

Funding Career Pathways and Career Pathway Bridges

A FEDERAL FUNDING TOOLKIT FOR STATES

CENTER for POSTSECONDARY *and*
ECONOMIC SUCCESS



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Revised Edition

About CLASP

CLASP develops and advocates for policies at the federal, state, and local levels that improve the lives of low-income people. In particular, we seek policies that work to strengthen families and create pathways to education and work. For more information, visit www.clasp.org.

About the Center for Postsecondary and Economic Success

The Center for Postsecondary and Economic Success is a policy and advocacy initiative within CLASP. The mission of the center is to advocate for policies and investments that can increase the number of low-income adults and disadvantaged youth who earn marketable postsecondary and industry credentials that are essential to opening doors to good jobs, career advancement, and economic mobility.

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Introduction

Postsecondary education—broadly defined as a credential beyond a high school diploma—continues to be one of the major gateways to family-sustaining jobs. Workers with higher levels of education and skills tend to have greater earnings than workers with lower levels. In 2011, associate's degree holders earned about 20 percent more than high school graduates with no college and 70 percent more than workers with less than a high school diploma.¹ Having a postsecondary education also offers some protection in a weak economy because workers with higher levels of education are less likely to become unemployed than workers with lower levels. In 2011, the unemployment rate was just 4.9 percent for individuals with a bachelor's degree and 6.8 percent for those with an associate's degree. Workers with less than a high school diploma experienced unemployment at about twice the rate of workers with an associate's degree.²

There is growing recognition of both the individual and national benefits of helping more people succeed in postsecondary education. Long-term economic trends point to increasing demand for better educated workers. By 2020, economists project that 65 percent of all jobs will require at least some postsecondary education. Demand for bachelor's degree holders and those who have completed at least some college without receiving a degree is expected to be particularly strong: 24 percent of jobs in 2020 are projected to require a bachelor's degree (compared with only 9 percent in 1973) and 18 percent may require some level of college education.³

At the same time, our adult education, workforce development, and postsecondary education systems frequently have disconnects that can be barriers to progress for

individuals with low education and skill levels. Too often, adult education and English language programs are not connected to job training or other postsecondary education programs. Many colleges have no connections between their developmental education programs and their occupational and academic programs. Noncredit occupational education is disconnected from for-credit certificate and degree programs. And too few programs at any level are attuned to employer and industry needs.⁴

DEFINITIONS: CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Career pathways are an approach that many states are adopting to fix fragmented and leaky educational pipelines. Career pathways are linked education and training services that enable students to advance over time to

successively higher levels of education and employment in a given industry or occupational sector. Each step on a career pathway is designed to prepare students to progress to the next level of employment and education.⁵ The career pathways approach is a framework for weaving together adult education, training, and postsecondary programs, and connecting those services to the workforce needs of employers. Career pathways tend to include multiple entry and exit points, learner-centered instruction and delivery, assessment of skills and needs, support services, and quality work experiences.⁶

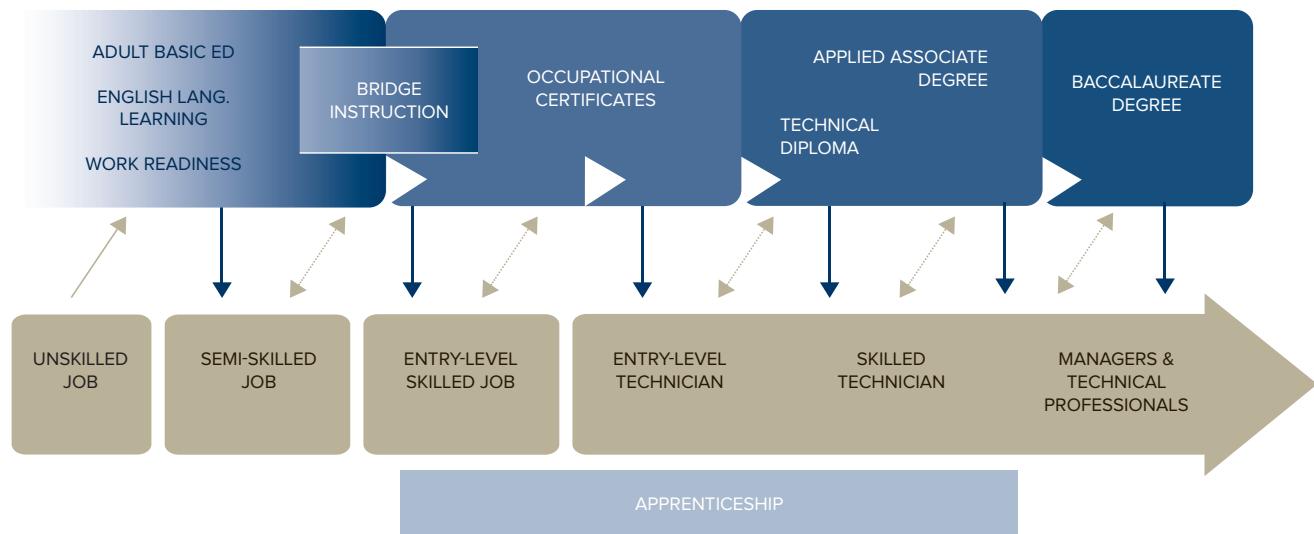
Career pathway bridge programs or instruction are an extension of the career pathways concept, designed spe-

cially for adults and youth with lower education and skill levels as a first step articulated with the academic and technical content of the next step of the pathway. Through new curricula, innovative delivery modes, and joint planning and instruction, this model helps bridge the skills gap that can prevent individuals with limited basic skills from entering and succeeding in postsecondary education. Well-designed career pathway bridges incorporate most of the elements of career pathways, such as support services and a strong role for employers. In addition, because they are an on ramp for lower-skilled

individuals, bridges combine basic skills with career-technical content, and they contextualize basic skills and English language to the knowledge and skills needed in specific occupations. Career pathway bridges may employ integrated instruction (team teaching) or dual enrollment in basic skills and career-technical education courses.

Since the 2010 release of the first edition of CLASP's funding toolkit, momentum to build and expand the use of career pathways has increased considerably. A number of states have explored or adopted career pathways aimed at adults or out-of-school youth or are engaged in career pathway bridge initiatives. To support further

CAREER PATHWAYS AND CAREER PATHWAY BRIDGES



Credit: Wisconsin Regional Industry Skills Education (RISE) Initiative

specifically for adults and youth with lower education and skill levels as a first step articulated with the academic and technical content of the next step of the pathway. Through new curricula, innovative delivery modes, and joint planning and instruction, this model helps bridge the skills gap that can prevent individuals with limited basic skills from entering and succeeding in postsecondary education. Well-designed career pathway bridges incorporate most of the elements of career pathways, such as support services and a strong role for employers. In addition, because they are an on ramp for lower-skilled

state implementation, CLASP has launched the Alliance for Career Pathways, a state-driven initiative to develop a framework for high-quality career pathways, including criteria and performance metrics.

Congress and the Obama administration are also increasingly supportive of career pathways. Recent Workforce Investment Act reauthorization proposals have promoted this strategy as a way to knit together policies and funding for a range of education, workforce development, and related programs. In 2012, the Departments of Educa-

tion, Health and Human Services, and Labor issued a joint letter highlighting their commitment to building the research base and expanding this promising strategy across the country.⁷ Each of these departments has also issued competitive grants encouraging the implementation of career pathways for different populations.

The first edition of the funding toolkit was widely cited and used at the federal, state, and local levels. This new edition includes fresh state and local examples and revised program profiles reflecting critical legislative and administrative changes to key federal programs. Of all the elements of career pathways, support services are among the most important for ensuring student success, yet they are also the most difficult to fund. A new appendix identifies 10 federal funding sources that can be used to provide a wide range of support services for participants in career pathways and career pathway bridges.

Using the Toolkit

This toolkit is designed to help interagency state teams identify and use federal resources to support career pathways and career pathway bridges for adults and out-of-school youth. Specifically, the toolkit aims to help states:

- Understand possible key components and tasks involved in developing, implementing, and maintaining career pathways and career pathway bridges,
- Identify how federal resources can support these key components and tasks, and
- Pinpoint state policy changes or other state actions needed to fully realize federal funding opportunities for pathways and bridges that connect to them.

WHO SHOULD USE THIS TOOLKIT?

This guide will be most useful for state-level interagency teams engaged in discussions about resources and policies across workforce development, adult education, postsecondary education, and human service programs that can support career pathways and career pathway bridges. In addition, the federal program summaries will aid regions and communities seeking to better understand federal resources that can support career pathway and career pathway bridge efforts at the regional or local level.

HOW TO USE THIS TOOLKIT

This toolkit is divided into three sections: a funding options worksheet; federal program summaries; and an appendix on federal funding sources for support services.⁸

We recommend three steps for using the toolkit to identify how federal programs might support a state's career pathway and career pathway bridge efforts:

STEP 1: Review the key tasks for building career pathways in the funding options worksheet included in this toolkit. Use the blank worksheet provided or download the worksheet from the CLASP Web site to customize the key tasks for the state's specific initiative.

- Identify the target populations.
- List the key tasks for developing and implementing your approach under each of the main sections: Business and Industry Engagement; Program Innovation; Student Supports and Student Success Services; Student Aid; and Systems and Partnerships.

Note: You may want to use the sample tasks provided or customize tasks based on the specific interests or needs of the state.

STEP 2: Review the federal program summaries and the appendix on support services to identify resources that might support your state's career pathways initiative. Complete the worksheet with specific information on how individual federal programs can support key tasks in your state's career pathways initiative.

- Read the program summaries and note state examples, program limitations, and opportunities.
- Review the appendix, which identifies the types of support services that participants may need and the various federal resources that can fund them.
- Use the worksheet to record how you can use multiple federal programs. Some states may want to include just one or a few programs per worksheet, with details about each funding source. Other states may want to include a column for each of the 10 federal programs and simply check off which federal funding sources can fund specific tasks. It may be useful to complete multiple worksheets, grouping similar federal programs on each.

STEP 3: Identify state policy changes or actions needed either to remove barriers to supporting career pathways and bridges or to encourage wider use of federal resources to support these approaches. State teams can use the following questions to identify opportunities for braiding funding streams and begin creating plans for moving forward:

- What services, including support services, do the target populations need to succeed in career pathways and bridges?
- What funding streams are available to pay for those services?
- What partnerships exist, and are there opportunities to build on them to extend their reach?
- Are all key stakeholders needed for strong partnerships at the table?
- What steps can be taken at the state level to align the administrative requirements associated with braiding various funding streams?

OVERVIEW OF FEDERAL PROGRAM SUMMARIES

This toolkit includes summaries of 10 federal programs that can support various components of state career pathways and career pathway bridges. Four federal departments administer these programs.

Administered by the U.S. Department of Labor:

- Workforce Investment Act Title I: Adult and Dislocated Worker
- Workforce Investment Act Title I: Youth
- Trade Adjustment Assistance
- Registered Apprenticeship and Pre-Apprenticeship
- Employment Service (Wagner-Peyser Act)

Administered by the U.S. Department of Education:

- Workforce Investment Act Title II: Adult Education and Family Literacy Act
- Pell Grants
- Carl D. Perkins Career and Technical Education

Administered by the U.S. Department of Health and Human Services:

- Temporary Assistance for Needy Families

Administered by the U.S. Department of Agriculture:

- Supplemental Nutrition Assistance Program Employment and Training

Some of these federal resources may be more supportive of certain key tasks than others. For example:

Federal programs that may support staff to perform tasks relevant to **business and industry engagement and systems and partnerships:**

- Employment Service (Wagner-Peyser Act)
- Temporary Assistance for Needy Families
- And others

Federal programs that may support **program innovation**:

- Workforce Investment Act Title II: Adult Education and Family Literacy Act
- Carl D. Perkins Career and Technical Education
- And others

Federal programs that may support **student support** and **student success services**:

- Temporary Assistance for Needy Families
- Supplemental Nutrition Assistance Program Employment and Training
- Carl D. Perkins Career and Technical Education
- And others

Federal programs that may help with **tuition and other costs of education/training**:

- Workforce Investment Act Title I: Adult and Dislocated Worker
- Pell Grants
- Trade Adjustment Assistance
- And others

FUNDING OPTIONS WORKSHEET

Below is a tool that lists sample key tasks in designing, implementing, and sustaining career pathway and career pathway bridges. An electronic version of this tool that can be customized for your state can be found on the CLASP Center for Postsecondary and Economic Success Web site.

