



12 COMMENTS FOR OCTAE ON WIOA REGULATIONS & GUIDELINES
from the National Council for Adult Learning
(formerly Council for Advancement of Adult Literacy)
Docket ID: ED-2015-OCTAE-0003

May 25, 2015

1. **Proposed 677.155.** WIOA requires states to measure “the percentage of program participants who are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.” The skill gains are not arbitrary. However, the proposed performance accountability system for Title II programs includes academic indicators and performance measures, but does not directly include work-based performance measures. Skills must be related to credentials or employment and should include work-readiness certification and other employability measures, skills needed to enter and succeed in job training (including training that is not at the postsecondary level), and preparation for successful college completion (including degrees and job-skill certification). The Adult Education system must support the employability employment and employment priorities of WIOA.

2. **Proposed 677.155.** The National Reporting System (NRS) reports that Workplace Literacy Program services to incumbent workers have dropped dramatically since the 2000 Program Year (from 100,000 to 5,000). Under WIA, OCTAE and many states gave priority to developing pre-employment programs (career pathways, etc.). But WIOA defines “*workplace adult education and literacy activities*” more broadly, as those “offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location designed to improve the productivity of the workforce.” Service to employers must now include “workplace adult education and literacy activities” in order to directly address employer needs, and that service must seek to connect job seekers and workers with the needs of employers and the regional economy. States will be required to report on their effectiveness in these areas. Thus, programs will have to document program experience and positive outcomes—such as the annual number of workplace programs funded in each state, enrollment in those programs, workplace

skills attained, reduced employee turnover, and increased worker promotions.¹ Such documentation should be explicitly indicated and required in the Guidelines. In addition, NCAL believes that OCTAE should redevelop a National Leadership role to help states initiate a much higher level of service to employers and their workers.

3. **Definitions.** OCTAE should make it clear that “workforce” means both pre-employment and our nation’s 24 million lower-skilled incumbent workers (as identified by OCTAE). It should be made explicit that Title II adds new activities to adult education and literacy services, including integrated education and training and workforce preparation. At the same time, OCTAE should be explicit that basic education programs and essential sequential programs that precede occupational instruction (the dominant mode now for very low-skilled adults) are appropriate and allowed as long as transition competencies are provided.

4. **Performance Accountability System (PAS).** (a) Regulations should require that all performance measures be activated for Title II programs. Under WIA, NRS included less than half of the legislated PAS measures. (b) Currently, Career Pathways do not have nationally recognized performance measures. In collaboration with the Department of Labor, the Department of Education should work with state and local programs to develop these measures, and incorporate them into the reporting system.

5. **State Plans and Planning.** OCTAE states that “WIOA requires states to implement adult education content standards that are aligned to their standards under Title I of the Elementary and Secondary Education Act of 1965.” But Adult Education has not been part of ESEA since 1991. And half of the states administer their Adult Education program through predominately adult-serving state entities other than state K-12 agencies, such as community college boards and systems, departments of labor, and workforce development coalitions.² We suggest that the Department of Education clarify this provision.

6. **State Plans and Planning.** The Departments of Education and Labor should monitor the development of state plans to assure that all components of local Adult Education systems are fully represented and reflected in planning – e.g., ESL/immigrant, corrections, family literacy, workplace, workforce, professional development, distance learning and technology, services to incumbent workers, union adult education programs, and links to state (and regional) economic and community development entities and other key stakeholder groups.

¹ See *Workplace Education: Twenty State Perspectives*: www.caalusa.org/content/parkerpolicybrief.pdf

² See *Invitation to a Roundtable: A Discussion of Return on Investment in Adult Education and Stepping Up to ROI In Adult Education: A Survey of State Activity*, by James Parker and Gail Spangenberg for Council for Advancement of Adult Literacy, at: www.caalusa.org/InvitationtoRoundtable.pdf and www.caalusa.org/SteppingUptoROI.pdf.

7. **State Plans and Planning.** To support comprehensive planning and coordination between Title I and Title II activities, and to encourage partnerships, State Title II Adult Education officials should include in their plans and reporting the range and inclusiveness of planning (i.e., indicate who the local planning partners are and the nature of collaboration with Title I entities).
8. **State Plans and Planning.** State plans should be required to provide information about overall program costs and show how various sources of funding fit into the overall likely funding pattern.
9. **Proposed 463.21.** The regulations require that a provider that applies for funding submit the application to the local board for review. A stronger requirement might be for the board to review the plan for evidence of local participation in its formation.
10. **Proposed 463.23.** Only agencies that have successful experience in operating adult education and family literacy programs may apply for funding. This language appears to prohibit any new provider agency unless that agency has operated adult education with funding other than WIOA dollars. From time to time an eligible agency may wish to encourage formation of a new provider in an area that has not been given sufficient service. In such a situation, the eligible agency might wish to examine the past experience of the staff of the new provider in determining worthiness for funding.
11. **Proposal 463.30.** Although the regulations do not spell this out, it appears that the funding for integrated English literacy and civics education (as added to by connections to high school completion and postsecondary education opportunities) must be used for that purpose. This regulation might be clarified. The balance of the funding may support any of the activities listed in proposed 463.30 integrated including English and civics education and integrated education and training.
12. **Proposed 463.37.** It is not clear whether providing each of the three components of integrated education and training separately during a single day would qualify as “sufficiently integrated?” Is it intended that workforce preparation, basic or English language skills, and occupational skills *all* be represented to be considered “integrated”? The language about this should be clarified.