



NASDAE
National Association of State
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NASDAE is a professional organization which exists to provide implementation resources to the state administrators of the Adult Education and Family Literacy Act, Title II of the Workforce Innovation and Opportunity Act (WIOA). We appreciate the opportunity to provide the following comments on the Senate reauthorization proposal.

[p. 49, Line Number: 5-6, 10-11, 18-19, 24-25, Chapter 3, Section 119(b)(2)(A)(1)]

- Feedback #1: strike “related to the training or services received”
- NASDAE finds the caveat “related to the training or services received” to pose two unintended consequences for program implementation: (1) it creates a burden to define and capture the data, and (2) it creates an undesirable effect on performance achievements for the program and the participant, in that we have focused on transferable skills in Title II programming in order that a participant is not locked-in to a specific job, without a strong flexible, foundational skill base. Additionally, during the time period for reporting performance, many of our participants will accept positions for career advancement or higher compensation that may be outside of the position for which they originally trained.

[p. 50, Line Number: 8-12, **and** p. 51, Line Number: 8-14, Section 119 (b)(2)(A)(1)]

- Feedback #2: strike “subject to clause iii”
- Feedback #3: strike clause iii
- NASDAE finds it unrealistic to place a limit on the number of recognized high school credentials earned by participants that may be counted as a performance achievement, as this achievement is a culminating exit point for many of the Title II participants, as well as serving as a gateway to many employment entry and advancement opportunities. Furthermore, high school completion credentials are earned by many parents/caregivers who will influence the educational trajectories of countless numbers of children who represent the future workforce. As the educational partner of workforce preparation, Title II should not be held to this limitation as long as there are no other high school completion options extant within federal programming. It would be widely resisted, should it be proposed, to add such limitations to high schools and colleges for their achievement reporting.

[p. 50, Line Number: 2-4, Section 119(b)(2)(A)(1)]

- Feedback #4: strike “as a percentage of the median earnings of a high school graduate in the State during the most recent year for which data is available”
- While this may seem an equitable comparison, it neglects to account for variables such as age/maturity, experience, technical skills, and other workplace essential skills.

[p.50, Line Number: 11-12, Section 119(b)(2)(A)(1)]

- Feedback #5: retain the language “within one year after exit from the program”
- One year is a reasonable expectation for measuring post-participation achievements. The Senate-released Section-by-Section document indicated that there would be a measurable skill gain indicator that is calculated at six months “after program entry.” While we do not find this in the Bill’s Performance Accountability text, Title II would register concern about such a measure that does not align with our reporting cycles or structures of periods of participation nor with our students’ academic achievement trajectories. Additionally, the proposal to adjust reporting outcomes to six months would eliminate the achievements of participants who will succeed within a year.

[p.50, Line Number: 14-15, Section 119(b)(2)(A)(1)]

- Feedback #6: strike “enrolled in the program for at least 2 quarters”
- This language seems to add an arbitrary timeframe that ignores differing levels of tangible capacity to engage in education and training activities, as well as discounting achievements of participants with high levels of motivation and time. Adult education participation is reported annually and measured within periods of performance.

[p. 210, Line Number: 21-28, p. 211, Line Number 1-8, Section 134 (C)(3)(D)]

- Feedback #7: Addition of clause requiring referral to Title II Adult Education and Family Literacy Activities AEFLA) for co-enrollment
- This appropriate referral should be accompanied by an assurance that the Title II AEFLA program is entitled to training dollars to support the services provided.

[p. 235, Section 151]

- Feedback #8: Youth emphasis.
- NASDAE notes and appreciates the inclusion of young adults to age 24 as eligible for Job Corps and furthermore, appreciates the emphasis this Bill places on service to opportunity youth. Title II programs served 286,958 youths between the ages of 16 and 24 with employment barriers in program year 2022-2023. This group of eligible individuals need a range of services and options to prepare for college and career and we welcome additional programming and funding to provide those services.

[p. 403, Line Number: 23-24, Section 201 (1)(A)]

- Feedback #9: Addition of ‘digital literacy’ to purpose of AEFLA: revise to “digital literacy skills for eligible individuals with foundational skill needs.”
- NASDAE recommends that the statute clarify that digital literacy instruction is key for the “eligible individuals with foundational skill needs” and not risk the unintended consequence of

allowing any adult with low digital literacy to be assumed as an eligible individual for AEFLA services. Title II is an under-resourced program and cannot be tasked with additional requirements to meet the digital literacy skill needs for adults who are otherwise not facing foundational skill needs.

[p.411, Line Number:1-5, Section 207]

- Feedback #10: coordinate with activities supported under the Carl D. Perkins Career and Technical Education Act of 2006
- While coordination with activities supported under the Perkins Career and Technical Education Act has long been a goal of AEFLA programs, it has not been uniformly or substantially achievable. NASDAE recommends removal of this clause until a commensurate clause in the Perkins legislation can be added (reauthorization is not currently underway).

[p. 421, Line Number:13-22, Section 211(2)(A) and 211(2)(B)]

- Feedback #11: Addition of an allowance of 10% of funds for professional development for adult educators; relegation of professional development of administrative staff to administrative costs.
- NASDAE has long advocated for and appreciates the acknowledgement of professional development costs as a separate line item in local contracts and grants. However, we see that the Senate committee has made a distinction between “adult educators” and “administrative staff.” Administrative staff’s professional development is still listed under Administrative costs and limited by the five percent cap on that fund; educators are included in the new line item that has a 10 percent cap. NASDAE would argue that all program staff funded by AEFLA are “adult educators.” According to the latest national data at NRS.ed.gov, 70 percent of the entire adult education workforce is part-time personnel and, in reality, there is often little distinction between administrative and instructional staff and many staff members play multiple roles in an organization. Therefore, it is unlikely that programs could easily or reliably implement a split in funding for these two groups and state eligible agencies could not monitor this requirement. NASDAE recommends that all staff be assumed to be adult educators and utilize the 10 percent professional development fund.

[p. 426, Line Number: 8-12, Section 214]

- Feedback #12: Goals of the Integrated English Literacy and Civics Education program
- NASDAE appreciates the update that the Senate bill incorporates to remove from the definition of this program the responsibility to “place” individuals in employment. Title II is not funded to provide job placement, but is well-aligned to workforce partners who can assist students in job placement.