Major Federal Funding Streams That Support Key Tasks in Building Career Pathways and Career Pathway Bridges

KEY TASKS	FEDERAL PROGRAM A	FEDERAL PROGRAM B
TARGET POPULATION: (e.g., TANF recipients, at risk or out-of-school youth)		
BUSINESS AND INDUSTRY ENGAGEMENT		
<ul style="list-style-type: none">• Identify sectors and employers within sectors needing skilled workers and offering employment opportunities at different levels• Identify the skill needs and employment opportunities at different levels to inform creation of related educational opportunities• Create hands-on learning opportunities hosted or sponsored by employers, such as job shadowing, internships and work experience		

KEY TASKS	PROGRAM INNOVATION	FEDERAL PROGRAM A	FEDERAL PROGRAM B
	<ul style="list-style-type: none"> Define, with employer input, the steps leading to certificates, licenses or degrees and relevant employment opportunities at each level 	<ul style="list-style-type: none"> Maximize the ability to build toward credentials over time through articulation and transfer (dual enrollment), especially between credit and non-credit offerings 	
	<ul style="list-style-type: none"> Create “Road Maps”—visual representations of educational and employment pathways 	<ul style="list-style-type: none"> Create or re-write curricula for short-term credentials linked to jobs and imbedded in educational pathways 	
	<ul style="list-style-type: none"> Develop instructional formats that accelerate and compress content 		<ul style="list-style-type: none"> Make programs accessible to non-traditional students through flexible scheduling and alternative locations and innovative use of technology

KEY TASKS	FEDERAL PROGRAM A	FEDERAL PROGRAM B
PROGRAM INNOVATION (continued)		
<ul style="list-style-type: none"> • Enroll students in groups through learning communities, etc. 	<ul style="list-style-type: none"> • Combine basic skills with occupational training (in both developmental education and ABE/ESL) to enable low-skilled adults to enter and complete programs leading to credentials 	<ul style="list-style-type: none"> • Build essential skills needed for career and postsecondary success
		<ul style="list-style-type: none"> • Increase awarding of credit with wider use of credit for prior learning
		<ul style="list-style-type: none"> • Pay for unreimbursed program costs (e.g., equipment and faculty time for team teaching) not fully covered by tuition and institutional support

KEY TASKS	FEDERAL PROGRAM A	FEDERAL PROGRAM B
STUDENT SUPPORTS AND STUDENT SUCCESS SERVICES		
<ul style="list-style-type: none"> Provide career planning and assessment services 		
<ul style="list-style-type: none"> Provide academic support and tutoring 		
	<ul style="list-style-type: none"> Provide case management and coaching, including navigation of financial aid options and educational programs 	
	<ul style="list-style-type: none"> Provide support services, such as child care and transportation 	
	<ul style="list-style-type: none"> Provide mentoring for youth 	
	<ul style="list-style-type: none"> Enable students to participate in work experience, internships 	
	<ul style="list-style-type: none"> Make available job search assistance and placement assistance 	

KEY TASKS	FEDERAL PROGRAM A	FEDERAL PROGRAM B
STUDENT AID	<ul style="list-style-type: none"> • Provide direct student assistance (e.g., tuition, fees, books and supplies) or pay for the costs of student participation in education and training programs • Cover indirect costs of attendance (e.g., living expenses) 	
SYSTEMS AND PARTNERSHIPS	<ul style="list-style-type: none"> • Identify/Employ dedicated staff to maintain business/education and other pathway partnerships with community organizations, such as labor or community-based organizations • Use data to identify sectors and related educational and employment pathways 	<ul style="list-style-type: none"> • Use data to measure student progress and transitions to career and postsecondary success and evaluate program performance

FEDERAL PROGRAM SUMMARIES

Programs Administered by the U.S. Department of Labor:

Workforce Investment Act Title I: Adult and Dislocated Worker	17
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Trade Adjustment Assistance.....	24
Registered Apprenticeship and Pre-Apprenticeship	27
Employment Service (Wagner-Peyser Act).....	30

Programs Administered by the U.S. Department of Education:

Workforce Investment Act Title II: Adult Education and Family Literacy Act	32
Pell Grants	36
Carl D. Perkins Career and Technical Education Act	40

Programs Administered by the U.S. Department of Health and Human Services

Temporary Assistance for Needy Families.....	43
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Programs Administered by the U.S. Department of Agriculture:

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Workforce Investment Act Title I: Adult and Dislocated Worker

Overview: The Workforce Investment Act (WIA) authorizes the nation's federally funded workforce development system and provides funding for "one-stop" career centers in which employers and jobseekers can access a wide array of employment and training services. The Act consists of Title I (adults, dislocated workers, and youth), Title II (adult education and literacy), Title III (workforce investment-related activities), Title IV (vocational rehabilitation), and Title V (general provisions). WIA Title I includes three main funding streams distributed to states: adult, dislocated worker, and youth (see the next summary on WIA Title I: Youth).

Type of Program: Formula grants to states and localities. A portion of funds from the adult and dislocated worker funding streams is reserved at the state level for statewide activities. An additional portion of the dislocated worker funds is reserved at the state level for rapid response activities that address large-scale layoffs and economic dislocation. The remaining funds are distributed to local areas by formula.

Eligibility and Targeting: Under WIA Title I, "adults" are individuals age 18 and over. "Dislocated workers" include those who have been laid off or have received notice of termination from employment, are self-employed but unemployed due to general economic conditions, or are displaced homemakers. The adult funding stream incorporates a priority on service for public assistance recipients and other low-income individuals when funds are limited. Also, veterans are a priority population as a result of the Jobs for Veterans Act of 2002.

Services/Program Support: Services under the WIA Title I adult and dislocated worker funding streams range from information about careers and the local labor market, job search assistance, case management, assessments, and the development of employment plans, to a variety of training services, such as occupational skills training, on-the-job training, customized training, and adult education and literacy in combination with other training services. Local areas also may provide supportive services and needs-related payments to assist individuals participating in employment and training activities.

Non-federal Funds: There are no state matching requirements under WIA.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

WIA adult and dislocated worker funds can be used to support several components of career pathway and career pathway bridge initiatives, including industry engagement, tuition, case management, and support services.

Several states and local areas have used WIA funds to support these initiatives in order to help employers find the skilled workforces they need and to ensure that program participants can move into jobs and careers that provide family-supporting wages.

FEDERAL FUNDS TO STATES

The portion of adult and dislocated worker funds reserved at the state level for statewide activities is typically referred to as the *governor's reserve or state discretionary funds*. These are more flexible than *local formula funds*. States have used them to support the startup and implementation of career pathway and career pathway bridge efforts. Recent appropriations legislation reduced the portion of funds reserved at the state level from 15 percent to 5 percent; as a result, states have fewer WIA resources to devote to career pathways initiatives and other statewide activities.⁹

States can also use WIA *incentive funds*—awarded for exceeding negotiated performance targets in WIA Titles I and II—to support innovative programs. These funds have been used to support career pathway and career pathway bridge initiatives.

- **Oregon** has engaged its workforce investment, adult education, and community college systems in its career pathway efforts. The state's initial investment in career pathways came from the governor's reserve, and additional investments were made with four years of funding from WIA incentive grants. These funds supported the original research, the development of pathway initiatives at the first five participating colleges, and the first career pathways academy.¹⁰

FEDERAL FUNDS TO LOCAL PROVIDERS

At the local level, Workforce Investment Boards are responsible for planning and oversight of the use of WIA funds. Local formula funds support the one-stop service delivery system that brings together multiple federally funded workforce development programs and services and pay for the provision of employment and training services for eligible individuals. Services that can be funded through the adult and dislocated worker programs are grouped into three categories, each of which can support individuals participating in career pathway bridges and career pathway initiatives:

1. **Core services.** These include the provision of information about jobs in demand, assistance with applying for financial aid, initial assessment, and outreach and intake.

2. **Intensive services.** These include comprehensive assessment, case management, group and individual counseling, work experience, and short-term, prevocational services to prepare individuals for unsubsidized employment or training.
3. **Training services.** These include occupational skills training, on-the-job training, customized training, job readiness training, and adult education and literacy activities when combined with another type of training.

Individuals do not have to pass through all the layers of service (or spend a particular amount of time in a layer of service) to demonstrate a need for training services. An individual can enter training if an assessment or an individual employment plan identifies the need for skill development. Services in various categories can be provided in sequence, concurrently, or in any order that makes sense for the participant.¹¹

WIA local funds can provide important support for the education and training components of career pathway and career pathway bridges. WIA *intensive funds* can sometimes be used to fund individuals in career pathway bridges through contracts with service providers. WIA *training funds* can be used to provide individuals with training that is part of a career pathway effort.

- More than a decade ago, the *Portland, Oregon, Workforce Investment Board* began partnering with community colleges in the region to create new ways for dislocated workers and low-income adults to enter postsecondary education and acquire credentials for jobs in demand. At the outset of this career pathways initiative, the WIB provided funding for development, capacity building, and services for the first waves of students. The WIB now uses WIA funds to pay the costs of training through Individual Training Accounts and contracts for cohort training.¹²

WIA local funds also can provide important services to help individuals succeed in a career pathway or career pathway bridge, such as supportive services (including child care, dependent care, and transportation), and needs-related payments.

- Under the American Recovery and Reinvestment Act in 2009 and 2010, *Chicago, Illinois*, contracted with community-based organizations to develop and deliver career pathway bridge programs for lower-skilled adults. The organizations also provided coaching and support services to participants. The Chicago Cook Workforce Partnership—a nonprofit agency formed to administer workforce services in the region—supports bridge programs with WIA funds.

Local areas also can use WIA funds to support the employer engagement component of career pathway and career pathway bridge initiatives. Many local WIBs have established business liaison positions within one-stop centers to assist employers with developing and institutionalizing career pathway programs. A number of local WIBs have brought together employers to address industry challenges and training needs.

- The Workforce Development Council (WDC) of *Seattle-King County* in *Washington State* plays a key role in local and regional initiatives for industry-sector training and career pathways. The WDC has particular expertise in convening employers and other partners in sector panels that map out career ladders within industries. These partnerships include the 11 community/technical colleges in Seattle-King County, as well as individual employers, industry associations, and labor groups. For example, the sector panels in maritime, interactive media, health care, and manufacturing have led to stronger partnerships and more training opportunities. Another result is career maps in 10 industries (MapYourCareer.org).

PROGRAM LIMITATIONS

WIA has several restrictions on how training can be paid for and delivered:

- Local administrators are required to fund training by providing Individual Training Accounts (ITAs) for participants to use with eligible providers. For certain exceptions, including customized training and on-the-job training, local administrators can fund training through contracts with service providers. There is an additional exception for a training program run by a private-sector or community-based organization that has demonstrated effectiveness in serving special

populations with barriers to employment. Recent appropriations legislation has expanded the authority for local boards to contract with colleges or other eligible providers to train groups of participants.¹³

- WIA funds generally are not used for curriculum development.
- WIA training funds must be coordinated with other grant assistance. They are restricted to individuals who cannot obtain other grant assistance (such as federal Pell Grants) or require assistance beyond what is available through other sources.
- WIA supportive services are provided to enable an individual to participate in activities authorized under WIA, and individuals must be unable to obtain such support through other programs.
- Incumbent worker training programs are restricted to statewide discretionary funds or, if a state obtains a waiver, a certain percentage of local formula funds.

OPPORTUNITIES FOR STATES

- Use state WIA discretionary funds, if available, to jumpstart the development of career pathway and career pathway bridges.
- Build career pathway and career pathway bridge initiatives into state plans and into guidelines for local plans.
- Consider steps to increase the use of WIA funds for skill development and the attainment of postsecondary and industry-recognized credentials. Some states have required local areas to spend a minimum percentage of WIA funds on training to provide additional support for the educational components of pathway initiatives. To ensure that this type of policy encourages the provision of training services to low-skilled individuals and individuals with barriers to employment, the definition of training expenditures could include the costs of supportive services for participants receiving training, including those receiving training from other funding sources (e.g., Pell Grants). In addition, the definition of training should include programs that incorporate basic skills and English language training.¹⁴

- Ensure that career pathway bridges and training programs that are part of career pathway initiatives are on the Eligible Training Provider List.
- Work with local areas to align training policies across local areas and ensure that ITAs, if capped, are capped at a high enough level to support training within career pathways and career pathway bridges and instruction.
- Work with local areas to orient programs toward longer-term outcomes and employment leading to self-sufficiency. To help participants set long-term employment goals, provide guidance to ensure that career counseling includes a focus on self-sufficiency.¹⁵
- Promote co-enrollment with partner programs, such as Trade Adjustment Assistance and Adult Education, to maximize resources for participants in career pathway and career pathway bridge initiatives.
- Provide information and technical assistance on career pathway and career pathway bridge programs and on how WIA can be used to support participants in these programs.¹⁶

Workforce Investment Act Title I: Youth

Overview: Title I of WIA includes funding streams for adults, dislocated workers, and youth. The intent of the WIA youth funding is to provide comprehensive interventions that prepare youth for labor market and postsecondary success.

Type of Program: Formula grants to states and localities; a portion remains at the state level for the governor's discretionary use (discretionary funds), and most is distributed by states via formula to local workforce areas through Workforce Investment Boards (local funds). Boards are required to contract these funds to local providers through a competitive process.

Eligibility and Targeting: The Act is designed to serve low-income youth who face barriers to continued education and employment. To be eligible, a young person must be age 14 to 21, be low-income, and have at least one of the following barriers:

- Be deficient in basic literacy skills,
- Be a school dropout,
- Be homeless, a runaway, or a foster child,
- Be pregnant or a parent,
- Be an offender, or
- Require additional assistance to complete an education program or secure and hold employment.

At least 30 percent of formula funds must be allocated for out-of-school youth. Youth enrolled in any school or alternative education program at the time of registration are not included in the definition of out-of-school youth.

Services/Program Support: Services provided depend on the specific service strategy customized to each youth. They may include preparation for postsecondary education, linkages between academic and occupational learning, preparation for unsubsidized employment opportunities, and effective connections to intermediaries with strong links to the job market and local and regional employers.

Non-federal funds: There are no state matching requirements under WIA.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Local areas are required to make services available to youth consistent with a service strategy based on an individualized assessment of needs. Each youth's service

strategy must include a career goal and provide access to a variety of services. To meet a range of youth development needs, WIA establishes a set of 10 services—program elements—that must be available in each local area for inclusion in a participant's plan as appropriate. These

services include tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies; alternative secondary school offerings; summer employment opportunities directly linked to academic and occupational learning; paid and unpaid work experiences, including internships and job shadowing; occupational skill training; leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social behaviors; supportive services; adult mentoring for a duration of at least 12 months that may occur both during and after program participation; follow-up services; and comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.

Local Workforce Investment Boards oversee planning for the use of youth funds and the delivery of services to youth. Each local board is required to establish a Youth Council whose members must include, among others, members of the local board with special interest or expertise in youth policy; representatives of youth service agencies, including juvenile justice and local law enforcement agencies; and parents of eligible youth.

