services or activities.

DIGITAL LITERACY

Digital literacy has rapidly become the cornerstone of educational and employment success, and will be essential for re-employment of the workers who have been displaced by the pandemic. Adult education offers an avenue to gaining basic and more advanced digital skills. During the pandemic response, programs have moved to virtual and hybrid instruction and the field has united in offering training for instructors. Yet, more emphasis is needed on this component of adult education. Adults enrolled in AEFLA programs need technology tools and help in securing internet connections to make the important transition to digital resilience. Increased funding for AEFLA would allow programs to provide this assistance to the millions of adults needing it. Additionally, AEFLA providers would benefit by adding Digital Navigators to their essential staff; current levels of funding may prevent this.

Recommendations

Add Section 202 (5): “assist adults who are basic skills deficient, or who are lacking a secondary school diploma or English language proficiency to acquire the digital literacy skills necessary to navigate the educational, employment, government, and various civic and public systems for personal and economic success.”

Section 203 (2): Add “digital literacy.”

Section 203 (3): Add definition of digital literacy from the updated Museum and Library Services Act of 2018 (P.L. 115-410) which defines digital literacy as “(A) using technology to enable users to find, evaluate, organize, create, and communicate information; and “(B) developing digital citizenship and the responsible use of technology.”

HIGH QUALITY PROFESSIONAL DEVELOPMENT SYSTEMS

Providing high quality professional development is critical for adult education, as there are few degree preparation programs designed to prepare individuals for the specific rigors of instructing adult basic education students. The majority of instructional personnel who enter the field must rely on the training offerings of their state to develop the unique skills needed to help students achieve success. Increased resources for State Leadership would help to ensure a highly trained and competent cadre of instructional personnel. Professional development offerings must target the most needed and effective strategies.

Recommendations

Section 222 (a)(1): Revise to state, “shall use not less than 80 percent of the grant funds to award grants and contracts under section 231 and to carry out section 225, of which not more than 20 percent of such amount shall be available to carry out section 225;”

Section 222 (a)(2): Revise to state, “shall use not more than 15 percent of the grant funds to carry out State leadership activities under section 223; and”

Section 223(a)(1): Revise to state:

- (A) The provision of technical assistance on the role of eligible providers as one-stop partners to provide access to employment, education, and training services and alignment of adult education and literacy activities with other core programs and one-stop partners, including eligible providers, to implement the strategy identified in the unified State plan under section 102 or the combined State plan under section 103 to provide access to employment and training services for individuals in adult education and literacy activities.
- (B) The establishment or operation of high quality professional development programs to improve the instruction and programmatic activities provided pursuant to local activities required under section 231(b) related to the specific needs of adult learners to help improve their literacy, numeracy, and digital literacy skills; and dissemination of information about models and promising practices related to such programs.

- (C) The provision of technical assistance to eligible providers of adult education and literacy activities receiving funds under this title, including the development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training.
- (D) The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities and the dissemination of information about models and proven or promising practices within the State.

LOCAL ADMINISTRATIVE COST LIMITS

The Section 233 text includes professional development as an administrative cost against the 5 percent administrative cap for local adult education and literacy program providers. Professional development directly affects the provision of adult education and literacy activities. It is unlike other functions associated with administration such as planning, financial and payroll management, and supervising the alignment of activities with Title I and one-stop partner activities. Professional development is akin to various state leadership activities under Sec. 223 that require technical assistance to eligible providers to improve system effectiveness and develop and implement programs that achieve the objectives of Title II. (Professional development is not included as an administrative cost in WIOA Title I regulations. Additionally, professional development is not considered an administrative cost in other federal education programs.) NASDAE recommends the following change to remove professional development costs from the cap placed on administrative activity for local programs:

Recommendations

Section 233 (a)(1): Revise the text to read, “not less than 95 percent shall be expended for carrying out adult education and literacy activities and the professional development of individuals who provide direct services to program participants; and”

Section 233 (a)(2): Remove “professional development” from the text so that the section would read, “the remaining amount, not to exceed 5 percent, shall be used for planning, administration (including carrying out the requirements of section 116), and the activities described in paragraphs (3) and (5) of section 232.”

CREATING A STRONG STATEWIDE ADULT EDUCATION SYSTEM

The requirements for local providers of Adult Education must be sufficiently stringent to ensure programmatic and instructional excellence, but should be clear that previous engagement with the system is not requisite for a funding award.

Recommendation

Section 231(e)(3): Revise this section to the following language: “past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially with respect to eligible individuals

who have low levels of literacy. The eligible provider must demonstrate the capacity to meet State-adjusted levels of performance described in section 116, however, providers not previously funded and reporting to AEFLA may demonstrate capacity with alternate sources of validated data.

PERFORMANCE ACCOUNTABILITY: EFFECTIVENESS IS SERVING EMPLOYERS

It is difficult to quantify two of the three indicators of effectiveness introduced by the Departments of Labor and Education. Only one, retention in employment is more easily quantifiable, and retention also appears to be valued by employers because they can save outreach and recruitment and training resources by retaining employees, but does not speak to the quality of the job or the wage earned.

Recommendations

Section 116 (b)(2)(A)(iv): Add “and require state annual performance reports including information on the effectiveness of the core programs in serving employers, including narrative describing accomplishments and challenges.

Section 116(f)(1)(A): Revise to delete a reference to the effectiveness in serving employers indicator. The revised text would read: “If a State fails to meet the State adjusted levels of performance relating to indicators described in the subsection (b)(2)(A) (I) through (V) for a program for any program year, the Secretary of Labor and Secretary of Education shall provide technical assistance, including assistance in the development of a performance plan.

- *ways to develop, modernize, and diversify the national apprenticeship system, including innovative approaches such as youth apprenticeship and pre-apprenticeship*

Title II adult education programs are emerging as a key component in preparing individuals for apprenticeship, by offering robust pre-apprenticeship and bridge curriculum designed to prepare participants for the rigor of the apprenticeship program.

Apprenticeship programs can provide the opportunity for adult learners to earn while they are learning an in-demand trade, however most apprenticeship programs require a high school diploma or equivalent. Creating opportunities for adults with high school level skills to earn the diploma while participating in the apprenticeship program would bolster enrollment in apprenticeships.

- *strategies to encourage innovation to address worker and industry needs*

Incentives for businesses to offer paid time off for participation in adult education programs would benefit the industry and the specific business. Adult education programs are skilled at creating curriculum to meet the unique business needs.

State Directors of Adult Education have contributed the above comments and recommendations, and appreciate the opportunity to provide input. Any questions or requests for additional information may be directed to me by email: ptyler@nasdae.org

Sincerely,

A handwritten signature in blue ink that reads "Patricia H. Tyler". The signature is written in a cursive style with a large initial "P".

Patricia H. Tyler
Executive Director

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