The required program elements make this funding stream ideally suited to contribute to the development of supported career pathways for youth who need more intensive assistance in navigating the transitions to college or attaining occupational training, labor market credentials, and employment at economically self-sustaining wages. Some governors have used WIA *state discretionary funds* to support career pathways for youth.¹⁷ Local workforce boards and Youth Councils also have used their *local WIA funds* to support pathways programs for low-income in-school and out-of-school youth.

In **California**, the San Diego Workforce Partnership (SDWP, the San Diego Workforce Investment Board) worked with the San Diego Community College District to develop the Career Pathways for After School Staff. CPASS is a career pathway bridge model for students entering education or human service programs. The model included basic skills remediation, college ready-

ness courses, selected coursework in career pathways, counseling and work experience, and employment in after-school facilities. SDWP provided the planning and development, as well as case management and support services, including \$800 stipends to help pay for transportation, child care, and other living expenses. The California Community Colleges Chancellor's office committed \$1.5 million during 2008-2010 to support five CPASS programs across the state (supplemented with philanthropic funding).

In **Maryland**, the Baltimore Workforce Investment Board uses WIA youth funds to support the Career Academy, an alternative education center jointly administered by the Mayor's Office of Employment Development and the Baltimore workforce board. The Career Academy provides multiple pathways for a student to obtain an academic credential, including earning a high school diploma, enrolling in a GED program, enrolling in a Diploma Plus program, and enrolling in Job Corps. In the Diploma Plus model, students earn a diploma and college credits through the Early College Enrollment program at Baltimore City Community College.

PROGRAM LIMITATIONS

- This funding stream has specific income-eligibility requirements. The maximum household income for participation is set by statute at 70 percent of the lower living standard income level. While this helps target funds to the most needy, it also makes it more complicated to blend these funds with other resources that do not have such a narrow target population.
- All grants and contracts for youth services must be awarded based on a competitive process, adding to the difficulty of negotiating customized training or pipeline programs with specific employers.

OPPORTUNITIES FOR STATES

While the responsibilities for programming the WIA Title I youth funding fall to the local workforce areas, states can assist local areas in moving in this direction in several ways:

- Establish a state youth council (or similar entity) to bring together leaders from across systems and sectors in order to provide state and local efforts with strategic guidance on coordinating and aligning resources and programming across the education, workforce, and state-administered youth-serving systems. While not required by WIA statute, several states have established a state youth council or similar entity.
- Provide technical assistance to strengthen the strategic activities of local boards in order to facilitate coordination among education, workforce, foster care, and juvenile justice systems and provide local areas with labor market and career information.
- Request a federal waiver to allow Title I youth funds to be used for Individual Training Accounts (ITAs) for youth. ITAs, coupled with the counseling and other wraparound supports available in well-designed youth development programs, can provide an effective way for the WIA youth system to offer career pathway bridge programming to help low-income youth access and succeed in postsecondary endeavors.
- Set aside a portion of state discretionary funding, if available, to offer incentives for developing local pathway models. Use the state funding to leverage the expenditure of local WIA youth funds to create career pathways linked to growing areas of the state or regional economy.

Trade Adjustment Assistance

Overview: Trade Adjustment Assistance (TAA) provides benefits and services to workers who lose their jobs as a result of increased import competition, relocation of production or services to any foreign country, or foreign contracting for services. The TAA program offers extended income support, training, employment and case management services, and other benefits to displaced workers who are certified as eligible. Wage subsidies are available to older workers who take new jobs that pay less than their previous jobs. With its potential to support long-term training, TAA enables certified workers to participate in a wide range of education and training options leading to employment. TAA has been reauthorized many times since its creation in 1962; the most recent reauthorization expires at the end of 2014.¹⁸

Type of Program: Individual entitlement to extended unemployment benefits, with funding for training and other services, subject to an overall funding limit set by Congress.

Eligibility and Targeting: Workers must have lost their jobs because their firms faced increased import competition or because the firm's operations were shifted outside the United States. In the past, TAA covered workers "that produced an article," but TAA benefits and services have been extended to workers displaced from service-sector firms. Workers in firms that do business with a trade-affected firm (such as a supplier or downstream producer) also can be eligible for TAA. In addition, workers in firms that have been adversely affected by foreign trade, as determined by the International Trade Commission, are eligible.

To be eligible for TAA, a group of workers must petition the U.S. Department of Labor and become certified. Individual workers covered by the certification can apply for benefits and services at a local one-stop center.

Services/Program Support: TAA benefits include extended unemployment benefits known as Trade Re-adjustment Allowances (TRA). Services may include training, allowances for job search and relocation, employment and case management services, wage subsidies for older workers, and health coverage tax credits as a subsidy for health insurance premiums.¹⁹

Non-federal Funds: TAA is a direct spending program that is fully funded by the federal government.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

TAA is a significant source of financial support to certified workers who pursue extended education and training. Workers who are approved for training can collect up to 130 weeks of income support, including 26 weeks

of regular unemployment insurance benefits in most states. The last 13 weeks of income support are only available to workers who:

- Have exhausted prior weeks of income support,

- Require a longer period of income support to complete an approved training program that leads to a degree or industry-recognized credential, and
- Make satisfactory progress, as measured by training benchmarks established when the worker enrolls in training.

The following table summarizes the amount of extended income support available to TAA participants:

TYPES OF BENEFITS	WEEKS OF INCOME SUPPORT
Basic TRA (first level of TAA)	52 minus the number of weeks of regular UI benefits (26 in most states)
Additional TRA (second level of TAA)	65
Completion TRA (third level of TAA)	13
Maximum Number of Weeks	130

TAA training funds can support the participation of eligible workers in a course or a related group of courses leading toward an occupational goal. Allowable training includes:

- Basic or remedial education,
- Prerequisite education required to enroll in training,
- Classroom training, including training approved under the Workforce Investment Act or training whose costs are paid partly or wholly by another federal or state program,
- Employer-based training, including on-the-job training and customized training, and
- Apprenticeship programs.

TAA participants can undertake remedial education or prerequisite education followed by occupational training,

or they can enroll in career pathway bridges that combine basic skills instruction with occupational training leading to a job or a postsecondary program. Participants can pursue a wide range of education and training options, including training to obtain a degree or certification from an accredited institution of higher education.

Recent legislation greatly increased program flexibility, allowing participants to combine work and training in new ways. Workers who are certified can start training before they are laid off. Receipt of TAA income support requires participation in full-time training. However, workers can choose to participate in part-time training without receiving such income support. They can also combine full-time training with part-time employment.

In addition to training, workers can receive allowances for relocation or job search outside of their immediate geographic area. Workers also have access to case management and employment services, including assessment, counseling, referrals to support services, and information about financial aid.

Minnesota co-enrolls every TAA-certified worker in WIA programs to ensure each worker can receive a full range of services. Each TAA participant is assigned a dislocated worker counselor based in a one-stop center and a TAA program specialist based in the central office.

In **Massachusetts**, it is common for TAA-certified workers to participate in both remedial education and occupational skills training. The state strongly encourages TAA staff to customize remedial education programs and to combine basic skills instruction with occupational skills training leading to a job in a high-demand field.

PROGRAM LIMITATIONS

- TAA benefits and services are only available to workers who have lost their jobs as a result of foreign trade. They must be members of a group that has been certified by the U.S. Department of Labor, and they must be determined to be individually eligible by their state.
- TAA is generally not used for curriculum development or other program support. However, allowable

training costs include those for tuition, fees, tools, and books, as well as supplemental payments for transportation and subsistence costs if training is pursued outside the worker's commuting area.

- Some states cap the amount of training funding that can be spent on a participant, but these caps tend to be much higher than similar ones on WIA training funds.
- Apart from transportation and subsistence costs associated with training, TAA is not used to pay for support services that are typically funded under WIA.
- Total funding for training, allowances for relocation or job search, case management, and employment services and state administration is capped at \$575 million in FY 2012 and FY 2013 and is prorated in FY 2014.

OPPORTUNITIES FOR STATES

- Program administrators should notify TAA participants of the ample opportunities to pursue long-term training while receiving income support.
- State administrators should encourage the use of remedial education in combination with or concurrently with occupational training to accelerate progress toward credentials and employment (such as progress in career pathway bridge programs).
- Co-enrollment of TAA participants in WIA is likely to increase the range of available services, especially support services.
- State administrators should make workers aware of the opportunity to combine work and learning through on-the-job training, apprenticeships, and other training options.
- State administrators should ensure that individuals who are eligible for Pell Grants can use them for living expenses while TAA supports training.

Registered Apprenticeship and Pre-Apprenticeship

Overview: The National Apprenticeship Act of 1937 authorizes the federal government, in collaboration with states, to oversee the nation's apprenticeship system. Registered Apprenticeship programs provide opportunities for participating individuals to gain on-the-job training combined with classroom instruction, leading to portable credentials. Participating employers develop a steady pipeline of skilled workers. As of 2008, there were about 480,000 apprentices in about 27,000 apprenticeship programs registered with the U.S. Department of Labor's Office of Apprenticeship. Some estimate that there might be another 500,000 or more individuals in unregistered programs.²⁰

Pre-apprenticeship programs are bridges into Registered Apprenticeship programs for those who do not meet the eligibility requirements for a Registered Apprenticeship program. They are typically short-term training programs that are recognized by the U.S. Department of Labor but are not registered.

Type of Program: Nationally administered program.

Eligibility and Targeting: The sponsor of a Registered Apprenticeship program identifies the minimum qualifications to apply. The eligible starting age can be no less than 16 years of age; individuals usually must be 18 years old to apprentice in hazardous occupations. Program sponsors may identify additional minimum qualifications and credentials to apply (e.g., education, physical ability to perform the essential functions of the occupation, proof of age). All applicants are required to meet the minimum qualifications. Based on the selection method used by the sponsor, there may be additional qualification standards, such as fair aptitude tests and interviews, school grades, and previous work experience.

Services/Program Support: Federal funding supports federal staff, located in state and local offices, who work directly with business and industry to develop programs that meet the skilled training needs of the employer/sponsor. Apprentices receive a mix of paid on-the-job learning, related technical instruction, and mentoring.

Non-federal Funds: There is no state matching requirement for this program. However, 27 states operate and fund State Apprenticeship Agencies recognized by the U.S. Department of Labor to register and oversee apprenticeship programs for federal purposes. Staff in these states develop Registered Apprenticeship programs and provide assistance to program sponsors.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Registered Apprenticeship programs include a mix of on-the-job experience and classroom training, allowing participating individuals to earn wages as they receive training and advance into jobs requiring higher skill levels. In effect, Registered Apprenticeship programs are career pathways. Pre-apprenticeship programs are very similar to career pathway bridges because they are designed to help individuals without the necessary prerequisites or skills to enter a Registered Apprenticeship program and gain the necessary education to begin such a program.

Through articulation agreements between Registered Apprenticeship program sponsors and the community and technical colleges with which they partner in the delivery of classroom training, many participants have the opportunity to simultaneously earn an associate's degree or substantial credit toward one. Through a Registered Apprenticeship program, young people considering a work-based approach to a career do not face the false choice of choosing between a career and an education.

Federal funding for Registered Apprenticeship supports federal staff who work with employers to sponsor programs and ensure they meet the federal, state, and industry requirements to be registered. Sponsors can be individual employers, employer associations, or labor-management partnerships. Funding for services such as training and case management can come from Apprenticeship sponsors, the Workforce Investment Act, foundation funds, state grants, or other funds. Mentoring is a critical, required component of a Registered Apprenticeship. Apprenticeship staff work with employers and training providers to define competencies for pre-apprenticeship programs that act as bridges into Registered Apprenticeship programs. Funds to develop pre-apprenticeship programs may come from the Apprenticeship sponsor, WIA, the training provider, or state or foundation grants.

Washington used WIA state discretionary funds to support some pre-apprenticeship programs as a bridge into Registered Apprenticeship programs.²¹ The state also

gives apprentices a 50 percent discount on community college tuition.²²

Wisconsin has expanded the use of apprenticeship and pre-apprenticeship programs as part of its Regional Industry Skills Education (RISE) initiative. The Wisconsin Department of Workforce Development is the lead on this initiative, which seeks to create a state policy environment in which career pathways, including bridges, can flourish. The department is holding joint WIA and Apprenticeship training for local WIA program staff and providing State Energy Grant-funded participation for eligible apprentices and journey workers in green construction and energy programs.

Registered Apprenticeship staff have deep connections to industry and can work to develop new apprenticeship programs as part of a pathway initiative. Apprenticeship programs also can be connected to community/technical colleges and college credit, which would promote integration with career pathways. While these connections are not widespread, some states and community colleges encourage collaboration.²³

In the **Wisconsin** Technical College System, apprenticeship-related instruction is considered an approved academic program. Apprentices can earn 39 credits toward a 60-credit journey-worker Associate of Applied Arts degree.

South Carolina has funded Apprenticeship Carolina™, a \$1 million per year initiative housed in the South Carolina Technical College System. Apprenticeship Carolina seeks to ensure that all employers in South Carolina have access to the information and technical assistance they need to create demand-driven Registered Apprenticeship programs. Apprenticeship consultants are available, at no charge to employers, to guide companies through the Registered Apprenticeship development process, from initial information to full recognition in the national Registered Apprenticeship System. In addition to the staff and marketing budget for the initiative, the state funds an employer tax credit of \$1,000 per year per apprentice for up to four years as an incentive.

PROGRAM LIMITATIONS

- Registered Apprenticeship training programs must meet standards that are agreed upon by industry.
- To be eligible for a Registered Apprenticeship program, an occupation must require a certain amount of on-the-job learning and related instruction, which may be provided by training centers, technical schools, community colleges or institutions offering online learning approaches.

OPPORTUNITIES FOR STATES

- Develop new Registered Apprenticeship programs that use a career pathway framework and are based on employer demand and the availability of qualified workers.
- Support the development and expansion of pre-apprenticeship programs as bridges into Registered Apprenticeships for adults and youth who traditionally have been unable to access these programs.
- Create closer connections between Registered Apprenticeship and the other programs that can support career pathway initiatives (e.g., WIA).²⁴
- Coordinate employer engagement activities between Registered Apprenticeship and career pathway initiatives.
- Include Registered Apprenticeship as part of the overall career pathways approach.
- Support the provision of academic credit for completing apprenticeship programs or components of programs in order to provide students with increased opportunities for college-level work.

Employment Service (Wagner-Peyser Act)

Overview: The Employment Service provides employment services and counseling to jobseekers and labor exchange services to jobseekers and employers.

Type of Program: Formula grants to states.

Eligibility and Targeting: Services are available to any individual jobseeker, regardless of employment status. Veterans receive priority, and disabled veterans receive the highest priority. States can provide specialized assistance to other targeted populations. Any employer seeking workers is eligible for employer services.

Services/Program Support: Services include job search and placement assistance for jobseekers, recruitment services and special technical services for employers, reemployment services for unemployment insurance claimants, labor exchange services for workers who have received notice of permanent or impending layoff, and the development and provision of labor market and occupational information. The Employment Service also administers the work test for Unemployment Insurance claimants.

Non-federal Funds: There is no state matching requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Employment Service staff can play an important role in guiding people toward jobs and toward education and training organized around career pathways through a range of one-on-one assistance and group services, including:

- Counseling and career planning,
- Testing and assessment,
- Job search assistance, and
- Recruitment, job matching, and placement.

Employment Service staff can help identify local employer partners, such as those that offer high-wage opportunities in established career pathways. The Employment Service typically works with employers to identify employment opportunities and match qualified jobseekers with openings.

The **Wisconsin** Department of Workforce Development has redirected resources to ensure that every local workforce area has at least one certified employment counselor to provide career counseling to clients. In Wisconsin, Comprehensive Job Centers house WIA services and programs as well as the Employment Service and vocational rehabilitation and veterans services, among other programs. This new policy, coupled with other changes made under the umbrella of the state's Regional Industry Skills Education (RISE) initiative, strengthens the use of public workforce resources for career pathway and career pathway bridge models. These policy changes include adding career pathway training models (e.g., apprenticeships, bridges, and chunked career pathways training in targeted occupations) to the state's Eligible Training Provider List and requiring all workforce development boards to incorporate RISE career pathway principles in their WIA local plans.

PROGRAM LIMITATIONS

- Employment Service resources that may be available to support career pathways are mostly staff and service resources, not financial resources to pay for education and training. For example, staff can provide employment services and offer intensive counseling services to people interested in career pathways. However, the program cannot support participants in education or occupational training.

OPPORTUNITIES FOR STATES

- Employment Service staff can provide counseling to guide people toward established career pathways.
- Online state job banks can help jobseekers learn about employment opportunities and employers in regional career pathways.
- Employment Service resources or staff may be used to analyze and disseminate labor market information on industries and occupations to help inform the development of career pathways.

Workforce Investment Act Title II: Adult Education and Family Literacy Act

Overview: The Adult Education and Family Literacy Act (AEFLA; Title II of the Workforce Investment Act) provides states with funding for a variety of services to help adults develop basic skills, such as reading, writing, math, English language competency, and problem solving. The adult education and English language services it supports can open doors to career pathway programs for those whose low skills or limited English might otherwise keep them out.

Type of Program: Formula grants to states and localities. States must distribute 82.5 percent of their federal allocation to local providers, with the balance allotted for state leadership activities (12.5 percent) and administrative expenses (5 percent). States must award local grants or contracts through a competitive process that provides “direct and equitable” access to federal adult education funds by all types of eligible program providers (e.g., school districts, community colleges, libraries, community-based organizations, and other public or private nonprofit entities).

Eligibility and Targeting: Eligibility is limited to adults who are at least 16 years of age and not currently enrolled, or required to be enrolled, in high school. In addition, they must lack a high school diploma or its equivalent, function below that level (even if the student has a high school diploma), or be unable to speak, read, or write the English language.

Services/Program Support: The Act has three purposes: assist adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency, help parents support their children’s learning, and help adults complete a high school education. The Act funds adult education and literacy services, including workplace literacy, family literacy programs, and English language services.

Non-federal Funds: States are required to provide a match using non-federal funds amounting to at least 25 percent of the total funds spent on adult education in the state. This match may be cash or in-kind.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Federal adult education law places a strong emphasis on preparation for employment and for postsecondary education and training, which fits well with career pathway and career pathway bridge approaches. For example, states must describe how adult education and literacy activities will be integrated with other adult education, career development, and employment and training activities. And one of three core indicators of performance is “placement in, retention in, or completion of, postsecond-

ary education, training, unsubsidized employment, or career advancement.”²⁵

Federal law provides substantial flexibility on how adult education funds can be used for eligible individuals and allowable services. When academic and English language services below the postsecondary level are provided to adults as part of career pathway and career pathway bridges, this can shorten the timeline to postsecondary credentials, improve transitions to further education, reduce costs, and decrease the need for developmen-

tal education.²⁶ Specifically, federal adult education funds can be used to:²⁷

- Support development of academic and English language components of career pathway and career pathway bridge programs, as long as the services are below the postsecondary level. This might include, for example, creating curricula that are contextualized to occupational pathways or seeding innovation of new delivery formats, such as dual enrollment or learning communities.
- Fund operational costs of academic and English language services below the postsecondary level in career pathways and career pathway bridges. For example, federal adult education funds could pay for an adult education instructor to teach the academic and English language portions of a bridge program that integrates basic skills and English language content with occupational training in a co-instruction format.²⁸
- Reward performance for achieving goals beyond what is traditionally expected, such as setting state goals for postsecondary transition and credential completion by adult education students (beyond the federal ones) or setting goals for reducing the need for developmental education among adult education students who enter college.
- Provide support services to promote persistence in and completion of adult education and transitions to postsecondary education and training or employment. This might include helping fund transition coordinators who connect students with the resources needed to overcome academic and personal challenges to success.

Washington's Integrated Basic Education and Skills Training (I-BEST) program delivers adult education and occupational training using teams of faculty from each education sector to advance students along pathways that carry college credit and result in recognized job credentials. I-BEST pilot programs were funded by WIA Title II state leadership funds, Carl D. Perkins Career and Technical Education Act state leadership dollars, and general state appropriations. Local I-BEST programs are currently supported through state and federal adult edu-

cation funds, student tuition, and an enhanced reimbursement rate of 1.75 per full-time equivalent student for I-BEST enrollments. This enhanced reimbursement rate helps offset the additional costs of the I-BEST model.

Wisconsin's Regional Industry Skills Education (RISE) initiative promotes adult career pathway development throughout the technical college and workforce development systems, including bridges that combine basic academic, English language, and occupational content. Students receive college credit toward an approved occupational program and benefit from contextualized instructional strategies (e.g., team teaching, labs, and simulations) and career development activities. Colleges are reconfiguring postsecondary programs in greatest demand by employers into stackable credentials, and they offer adult learners an increasing number of career pathway options. State adult education funds supported these bridges initially; the state is expanding them with additional state resources and federal adult funds. Colleges are also increasing their use of WIA Title II grant funds (which they receive as providers) for career pathway bridges. Wisconsin's career pathways are also supported by other sources of state and federal funds.

Illinois uses state and federal adult education funds for career pathway bridges that contextualize basic academic and English language skills to occupations in high-demand industry sectors. After piloting this bridge model, Illinois now is implementing it statewide and working to connect the bridges to the 16 career clusters defined under the federal Carl D. Perkins Career and Technical Education Act. The goal is to bridge the instructional gap between the initial skills of individuals and what they need to enter and succeed in postsecondary education and career path employment. State leadership funds are used to provide professional development and technical assistance to the providers of bridge programs to promote statewide consistency in the incorporation of the basic components into these models.

FEDERAL FUNDS TO STATES

State leadership funds (12.5 percent of funds) can be used to:

- Develop and disseminate curricula,

- Create new service models,
- Provide professional development,
- Benchmark and reward performance,
- Provide technical assistance or develop evaluation standards to support implementation,
- Provide incentives for program coordination and integration,
- Coordinate adult education with existing support services, such as transportation and child care, and
- Integrate literacy instruction with occupational skill training and promote linkages with employers.

States also can use WIA incentive funds, awarded for exceeding negotiated performance targets in WIA Titles I and II, to support innovative programs, such as career pathways and career pathway bridges.

FEDERAL FUNDS TO LOCAL PROVIDERS

Funds distributed to local providers must be used to establish or operate one or more programs that provide services or instruction in adult education and literacy services, including workplace literacy services, family literacy services, and English literacy programs. Local adult education or English language programs can partner with community colleges and vocational education providers to support the creation and implementation of career pathways and career pathway bridges. In addition, local providers can contextualize basic skills content and integrate basic skills with workforce education.

States and local programs must report adult education and English language student outcomes in the National Reporting System (NRS) for federally supported students enrolled in career pathways or career pathway bridges, just as they do for other adult education students receiving federally funded services. While the NRS reporting measures differ from those required of the workforce system in WIA Title I, the Office of Vocational and Adult Education shifted all NRS outcome measures to cohort-based measures in 2012. This shift supports alignment between adult education and the workforce system, which is critical for implementing career pathways and career pathway bridges.

PROGRAM LIMITATIONS

- Local providers must use federal adult education funds to provide adult education and literacy services, including workplace literacy services, family literacy services, or English literacy services. These services must be below the postsecondary level.
- States cannot commingle adult education funds with those from separate funding streams. However, they can use Title II funds in conjunction with other funds. For example, states can use Title II funds to support the basic skills and English language components of career pathway and career pathway bridge approaches.

OPPORTUNITIES FOR STATES

Given the flexibility of federal adult education funds and the competitive process for awarding local funds, states can use them strategically to support career pathways and career pathway bridges for lower-skilled adults and out-of-school youth. States can use these funds to:

- Contextualize academic content to specific occupations and career pathways,
- Dually or concurrently enroll students in adult education or English language services and postsecondary education and training, with the adult education funds covering the services below the postsecondary level, including the adult education/English language portion of the educational program, as well as related supports,
- Align curricula and assessments across adult education, postsecondary education, and job training programs,
- Create new delivery models (e.g., co-instruction and integrated academic and occupational curricula) for helping speed the progress of students through college and career pathways, and require local providers to adopt the most promising models through the required competitive grant process,
- Create incentives for local programs to focus on preparation for and success in postsecondary education by offering enhanced funding for career pathway bridge and transition models—as Washington has done with I-BEST—and by setting targets for local programs to improve the transition and success rates of adult education students in college and career pathways,

- Consider the ways in which state funds beyond the required state match, if accounted for separately, can be used to support career pathway and career pathway bridge efforts in even more flexible ways,
- Support meaningful and active cross-agency partnerships and collaboration, and
- Support professional development for new instructional methods (e.g., team teaching) that are commonly used in career pathway bridge programs.

Pell Grants

Overview: The federal Pell Grant Program, authorized by Title IV of the Higher Education Act, is the largest federal grant program supporting postsecondary education and training for low-income students. It distributes need-based awards through postsecondary institutions to help students with the costs of attendance, including both direct costs, such as tuition and fees, and indirect costs, such as living expenses.

Type of Program: Grants to individuals via the higher education institution they attend.

Eligibility and Targeting: Both students and educational programs must meet specific eligibility criteria. Pell Grants target lower-income students enrolled in programs that result in a certificate or degree.

Services/Program Support: For students enrolled in eligible postsecondary programs that lead to a certificate or degree, Pell Grant funding can cover tuition, fees, housing and food expenses, books and supplies, transportation, and child care. Pell Grants can cover up to a year of remedial coursework if the student has been admitted to an eligible program and the remediation is part of or required for that program.

Non-federal Funds: Pell Grants are wholly funded by the federal government. There is no state or institutional matching requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

States and local institutions have few, if any, opportunities to make policy that directly affects how Pell Grant funding is used because funding flows directly from the federal government to the student via the educational institution the recipient attends, and student and institutional eligibility standards are determined by federal law. However, states and institutions can adopt policies and practices that expand the number of students and educational programs that are eligible for student aid. Pell Grants can help ensure that lower-income students have access to career pathways. States and local institutions can raise awareness about the availability of Pell Grants to pay for tuition and other expenses related to participating in an eligible career pathway. States can work with postsecondary institutions to design career pathway and career pathway bridge offerings to make as many

components Pell-eligible as possible. If a component cannot be designed as Pell-eligible, states and postsecondary institutions should consider how to support it with complementary funds from other sources.

Students must meet individual eligibility criteria and be enrolled as a regular student in a certificate or degree program that itself meets Pell Grant eligibility criteria. A student is eligible for Pell Grants if he or she meets all of these conditions:

- The student demonstrates financial need.
- The student is a U.S. citizen or eligible non-citizen.
- The student has a high school diploma or its recognized equivalent (e.g., GED) or was homeschooled.²⁹ Prior to July 1, 2012, if a student did not have one of these credentials, he or she could demonstrate his or her “ability to benefit” from postsecondary education

in one of three ways: (1) pass an ability-to-benefit test; (2) complete six postsecondary credits in a degree or certificate program with a C average or better; or (3) through a state-established process. With the *Consolidated Appropriations Act 2012*, Congress eliminated aid eligibility for students without a high school credential or its equivalent. However, some students are “grandfathered”: a student who was enrolled in an eligible program prior to July 1, 2012, can use the “ability to benefit” provisions to establish aid eligibility (assuming he or she meets all other eligibility requirements).³⁰

- The student has resolved any issues related to drug convictions.³¹
- The student is not in default on a federal student loan and does not owe the institution or the federal government for an overpayment of student aid (if the student has made a repayment arrangement for the default or overpayment, he or she may be eligible for aid).
- The student maintains “satisfactory progress,” which requires students maintain a minimum grade point average and complete a certain percentage of courses attempted each semester. In addition, maintaining satisfactory progress requires achieving the number of credits needed to earn a postsecondary certificate or degree program within 150 percent of the time normally required for completion (e.g., three years for a two-year associate’s degree program, which is prorated for part-time attendance).
- The student has not completed the requirements for or received a bachelor’s or professional degree.

A student’s Pell Grant amount primarily is determined by the student’s expected family contribution, which depends on student and family earnings (the formula is: Pell Grant Award = Total Maximum Pell Grant minus Expected Family Contribution; in some cases, the amount may be determined by the cost of attending the institution).³² The maximum Pell Grant award for a full-time student for the full academic year 2012-13 (7/1/12-6/30/13) is \$5,550. Awards are prorated based on enrollment status and the length of the period of attendance. The average new award in 2010-11 was \$3,800. Pell Grant recipients typically come from very low-income families: 74 percent of recipients in 2011 had household

incomes under \$30,000 (and more than half came from families with income under \$20,000).³³

Certificate and degree programs are generally eligible for Pell Grants if the program meets all of these criteria:

- The program is offered by an eligible public or private nonprofit institution of higher education or proprietary or postsecondary vocational institution. This generally means that the institution has legal approval from the state and is accredited or meets an alternative to accreditation standard, as well as certain other requirements.
- The program is a degree or certificate program at least one year long, resulting in gainful employment or, for certificate programs shorter than one year, is on the institution’s list of federally approved non-degree programs (the Eligibility and Certification Approval Report or ECAR). To be eligible for Pell Grants, these shorter certificate programs must be at least 600 clock hours, 16 semester or trimester hours, or 24 quarter hours long and offered over at least 15 weeks of instruction.³⁴
- The program is accredited and approved by the state (unless the accrediting agency or state does not regulate that type of program).

Some states and institutions have sought to ensure that students can earn “milestone credentials” within career pathway programs that are eligible for Pell Grants. For example:

In **Indiana**, Ivy Tech Community College has made a concerted effort to make shorter-term (less than one year) technical certificates eligible for student financial aid. It has received approval for 59 certificate programs. In addition to designing programs according to the eligibility guidelines, Ivy Tech had to gain approval from its accreditation body (the Higher Learning Commission), the Indiana Commission for Higher Education, and the U.S. Department of Education. Each certificate program is composed of courses that are also part of an associate’s degree program, so students can gain credit toward an associate’s degree if they choose to continue their education. Ivy Tech Community College is one of the

few community colleges to focus on gaining approval for numerous shorter-term technical certificate programs.

The **Arkansas** Career Pathways Initiative (CPI) has four key components: clear pathways of continuing education and employment, innovative instructional strategies aimed at improving student retention and completion, comprehensive student support services, and strategic partnerships.³⁵ The CPI is funded primarily through the state's Temporary Assistance for Needy Families program. However, program staff help participants apply for Pell Grants and other student aid to augment CPI funds. (Students use financial aid funds to cover tuition, fees, and other costs of attending before accessing CPI funds.)

Since 2004, **Oregon's** Career Pathways Statewide Initiative has aimed to “transform Oregon’s education systems to focus on helping youth and adults attain degrees, certificates, and credentials that lead to demand occupations, increased wage gain, and lifelong learning.”³⁶ Oregon’s 17 community colleges, in partnership with the state’s high school Career & Technical Education Network, the Oregon University System, the Employment Department, and Workforce Investment Boards, have created over 150 Career Pathways Certificates. Community college financial aid directors have approved financial aid guidelines for Career Pathway Certificates. In general, Career Pathway, Less Than One Year (LTOY), and other stand alone 12- to 44-credit certificate programs are not eligible for student aid. (The Oregon Initiative operates on a quarter-based hour system, not a semester-based hour system.) However, Career Pathway Certificates and LTOY Certificates are considered “momentum points” in student progression toward the aid-eligible course of study. Students who are enrolled in a course of study that is eligible for financial aid, such as an associate’s degree, can also earn a Career Pathway Certificate, LTOY, or other standalone certificate as they complete the required coursework on the way to attaining aid-eligible credentials or degrees.³⁷

PROGRAM LIMITATIONS

Pell Grants can cover a wide range of expenses related to postsecondary education and training. However, there are limitations:

- Students must meet all eligibility criteria described above.
- Educational programs must meet all eligibility criteria described above.
- Postsecondary institutions must be eligible to distribute federal Title IV student financial aid.
- Students convicted of drug-related crimes while receiving student aid or who have defaulted on federal student loans can be temporarily or permanently disqualified from receiving Pell Grants.
- Although students can theoretically apply for financial aid at any time, it is generally applied for and distributed in semester-based cycles (based on terms or other payment periods for clock-hour and non-term-credit-hour programs). It can take several weeks from the time of application for a student to begin receiving aid, so students and programs must plan ahead.
- Students cannot receive Pell Grant awards for more than 12 semesters or its equivalent.³⁸ This is prorated for part-time students.
- Remedial courses are Pell-eligible only if the student is accepted into an eligible program and takes remedial coursework within that program. Up to one academic year’s worth of these courses can be counted in the student’s enrollment status for federal aid. For the purpose of this limit, that is 30 semester or trimester hours, 45 quarter hours, or 900 clock hours. English as a Second Language courses do not count against the one-year limitation on remedial coursework, and they need not be at the secondary school level.

OPPORTUNITIES FOR STATES

- Work with financial aid administrators to structure career pathways and career pathway bridges so these programs are eligible for Pell Grants. Pay particular attention to program length and intensity. Students can receive student aid as they earn *interim* credentials that are too short to qualify for student aid on their own as long as the student is enrolled in and intends to complete a longer-term, aid-eligible program within which the interim credentials are embedded.
- Ensure that low-income students seeking to enroll in credit-bearing career pathway programs apply for Pell

Grants to cover tuition and other expenses. Assess how much Pell Grant funding can be expected for career pathways.

- Provide state leadership in helping colleges coordinate multiple funding streams and sources of student aid (e.g., Pell Grants, WIA Title I funding, TANF dollars) in order to offer more comprehensive funding packages to help students cover the entire cost of attendance, including tuition and fees, living expenses, and student supports, such as child care and transportation.
- Maximize federal need-based financial aid in conjunction with state aid programs.
- Provide state leadership in helping colleges be more assertive in gaining aid eligibility for qualifying shorter-term certificate programs.
- Provide professional development for college financial aid officers, faculty, and staff.

Carl D. Perkins Career and Technical Education Act

Overview: The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) supports secondary and postsecondary programs that build the academic, career, and technical skills of young people and adults. Perkins IV funds can be used to support critical components of career pathways initiatives, including curriculum development, program development, and support services. Federal funding is distributed through Title I of Perkins IV, which supports career and technical education (CTE) activities for both youth and adults. Funding for Title II of Perkins IV, which supports Tech Prep, was eliminated in 2011.

Type of Program: Formula grants to states, with state flexibility to determine the allocation of funds between secondary and postsecondary institutions. States must direct at least 85 percent of the funds to secondary and postsecondary institutions, which may include area career and technical education schools, technical colleges, and community colleges. The remaining 15 percent can fund state administrative and leadership activities.

Eligibility and Targeting: Institutions receiving Perkins IV funds must ensure access for special populations who face difficulty in attaining education and employment. Under the 2006 Act, special populations are defined as:

- Individuals with disabilities,
- Individuals from economically disadvantaged families, including foster children,
- Individuals preparing for nontraditional fields,
- Single parents, including single pregnant women,
- Displaced homemakers, and
- Individuals with limited English proficiency.

Services/Program Support: Perkins IV funds can be used to develop CTE programs and curricula, including a multiyear sequence of courses known as a program of study, develop programs for special populations, provide mentoring and support services for CTE participants, upgrade or adapt equipment designed to strengthen academic and technical skill achievement, and provide professional development opportunities to teachers, administrators, and counselors.

Non-federal Funds: States must maintain non-federal spending on career and technical education at the same level as in prior years. States also must match funds spent on state administrative (but not state leadership) activities, using non-federal sources.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Perkins IV can support key components of career pathway initiatives and can be used to drive development of new pathways that lead to jobs in vital economic sectors. Funds also can be used for the initial development and support of the CTE components of career pathway bridge initiatives, typically in coordination with other funding sources.

The 2006 reauthorization of the legislation requires local recipients of funds to offer at least one program of study as an essential part of their CTE offerings. A program of study is a multiyear sequence of courses, similar to a well-defined career pathway, in a career and technical content area. The sequence:

- Must include academic and CTE content in a non-duplicative progression of courses,
- Must combine secondary and postsecondary program elements,
- May allow for dual or concurrent enrollment in a postsecondary program, and
- Must lead to an industry-recognized credential or certificate at the postsecondary level or to an associate's or bachelor's degree.

Programs of study can be thought of as career pathways intended to move secondary students toward a postsecondary credential and/or the baccalaureate level. A program of study can be structured in different ways (e.g., as a component of a career cluster, a career academy, or a small learning community) and can have multiple entry points, including opportunities for adult learners.

Resources reserved as state leadership funds (10 percent of the total allocation) are required to fund selected activities, which include developing, improving, or expanding the use of technology in CTE; supporting partnerships among local institutions, adult education providers, and other entities; and providing professional development opportunities for CTE teachers and faculty. In addition to these required activities, allowable uses of these funds include supporting new CTE courses and initiatives, improving career guidance and academic

counseling, and developing and enhancing data systems so that states and institutions can track academic and employment outcomes for CTE students.

Perkins IV funds distributed to local institutions (85 percent of the total allocation) must be used for a range of activities, including the provision of activities that prepare special populations for high-skill, high-wage, or high-demand occupations; the development of quality CTE programs; and the enhanced use of technology in CTE programs. Local recipients may use funds for critical implementation activities, such as providing mentoring and support services, expanding flexible delivery formats to make CTE accessible to all students, and developing or improving CTE courses. Perkins IV funds also may be used to provide direct assistance, including dependent care, transportation, tuition, books, and supplies, if the assistance is delivered to members of special populations who need it to participate in CTE activities, if it is part of a larger set of strategies for special populations, and if it supplements what is otherwise available from non-federal sources.³⁹

In **Washington**, Perkins leadership funds, along with Adult Basic Education funds, were instrumental in the development of I-BEST, a career pathway program for low-skilled and limited-English-proficient adults that contextualizes and integrates basic skills education with occupational training and results in college credit and an occupational certificate. Leadership funds supported 10 I-BEST demonstration projects in 2004-2006 and have been used over the years to support I-BEST professional development opportunities. In addition, the state has established expectations for all Perkins programs that include meeting the unique needs of adult learners by ensuring that course requirements and necessary skill sets required for obtaining entry into the workforce are well defined and understood.

Ohio's new five-year plan for Perkins IV includes the shift of 3 percent of Perkins Title I funding from secondary and postsecondary institutions to support activities geared toward supporting student success and improving a student's likelihood of earning a credential. The state intends for institutions to use this funding to identify

learning needs and provide appropriate interventions for students vulnerable to dropping out of high school and students who need assistance reentering the education system.

In **Illinois**, Lake Land College pioneered a unique partnership involving developmental education and occupational programs. An instructor developed a transportation bridge course that helps students who test into developmental reading and writing succeed in the college's for-credit, transportation certificate, and degree programs. Students concurrently enroll in this bridge course and the transportation occupational programs (e.g., automotive technology, agriculture power technology). The bridge course covers an introduction to the workplace, technical reading applications, industry certification expectations, reading requirement goals, and the use of work-based scenarios to practice appropriate listening, reading, and communication skills. The college's efforts were supported by the Illinois Shifting Gears Initiative.⁴⁰

PROGRAM LIMITATIONS

- Although federal dollars may be used for the delivery of prerequisite courses, the 2006 legislation excludes funding for prerequisite courses that are remedial. Any course funded under Perkins IV also must meet all parts of the new definition of CTE.
- Although Perkins IV funds may be used to support the CTE component of a career pathway bridge initiative, additional federal, state, and local resources, such as adult education and literacy funds, must be used to provide basic skills instruction and other elements of the career pathway bridge initiative.

OPPORTUNITIES FOR STATES

The flexibility under Perkins IV provides ample opportunities for states to create or expand career pathway and career pathway bridge initiatives, including:

- Align programs of study and overarching career clusters with the workforce and skill needs of regional employers.
- Use program approval authority to drive the development of programs of study and ensure access to the program for adults as well as young people.

- Collect outcome data for adults participating in CTE programs to track transitions to further education and training and into the labor market.
- In conjunction with other federal and state funds, use state leadership funds to initiate career pathway bridge initiatives.
- Use the authority under the reserve (which may consist of up to 10 percent of funds that are distributed to local institutions) to award grants to secondary and postsecondary institutions.
- Support partnerships involving local schools, postsecondary institutions, and adult education providers to focus on successful transitions, leading to the attainment of academic, career, and technical skills.

Temporary Assistance for Needy Families

Overview: Temporary Assistance for Needy Families is more than a cash assistance program. It is a block grant providing flexible funding to states to support a wide range of activities. Almost all components of career pathway strategies can be reasonably justified as promoting the second statutory purpose of TANF, which is to “end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.”

Type of Program: Block grants to states.

Eligibility and Targeting: Most benefits and services are limited to low-income families with children. States set the income criteria, which may vary for different services. Some activities aimed at preventing out-of-wedlock pregnancy and at promoting marriage are not restricted to such families.

Services/Program Support: TANF is a flexible funding stream that may be used in any way reasonably aimed at achieving one of the purposes of TANF, with few restrictions.

Non-federal Funds: States must continue to spend at least 75 percent of what they spent on Aid to Families with Dependent Children and related programs prior to the creation of TANF (or 80 percent, if they fail to meet the TANF work-participation requirements). This is known as the “maintenance of effort” (MOE) requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

TANF and maintenance-of-effort funds can be used for a wide variety of activities, including career pathway partnership and curricula development, the ongoing costs of providing education and training, and ongoing supportive services. Such services are not limited to recipients of cash assistance under TANF. The activities should be included in the TANF state plan, and the TANF support must be proportionate to career pathways participation by TANF recipients and/or other needy families with children. Federal approval from the Department of Health and Human Services (HHS) is not needed.

TANF places restrictions on what activities can be counted toward the federal participation rate for recipients of TANF assistance.

- Participation in a career pathway program can reasonably be counted as either “vocational educational training” or “job skills training directly related to employment.”
- Basic education can only be counted as vocational educational training if it is a “necessary and regular part” of a vocational program. In the final rule implementing changes made by the Deficit Reduction Act of 2005, HHS explicitly rejected suggestions that a sequence of activities including intensive stand-alone basic education leading to a vocational program should be countable.
- Vocational educational training can count for all hours of a recipient’s participation requirement, but it can only be counted for 12 months per recipient, and there is a limit on the share of the caseload that can be counted based on this activity.

- Job skills training is only countable when combined with 20 hours per week of a “core activity,” such as subsidized or unsubsidized employment.

To allow TANF recipients to participate in a career pathway program, states may want to consider allowing recipients to participate in educational activities even when they are not countable toward the federal requirements or developing work-study programs and other ways for recipients to combine work and education in a way that supports career pathways participation.

Arkansas has invested approximately \$90 million in federal TANF funds since 2005 to help low-income parents earn credentials in career pathways at two-year colleges across the state. The Arkansas Career Pathways Initiative provides a network of case managers at 25 campuses who help low-income parents persist in their studies. TANF funds also help defray a range of expenses related to parents’ participation, including the costs of tuition, child care, transportation, and other student support services.

Kentucky’s \$10.8 million Ready to Work (RTW) initiative helps TANF recipients succeed in community and technical college programs while helping the state meet its TANF work-participation rate. In addition to getting help from college-based RTW coordinators at 16 colleges, students can earn additional income and gain work experience in TANF-funded work-study jobs. For those jobs, students can be placed in on-campus or off-campus work at either public- or private-sector places of employment. These work-study jobs also enable recipients to meet the core 20-hour-a-week federal work participation requirements, even after they reach the 12-month limit on vocational educational training.

PROGRAM LIMITATIONS

- Participants must be members of “needy families,” meaning they must be in families with children and be low-income (although the state may set the income criteria, which can be higher than those established for cash assistance).
- TANF funds may not be used to support generally available public education.

- Under TANF, states must meet a federal work-participation rate with regard to recipients of TANF assistance. In most cases, funding career pathways programs will not trigger this requirement. However, transportation and child care provided to non-employed adults is considered to be “assistance.” If the families are not receiving cash benefits, this can trigger time-limit, participation-rate, and data-reporting requirements.
- TANF is a fixed block grant, and the allocations have not been adjusted for inflation since 1996. This is the main barrier to the use of TANF funds to support career pathways. Due to the loss of the TANF Supplemental Grants and the expiration of the temporary TANF Emergency Fund, many states now receive less TANF funding than in recent years. As most states have committed their allotments to other activities, increasing spending in one area often requires cuts in other areas.

OPPORTUNITIES FOR STATES

- TANF is a flexible source of funds that can be used to support career pathways activities. States should examine their current spending under TANF to see whether unobligated funds are available or if some existing activities would be supported more appropriately with other sources of funds.⁴¹
- State funds spent on career pathways may be countable toward the TANF maintenance-of-effort requirement, to the extent that they benefit needy families and represent new spending (compared to 1995 levels). “Excess” MOE spending beyond the amount required may be used to reduce the effective work-participation-rate requirement.
- States should consider strategies to expand access to education and training for TANF recipients. One key policy is to allow participation in educational activities to count toward state requirements (even when not countable toward the federal rate). States should define the countable activities (vocational education, job skills training, and education related to employment) to include career pathways components and should develop work-study programs and other ways for recipients to combine work and education.

Supplemental Nutrition Assistance Program Employment and Training

Overview: Supplemental Nutritional Assistance Program Employment and Training (SNAP E&T; formerly known as Food Stamps Employment and Training or FSET) funds can be used to support a variety of education, training, employment, and related services for SNAP recipients. Federal administration of the SNAP E&T program is housed within the Food and Nutrition Service of the U.S. Department of Agriculture.

Type of Program: Grants to states and federal reimbursement to states. The SNAP E&T program includes two main types of funding: 100 percent federal funds and 50 percent federal reimbursement funds.

Under the first type of funding, each state receives a capped allotment of 100 percent federal funds to provide SNAP E&T services (other than participant reimbursements). This allotment is very low compared to the total number of potentially eligible SNAP recipients. In many states, it is entirely consumed by job search activities and referrals to education and training that are funded from other sources. States can also qualify for additional 100 percent federal funds if they commit to serving all unemployed childless adults who would otherwise be at risk of losing SNAP benefits due to the time limit.

Under the second type of funding, states can claim 50 percent reimbursement for non-federal spending on SNAP E&T activities. This is not capped. To draw down these funds, states must include a description of these activities and a proposed budget in a SNAP E&T plan. The Food and Nutrition Service must approve the plan.

Eligibility and Targeting: Participants must be recipients of SNAP benefits and not Temporary Assistance for Needy Families recipients. In general, SNAP recipients must have gross monthly incomes under 130 percent of the federal poverty level and have assets under defined limits. In some states, services further target “able-bodied adults without dependents” who are at risk of losing SNAP eligibility if they are not participating in a work-related activity. Some states impose additional criteria, such as targeting certain regions.

Services/Program Support: SNAP E&T funds can support operating costs of education and training programs, support services for participants, and job retention services for up to 90 days.

Non-federal Funds: States receive a limited allotment of 100 percent federal funds and must provide a match to receive the 50 percent federal reimbursement funds. Third-party expenditures may be claimed as state spending for this purpose, contingent upon approval by the Food and Nutrition Service.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

SNAP E&T supports education and training activities for SNAP (Food Stamp) recipients and is quite flexible regarding the types of programs. SNAP E&T can pay for the costs of operating education and training programs, including basic skills instruction, as long as the program or service is not available to the participant at no cost through another government program or private source. The federal government will share half the cost of reimbursing recipients for a wide range of expenses related to participation in a SNAP E&T component, such as the costs of dependent care, transportation, uniforms, books, safety equipment, interview clothing, test fees, and supplies. In a provision added by the Food, Conservation and Energy Act of 2008 (P.L. 110- 234), SNAP E&T funds also can be used to provide job retention services for up to 90 days after an individual who received employment and training services under SNAP E&T gains employment.

In the past, states mostly claimed reimbursement for direct state and local expenditures under the 50 percent reimbursement funding stream. In recent years, a number of states have developed processes to claim expenses incurred by community colleges and other not-for-profit organizations under contract to the state agency operating SNAP E&T. These are sometimes referred to as “third-party match” programs.

Washington has operated a third-party match SNAP E&T program called Basic Food Employment and Training (BFET) since 2005. The program includes partnerships between community colleges and community-based organizations (CBOs) that provide participants with support services. The non-federal funds spent on support services for SNAP E&T students by CBOs are allowable expenses to claim the federal 50 percent reimbursement. Expenses claimed by community colleges for the SNAP E&T 50 percent reimbursement can include tuition, mandatory student fees, books, and specific administrative costs associated with running BFET, as long as these charges are consistently applied to other grants or charged to the general public. The Food and Nutri-

tion Service does not allow reimbursement for expenses above and beyond what the general public or other grants pay (e.g., state funding to community colleges for instruction is not an allowable reimbursement expense.)

In Fresno, **California**, the Fresno Bridge Academy, a program of the nonprofit Reading and Beyond, accesses SNAP E&T resources to help eligible unemployed and underemployed adults become job-ready and assists them with job searches. Individuals work one on one with a case manager in an 18-month program that supports them through developing individual goals, offering workshops on soft skills such as resume writing and interviewing, and providing wraparound services that assist with needs that affect their success in the workforce (e.g., transportation). Foundation funding supplements services that are not funded by SNAP E&T resources. The Bridge Academy partners with local schools to provide vocational training for participants. Bridge Academy participants can enroll in various training programs (e.g., medical assistance, administrative, manufacturing) to receive their certifications in a period of 8-18 months, after which case managers help to place them in jobs.

PROGRAM LIMITATIONS

- Historically, SNAP E&T programs have been designed primarily to provide an activity for participants who were unemployed and mandated to participate in a SNAP E&T program to maintain food stamp benefits. These programs have not necessarily been robust education and training offerings.
- Participants must be assessed for appropriateness and enrolled in SNAP E&T programs to receive services and be counted toward the reimbursement. They cannot be assumed to be eligible for services based on SNAP receipt. SNAP E&T funds cannot be used to provide services to individuals receiving TANF cash assistance.
- Federal grant programs, including the SNAP E&T program, cannot be charged more for services than the general public pays. Therefore, when states are considering which expenses to claim for the 50 percent reimbursement, they must ensure that these

claimed expenses are consistent with what the public pays or what is charged to other federal, state, or local grants. Student tuition, mandatory student fees, case management, course books, transportation, and child care are generally considered allowable expenses. It is not allowable to claim the amount of funding a state provides to an institution.

- There is no statutory or regulatory limit on how long a SNAP E&T component may last, but it is clear that the Department of Agriculture thinks of the program as providing short-term skills training for unemployed individuals. However, P.L. 110-234 clarified that individuals may volunteer to participate for more than 30 hours a week. This flexibility allows SNAP E&T funds to be used for more robust education and training activities for individuals who are employed in low-wage jobs.
- The Food and Nutrition Service has shown some concern about the increasing requests for reimbursements from states, and it has rejected some of the plans submitted by states, arguing that the services were too similar to those available for free or at lower cost to the general public, or that the state had not justified the proposed increase in spending.

OPPORTUNITIES FOR STATES

- The 50 percent reimbursement stream can be a significant, flexible source of federal funding. States are reevaluating the types of supports they would like to provide under these programs, and a few are offering more robust education and training offerings.
- Because SNAP E&T allows states to serve low-income individuals who do not have children, SNAP E&T funds can be a valuable complement where TANF funds are used to provide services to low-income families with children.

Appendix: Federal Funding for Support Services

This appendix provides additional information on how a wide variety of federal sources can be used to fund support services for participants in career pathway and career pathway bridge initiatives. Adequately funding these services emerged as a significant challenge as states began to use **Funding Career Pathways and Career Pathway Bridges** as a tool for braiding funding. It provides additional guidance to help interagency state teams identify and use federal resources to fund the support services components of career pathway and career pathway bridge programs. State teams can use this appendix to:

- Understand the types of support services that are important for participants in career pathways and bridges,
- Identify how federal resources can support these key components and tasks, and
- Pinpoint state policy changes or other state actions needed to maximize federal funding opportunities for support services.

Highlighted in this section are four categories of support services and a matrix outlining the potential use of ten federal programs for support services. To explore opportunities more fully for funding these services using federal funds, it includes three federal programs that are not profiled in the toolkit itself.⁴²

The 10 federal programs included in this appendix are:

- Workforce Investment Act, Title I (Adult and Dislocated Worker),
- Workforce Investment Act, Title I (Youth),
- Workforce Investment Act, Title II (Adult Education and Family Literacy Act),

- Pell Grants,
- Carl D. Perkins Career and Technical Education (Perkins CTE),
- TRIO, Student Support Services Program (TRIO SSS),
- Temporary Assistance for Needy Families (TANF),
- Community Services Block Grant (CSBG),
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), and
- Community Development Block Grant (CDBG).

Support services are defined as the range of supports that should be available to students to help them persist in and complete career pathway and career pathway bridge programs.

THE OPPORTUNITIES OF FULLY INTEGRATING SUPPORT SERVICES

Federal programs provide critical funding to help states, and education and training providers offer the support services necessary for nontraditional students to persist in and complete their programs of study. To use federal resources most effectively, states and local providers should:

- **Take an entrepreneurial approach to finding resources for support services and for providing these services.** This includes seeking and securing philanthropic and other private funds for support services; engaging in unique partnerships to provide these services (e.g., with AmeriCorps, civic organizations, and libraries); and considering technology solutions (e.g., through online career explorers and navigators). Supplementing public funding for support services with these atypical resources and partnerships can stretch limited public dollars.
- **Braid together funding sources to provide support services.** Because of limits on how funds may be used, programs with a diverse customer base may need to braid funding from different streams in order to provide the full range of needed services. Some programs have found that they need a dedicated staff member or a reliable partner who can organize and blend these streams into a cohesive funding scheme while meeting the specific requirements of each program. Dedicating staff to braid funding, including assembling, managing and accounting for public funds, can be challenging if programs are already understaffed.⁴³
- **Form partnerships to bring together resources necessary for providing support services.** Many partners in career pathway efforts or potential partners in the community offer or have the capacity to offer some support services. Community-based organizations, one-stop career centers, and human services agencies may already provide case management and financial assistance for child care, transportation, or other expenses to participants. Community colleges and other postsecondary education entities may pro-

vide academic advising and other academic supports. Many of these partners, as well as employers, can assist with finding jobs or arranging internships for participants. The key is to organize these resources into a cohesive plan that draws on the strengths of all relevant partners.⁴⁴

Support services frequently are underfunded components of career pathways and may be seen as add-ons rather than as vital supports necessary for students to persist in their coursework and complete their programs of study.⁴⁵ Though many support services are allowable activities of federal programs, a lack of funding and misaligned accountability systems may lead program administrators to use scarce funds for other priorities.

CATEGORIES OF SUPPORT SERVICES

This appendix describes four types of support services:

- Financial stability support,
- Personal support,
- Academic support, and
- Career preparation support.

These categories encompass a full range of supports that should be available to students to help them persist in and complete career pathway and career pathway bridge programs. Depending on their individual circumstances, income, and other indicators of eligibility, students may benefit from services in only one category or multiple categories.

Financial Stability Support includes financial support that falls outside the traditional system of financial aid. The purpose of this support is to ensure that students can meet the financial demands of participating in career pathway and career pathway bridge programs. The cost of participation in these programs can be much more than the amount adults and youth pay in tuition and fees. Books and other training and educational expenses increase the cost to participants, and the opportunity cost of spending time in training rather than working is significant. Student parents often must pay for child care in order to attend training. In addition, they must continue to meet basic living expenses—rent, utilities, food, transportation, and

health care—for themselves and often for their families. In some cases, career pathway participants experience unexpected financial emergencies, such as a car that requires repair.⁴⁶ For low-income individuals, these issues can serve as roadblocks to completing career pathway programs.

One strategy for improving students' financial stability is to help them secure public support. Low-income students frequently qualify for federal programs designed to assist low-income individuals. These programs can increase financial support for adults and youth and help them care for their families, and they may help them reduce their work hours while enrolled in training. Financial assistance may include, but is not limited to, food

assistance through the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and the free and reduced-price school lunch program for children; cash assistance through Temporary Assistance for Needy Families (TANF) and state general assistance programs; subsidized health insurance, most frequently through Medicaid or the Children's Health Insurance Program (CHIP); and housing assistance through the Section 8 Program and other housing programs.

The table below shows the range of financial stability support that should be available to participants in career pathway and bridge programs.

CATEGORIES OF FINANCIAL STABILITY SUPPORT	DEFINITIONS
Assistance accessing traditional financial aid	Information about and assistance obtaining various sources of financial aid, including federal and state grants, such as federal Pell Grants, as well as information about student loans
Assistance using nontraditional sources of aid to pay for education and training	Assistance accessing and paying for the direct costs of training and education, such as tuition, books, and fees, from sources other than traditional financial aid. These may include private or institutional scholarships, TANF, or federal programs that offer individual tuition support.
Funding for child care and transportation	Assistance with paying for or providing child care and transportation services for students
Funding for living expenses ⁴⁷	Assistance with meeting living expenses, such as rent, utilities, food, and health care, for participants and their families

Personal Support assists participants in addressing non-financial, nonacademic barriers to academic progress, so that they can engage fully in their learning. These supports address the challenges that arise as students balance the demands of participation in training, work, and family. If these services are not available at the community organization or college campus, students may have to be referred to off-site services.

Personal support has implications for the financial stability of program participants. For example, for a student who lacks access to affordable health care, accessing

counseling to address a mental health issue could quickly become a financial crisis. Additionally, an individual who does not have the knowledge or skills to manage debt, follow a budget, and plan financially for the future is likely to experience challenges meeting financial responsibilities. Effective financial coaching and education could mitigate these challenges.

The table that follows shows the range of personal support that may be available to participants in career pathway and bridge programs.

CATEGORIES OF PERSONAL SUPPORT	DEFINITIONS
Mentoring	One-on-one relationships between participants and experienced adults who can provide help and advice about navigating academic and employment challenges
Case management	One-on-one assistance to participants meant to optimize financial, personal, and academic outcomes through needs assessment, resource identification, referrals, and service facilitation
Mental health, substance abuse, or other counseling	Counseling for domestic violence, mental health, substance abuse and other personal obstacles
Group support (group counseling, learning communities, cohort support)	Use of groups to support participants, often with similar characteristics, such as student parents, first-generation students, and disadvantaged students. This may include group counseling and learning communities that are designed to provide peer-to-peer support to cohorts of students.
Financial coaching/financial literacy workshops	Assistance with budgeting, financial goal setting, saving, accessing financial products, building assets, understanding financial opportunities and consequences, and strategies for improving an individual's financial situation

Academic Support helps participants meet the academic requirements of career pathway and career pathway bridge programs. Many adults and youth enter career pathways unprepared to complete the academic work or fail to understand what is required of them. They may be the first in their family to attend such a program, or they may be returning to education and training many years after finishing high school. These supports help students

plan for a program of study and its requirements and provide them with the study skills and course support needed to succeed.

The table below shows the types of academic support that can help students persist in and complete their programs of study.

CATEGORIES OF ACADEMIC SUPPORT	DEFINITIONS
Tutoring	Individual or group assistance with course concepts, completing assignments, or remedial work
Academic advising (e.g., course planning)	Information and guidance on planning a course of study and selecting courses and instructors
Academic preparation and course support (e.g., study skills)	Preparation of students to meet program expectations; includes teaching study skills and how to access college and community resources.

Career Preparation helps participants use the knowledge and skills they acquire in their training to plan for a career pathway and secure employment. Students identify their interests, explore careers, and develop plans. They also may need assistance with securing an

internship or other work-based learning opportunity while they are enrolled and then assistance with finding a job at the end of the program.

The table below describes three types of career preparation.

CATEGORIES OF CAREER PREPARATION	DEFINITIONS
Career navigation	Assistance understanding job and career information, assessing career interests, exploring career options, understanding various steps in a selected career, and developing career plans
Job search assistance and placement	Assistance with preparing a resume, preparing for interviews, understanding the job market and recent trends, understanding the job search process, identifying employment opportunities, and getting placed into jobs
Assistance gaining work experience, searching for an internship, and getting a placement	Developing or identifying work experiences (e.g., summer employment opportunities, internships related to the course of study, and work-study placements) and getting placed into jobs

The matrix on the following page is a guide to the support services that can be funded by ten federal programs administered by five federal departments:

The U.S. Department of Labor

- Workforce Investment Act (WIA), Title I (Adults and Dislocated Worker)
- Workforce Investment Act, Title I (Youth)

The U.S. Department of Education

- Workforce Investment Act, Title II (Adult Education and Family Literacy Act)
- Pell Grants
- Carl D. Perkins Career and Technical Education (Perkins CTE)
- TRIO, Student Support Services Program (TRIO SSS)

The U.S. Department of Health and Human Services

- Temporary Assistance for Needy Families (TANF)
- Community Services Block Grant (CSBG)

The U.S. Department of Agriculture

- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

The U.S. Department of Housing and Urban Development

- Community Development Block Grant (CDBG)

A solid circle on the matrix indicates that a funding source is generally or commonly used to provide the support to eligible participants. A hollow circle indicates that a funding source can be used to provide the support, but it may not be used widely as a result of limited funding, program eligibility requirements, or other reasons. Federal funding for most of the programs profiled in this appendix does not go directly to an individual; rather, it flows to states, cities, educational institutions, or local programs, which can provide the support directly to the participant or pay for the support on behalf of the participant. State teams should use the matrix in conjunction with the lengthier descriptions of most of the programs in the body of this toolkit, along with the notes following the matrix, which provide information on program-specific eligibility requirements, allowable activities, and other limitations.

Federal Funding for Support Services in Career Pathway and Bridge Programs

PROGRAM	FINANCIAL STABILITY SUPPORT	PERSONAL SUPPORT	ACADEMIC SUPPORT	CAREER TRANSITION
	Assistance accessing traditional financial aid			internship search, and placement assistance gaining work experience,
	Assistance using nontraditional sources of aid to pay for education and training		job search and placement	
	Funding for child care and transportation		Career navigation	
	Funding for living expenses		Academic preparation and course support (e.g., study skills)	
	Mental health, substance abuse or other counseling		Academic advising (e.g., course planning)	
	Case management		Tutoring	
	Mentoring		Financial coaching/financial counseling, learning communities	
	Funding for living expenses		literacy workshops	
	Mental health, substance abuse or other counseling		Financial coaching/financial counseling, learning communities	
	Case management		Academic advising (e.g., course planning)	
	Mentoring		Academic preparation and course support (e.g., study skills)	
	Funding for living expenses		Career navigation	
	Mental health, substance abuse or other counseling		Job search and placement	
	Case management		internship search, and placement assistance gaining work experience,	

● Funding source is commonly used for the specified support service

○ Funding source can be used for the specified support service, but is not widely used due to limited funding, program restrictions, etc.

LIMITATIONS ON THE USE OF TEN FEDERAL PROGRAMS TO FUND SUPPORT SERVICES

(to be used in conjunction with the preceding matrix)

Workforce Investment Act, Title I (Adult and Dislocated Worker Programs): WIA funds can be used for a range of financial, personal, academic, and career transition supports, such as tuition assistance, case management, job search assistance, and assistance with gaining work experience. Supportive services under WIA, which include funding for transportation, child care, dependent care, and other services, are restricted in several ways. They must be necessary to enable an individual to participate in services, and individuals must be unable to obtain these services through other programs. Needs-related payments may be provided to adults and dislocated workers who qualify for them and who require them to participate in services. Supportive services and needs-related payments are optional and may not be available to WIA participants in every local area because of limited funding or local policy choices.

Workforce Investment Act, Title I (Youth Program): WIA youth funds serve youth ages 14 to 21, most of whom must meet specific income-eligibility requirements and face barriers to continued education and employment. Supports provided depend on the specific service strategy designed for each participant, based on an individualized needs assessment. One of the ten required program elements is supportive services, including child care, transportation, dependent care, housing, and needs-related payments. These supports are provided when necessary to participate in youth activities. Youth participants may also receive a range of other WIA-funded financial, personal, academic, and career transition supports, such as tuition assistance, case management, and assistance with gaining work experience.

Workforce Investment Act, Title II (Adult Education and Family Literacy Act): When awarding WIA Title II grants to local adult education providers, states must consider whether supportive services (e.g., child care, transportation) are available to enable individuals to attend and complete programs. Due to limited funding under WIA Title II, supportive services linked to these

programs are often funded with other sources, such as through partnerships with local community-based organizations or community colleges. In addition, an increasing number of states and local providers are hiring “transition coordinators” to help students transition from basic skills courses to postsecondary education or training. Transition coordinators may assist participants in completing financial aid applications, help them navigate career choices, or connect them to community resources or federal benefits for which they may be eligible. Though adult education students may receive tutoring, instruction funded by Title II can only support coursework below the postsecondary level.

Pell Grants: Pell Grant recipients must demonstrate financial need (as calculated using information on the Free Application for Federal Student Aid, FAFSA), be a U.S. citizen or an eligible noncitizen, have a high school diploma or its equivalent (or be an eligible homeschooled student), have resolved any issues related to drug convictions, not be in default on a federal student loan, make “satisfactory progress” in his or her academic program, and not have completed requirements for or earned a bachelor’s degree or higher. If any Pell Grant funds remain after the college applies this and other student aid to tuition and fees, the student gets a refund check and may use these funds to pay for room and board, child care, and transportation expenses in addition to books and supplies necessary for their programs. Students may experience delays in receiving aid due to the processing time for the FAFSA required by the U.S. Department of Education and the postsecondary institution. Students may not receive Pell Grants for more than six academic years (prorated for part-time students). Some shorter vocational programs may not qualify for student aid. Practitioners should work with student aid administrators, college deans, and faculty to maximize program eligibility for student aid, especially for career pathway programs.

Carl D. Perkins Career and Technical Education (Perkins CTE): Perkins CTE funds can support programs that include a broad range of personal, academic, and career transition supports, such as mentoring, the development of learning communities, academic advising,

assistance with internships, and career development. However, the ability to provide direct assistance to individuals is strictly limited. Direct assistance is defined to include tuition, books, supplies, child care, dependent care, and transportation, and it may be provided only to members of special populations who are participating in CTE and require such assistance to address barriers to participation. Direct assistance also must be part of a larger set of strategies to meet the needs of special populations and must supplement, not supplant, assistance that is otherwise available from non-federal sources.⁴⁸

TRIO, Student Support Services (SSS): TRIO SSS is a competitive grant applied for by postsecondary institutions. Competitions for funding take place every five years. Therefore, unless an institution already receives the grant, it may be difficult to access funds. Most SSS programs serve only a small portion of the students who qualify. At each participating institution, the population served by SSS must be two-thirds low-income and first-generation students or students with disabilities. Among those who are disabled, one-third must be low-income. To qualify, students must be U.S. citizens and be eligible for Pell Grants. Students who have unmet need after federal financial aid can receive grant aid through SSS or assistance accessing other financial resources. Funds are also used to meet living expenses for a subset of SSS students—those who are homeless, current foster youth, or foster youth who have aged out of the foster care system—to assist them in securing temporary housing during breaks.

Temporary Assistance for Needy Families (TANF):

TANF is a highly flexible funding stream that can be used to support all types of support services. However, with limited exceptions, TANF funds may be spent only on benefits and services for members of low-income families with children. Because of TANF's flexibility, there are many competing demands for its use. Many states have adopted "work first" approaches under TANF that emphasize immediate employment and provide limited support for recipients to attend school. A few states use TANF funds to support education and training-related services for members of low-income families with children regardless of whether they are

receiving cash assistance, but in most cases, services are only provided to families receiving assistance. For more information, see CLASP resources that highlight innovative state strategies for using TANF for participants in education and training.⁴⁹

Community Services Block Grant (CSBG): CSBG is a flexible block grant that can be used to provide a wide array of anti-poverty services to individuals with incomes below the poverty level (125 percent of poverty at state option). Funding is allocated to all 50 states and distributed through local grantees, typically Community Action Agencies. The CAAs establish program priorities through a community needs assessment and use CSBG funds to address the causes and conditions of poverty in local communities. CSBG is often used to provide support services to participants in career pathway programs to help individuals and families reach self-sufficiency.

Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T): SNAP E&T provides employment-and-training-related services, including some support services, to individuals who are receiving food assistance through SNAP (Food Stamps) and are *not* receiving TANF cash assistance. SNAP E&T funds may not be used to remediate barriers to employment that would have qualified recipients for an exemption from work registration under SNAP. The SNAP E&T program may not be charged more for services than what is charged to the public or other programs for the same activities. Therefore, it may not be used to pay for activities that are otherwise available to students free of charge. However, it may be used to provide supplemental services that are not otherwise available to training participants who are receiving SNAP.

Community Development Block Grant (CDBG): Funds from this flexible block grant are predominantly used for developing affordable and suitable housing for low- and moderate-income individuals and families and for other economic development activities that improve communities. CDBG funds are allocated by the U.S. Department of Housing and Urban Development to large cities, urban counties, and states. States, in turn, spend their funds in smaller communities. With few restrictions,

grantees have significant flexibility in determining how CDBG funds will be used. Communities may spend no more than 15 percent of the grant on public services, including employment, child care, education, and welfare needs, which may include support services. Many communities spend much less on these activities.⁵⁰ The only activities that grantees are expressly prohibited from using CDBG funds to support are overtly political activities and some cash payments.⁵¹ While funds cannot be allocated directly to individual participants, they could subsidize a program's cost as long as the program meets eligibility and national objective requirements.

ENDNOTES

- 1 U.S. Bureau of Labor Statistics, "Education Pays," March 23, 2012. http://www.bls.gov/emp/ep_chart_001.htm. Data are for adults ages 25 and over; earnings are for full-time wage and salary workers.
- 2 U.S. Bureau of Labor Statistics, "Education Pays." However, the Economic Policy Institute has shown that despite relative gains, college graduates have experienced no real wage growth since 2002.
- 3 A recent report by the Economic Mobility Project, *How Much Protection Does a College Degree Afford? The Impact of the Recession on College Graduates*, The Pew Charitable Trusts, 2013, also finds that a college degree helped to shield recent graduates from a range of poor labor market outcomes during the Great Recession. http://www.pewstates.org/uploadedFiles/PCS_Assets/2013/Pew_college_grads_recession_report.pdf
- 4 Anthony P. Carnevale, Tamara Jayasundera, and Andrew R. Hanson, *Career and Technical Education: Five Ways That Pay Along the Way to the B.A.*, Georgetown University Center on Education and the Workforce, 2012.
- 5 Julian L. Alssid, David Gruber, Davis Jenkins, et al., *Building a Career Pathways System: Promising Practices for Community College-Centered Workforce Development*, Workforce Strategy Center, 2002.
- 6 Adapted from Oregon Career Pathways discussion at WorkSource Oregon <http://www.worksourceoregon.org/index.php/career-pathways/128-what-are-career-pathways>
- 7 For a more detailed understanding of the career pathway approach, see *The Alliance for Quality Career Pathways Approach: Developing Criteria and Metrics for Quality Career Pathways - A Working Paper*, <http://www.clasp.org/admin/site/publications/files/CLASP-The-AQCP-Approach-Feb-2013.pdf>.
- 8 U.S. Department of Labor, Employment and Training Administration, Training and Employment Notice No. 36-11, April 4, 2012. http://wdr.doleta.gov/directives/attach/TEN/ten2_36_11.pdf.
- 9 The funding options worksheet is adapted from a framework developed by Wisconsin as part of its RISE initiative.
- 10 The reductions resulted from annual appropriations legislation enacted in FY 2011 and FY 2012.
- 11 Mary Gardner Clagett and Ray Uhalde, *The Promise of Career Pathways Systems Change: What Role Should Workforce Investment Systems Play? What Benefits Will Result?* Jobs for the Future, December 2011.
- 12 In Training and Employment Guidance Letter No. 14-08 issued in 2009, the U.S. Department of Labor clarified requirements related to the sequence of service.
- 13 Clagett and Uhalde, *The Promise of Career Pathways Systems Change*.
- 14 The American Recovery and Reinvestment Act included a provision to allow local boards to contract directly with colleges or eligible training providers if the board determines that will facilitate training of multiple individuals in high-demand occupations and will not limit customer choice. This provision also was included in the FY 2010, FY 2011 and FY 2012 Labor, Health and Human Services appropriations.
- 15 In Training and Employment Guidance Letter No. 14-08 issued in 2009, the U.S. Department of Labor clarified requirements related to the sequence of service.
- 16 A few states have adopted this type of approach. For example, in Illinois, 40 percent of local funds must be spent on training services; in Florida, 50 percent of local funds must be spent on ITAs.
- 17 For a guide to online self-sufficiency tools that have been used by employment programs to focus career counseling on longer term employment goals, see: <http://www.wowonline.org/ourprograms/fess/documents/WOWGuidetoOnlineSelf-SufficiencyToolsFinal.pdf>.
- 18 For more information, see recent guidance issued by the Employment and Training Administration, including Training and Employment Notice No. 36-11 and Training and Employment Notice No. 39-11. These provide career pathways technical assistance resources.
- 19 Annual appropriations legislation enacted in FY 2011 and FY 2012 reduced the portion of funds reserved at the state level from 15 percent to 5 percent.
- 20 The 2011 TAA amendments sunset on December 31, 2013. At that time, the program reverts to the 2002 reauthorization, with several exceptions for one year.
- 21 The benefits and services described in this profile are available to workers covered by petitions filed on or after October 21, 2011.
- 22 Robert I. Lerman, *Training Tomorrow's Workforce: Community College and Apprenticeship as Collaborative Routes to Rewarding Careers*, Center for American Progress, December 2009.
- 23 DOL Training and Employment Guidance Letter (TEGL) 2-07. <http://wdr.doleta.gov/directives/attach/TEGL/tegl2007/TEGL2-07.pdf>.
- 24 Washington State Board for Community & Technical Colleges. *Apprenticeship Fee Guidance* (2012-2013). Guidance can be found here: <http://www.sbetc.ctc.edu/college/workforce/2011-13feeguidance.pdf>
- 25 For state examples, see Lerman, *Training Tomorrow's Workforce*.
- 26 DOL Training and Employment Guidance Letter (TEGL) 2-07. <http://wdr.doleta.gov/directives/attach/TEGL/tegl2007/TEGL2-07.pdf>.
- 27 For a list of AEFLA provisions that support the advancement of individuals into postsecondary education and into further education and training, see *Use of Funds Provided Under the Adult Education and Family Literacy Act (AEFLA) for Integrated Education and Training (IET)*. U.S. Department of Education. June 8, 2010. <http://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/aebla-funds-for-iets.pdf>.
- 28 "Postsecondary level" is not defined in law; however, a common definition that states use is 12.9 grade level.

- 27 For more information, see Amy Ellen Duke and Evelyn Ganzglass, *Strengthening State Adult Education for Low Skilled Workers*, Center for Law and Social Policy, 2007, <http://clasp.org/admin/site/publications/files/0384.pdf>.
- 28 See *Use of Funds Provided Under the Adult Education and Family Literacy Act (AEFLA) for Integrated Education and Training (IET)*.
- 29 See CFR, Title 34, Section 600.2 “*Recognized equivalent of a high school diploma*”. Part 600 – Institutional Eligibility Under the Higher Education Act of 1965, as amended.
- 30 The Department of Education issued two guidance letters in 2012 describing this change and others: “[Dear Colleague Letter GEN 12-01](#)” issued on January 18, 2012; and “[Dear Colleague Letter GEN 12-09](#)” issued on June 28, 2012.
- 31 A student is ineligible for federal financial aid if the conviction occurred while the student was receiving federal financial aid. The period of ineligibility depends upon the number and type of offenses. The student can regain eligibility by meeting certain requirements, including completing a rehabilitation program.
- 32 See Shannon M. Mahan, *Federal Pell Grant Program of the Higher Education Act: Background, Recent Changes, and Current Legislative Issues*, Congressional Research Service, August 4, 2011.
- 33 See Tables 1 & 2 of the “2010-2011 Pell End-of-Year Report,” Department of Education, <http://www2.ed.gov/finaid/prof/resources/data/pell-2010-11/pell-eoy-2010-11.html>
- 34 In December 2011, the U.S. Department of Education announced several new experiments to test alternative methods for distributing federal Title IV student aid under its Experimental Sites Initiative authority. Experiment #2 will test allowing students in short-term training programs of at least 8 weeks in length and at least 150 clock hours that meet local or regional workforce needs. Interested parties should monitor the department’s Experimental Sites website for more information.
- 35 See Michael Leach, *The Arkansas Career Pathways Initiative: A New Model for Delivering Postsecondary Training to Adult Students*, Southern Good Faith Fund, February 2008.
- 36 See WorkSource Oregon’s website: <http://www.worksourceoregon.org/index.php/career-pathways/113-about-oregon-statewide-pathways-initiative>.
- 37 Although the Oregon guidelines do not explicitly mention it, according to federal student aid guidelines, other aid-eligible programs of study can include credit-based certificate programs and short-term, clock-hour certificate programs as defined in this summary.
- 38 This limitation was imposed with the Consolidated Appropriations Act 2012 (Public Law 112-74), passed by Congress in December 2011. Previously, students enrolled after July 1, 2008, were limited to 18 semesters of Pell Grant awards (also prorated). Under current law, all students are limited to no more than 12 semesters of Pell Grant awards.
- 39 For a full list of required and permitted activities that can be carried out with Perkins IV funds, see the legislation at http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=109_cong_bills&docid=f:250enr.txt.pdf.
- 40 For more information on career pathway bridge programs, see, Julie Strawn, *Farther, Faster: Six Promising Programs Show How Career Pathways Bridges Help Basic Skills Students Earn Credentials That Matter*, Center for Law and Social Policy, 2011, <http://www.clasp.org/admin/site/publications/files/Farther-Faster.pdf>.
- 41 State-by-state information on the use of TANF and MOE funds in 2009 is available at: http://www.clasp.org/resources_and_publications/publication?id=0808&list=publications.
- 42 The list of federal programs that can be used to fund support services profiled in this appendix is not exhaustive. Additional programs tend to target specific populations, including workers who have lost jobs due to foreign trade, veterans, individuals with disabilities, Native Americans, and others facing unique labor market challenges. The appendix draws upon a CLASP resource that outlines how to use federal funding sources for Integrated Service Delivery, a strategy that shares key elements with career pathways. For more information see *Federal Funding for Integrated Service Delivery*, CLASP, 2011, http://www.clasp.org/admin/site/publications/files/CWF_ALL.pdf.
- 43 For local examples of braided funding, see Maureen Conway, *The Price of Persistence: How Nonprofit–Community College Partnerships Manage and Blend Diverse Funding Streams*, The Aspen Institute , 2011, <http://www.aspeninstitute.org/sites/default/files/content/docs/pubs/11-005.pdf>.
- 44 For examples of strong partnerships, see the program profiles in this toolkit and additional reports, including Cynthia D. Liston and Robert Donnan, *Clearing the Financial Barriers to Student Success*, Center for Working Families at Community Colleges, MDC, 2012, <http://www.mdcinc.org/sites/default/files/resources/CWF%20Clearing%20the%20Financial%20Barriers%20to%20Student%20Success%20-%20Complete.pdf>, and Maureen Conway, Amy Blair, and Matt Helmer, *Courses to Employment: Partnering to Create Paths to Education and Careers*, The Aspen Institute, 2012, <http://www.aspenwi.org/wordpress/wp-content/uploads/C2E.pdf>.
- 45 Recent research has shown that supports in the form of intensive student coaching can increase persistence in programs and increase completion rates. See Eric P. Bettinger and Rachel Baker, *The Effects of Student Coaching in College: An Evaluation of a Randomized Experiment in Student Mentoring*, Stanford University, 2011. There is also evidence of an association between enrollment in student success courses—a form of support services that enhances the study skills of first-time students and orients them to the institution—and positive academic outcomes. See Sung-Woo Cho and Melinda Mechur Karp, *Student Success Courses and Educational Outcomes at Virginia Community Colleges*, Community College Research Center, Teacher’s College Columbia University, 2012.
- 46 Colleges and other providers increasingly cite the need for funding to help students respond to emergencies. This funding may not be available from most federal programs, but it can be instrumental in preventing a student from dropping out or falling behind in coursework.

- 47 This includes both sources like Pell Grants, which can be used for a range of living expenses, and funds limited to one or more of these expenses.
- 48 Special populations under Perkins include individuals from economically disadvantaged families, individuals with limited English proficiency, single parents and others as listed in the lengthier program profile in the toolkit. For more information, see non-regulatory guidance issued on June 2, 2009 by the Office of Vocational and Adult Education, U.S. Department of Education, <http://cte.ed.gov/docs/nonregulatory/PerkinsIVNon-RegulatoryGuidanceQAVersion3.0.pdf>.
- 49 For examples of states using TANF for education and training, see CLASP resources at <http://www.clasp.org/postsecondary/pages?id=0007#state>.
- 50 For more information on the TRIO Student Support Services Program, see *Federal Funding for Integrated Service Delivery, a Toolkit*, p. 15, http://www.clasp.org/admin/site/publications/files/CWF_ALL.pdf.
- 51 U.S. Department of Housing and Urban Development, “Community Development Block Grant Entitlement Communities Grants,” September 5, 2012, http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs/entitlement#ineligibleactivities.

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