

Refocusing Adult Education on Career and Postsecondary Success:

An Analysis of Adult Education (Title II) Provisions in WIA Reauthorization Proposals



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Two proposals to reauthorize the Workforce Investment Act (WIA) are in the House of Representatives: the *Workforce Investment and Improvement Act of 2012 (H.R. 4297)*, sponsored by Rep. Foxx (NC-5) and co-sponsored by four additional members¹, and the *Workforce Investment Act of 2012 (H.R. 4227)*, sponsored by Rep. Tierney (MA-6), Rep. Miller (CA-7), and Rep. Hinojosa (TX-15) and cosponsored by 19 additional members.² Both proposals reflect a priority of greater alignment among adult education (Title II), workforce development (Title I), and postsecondary education, and both increase the focus on preparing adult students not just to earn a secondary school diploma but for college and careers. Despite these similarities, the bills differ across several dimensions, such as the degree to which they hold states and local providers accountable for improving student access and success in postsecondary education and the commitment to expanding the capacity and resources of the adult education system nationally.

This analysis highlights key provisions in each bill that strengthen or weaken the overall goal of refocusing Title II on career and postsecondary success.³ The analysis is organized by CLASP's four core priorities in adult education:

- To align services and improve outcomes across workforce development, postsecondary education, and adult education/English as a Second Language;
- To incent and encourage innovation in promising practices, such as career pathways, contextualization, dual or concurrent enrollment, and integrated basic education and occupational skills training;
- To develop a national research center for adult education to advance promising practices and expand and improve the body of evidence-based research; and
- To fund Title II to meet the growing demand for adult education and English language services.

On the whole, H.R. 4297 offers improvements to the adult education system and supports alignment between programs, although it does little to ensure that this alignment will happen. Furthermore, it creates an option for states to override adult education requirements and consolidate these funds with a newly created Workforce Investment Fund, leaving no assurances that low-skilled adult learners will be served. H.R. 4227 modernizes and enhances the adult education system to better meet the longer-term, postsecondary, and employment needs of students. It also builds capacity for additional research on innovative and promising practices that have the potential to accelerate student progress toward these goals. Lastly, it requires that education and training programs work together in each state to develop a joint state plan, yet it maintains individualized programs to ensure that those who need targeted attention or more specialized instruction can receive it.



Priority 1: Align services and improve outcomes across workforce development, postsecondary education, and adult education/English as a Second Language.

Currently, collaboration between workforce and adult education partners is difficult, and they have few strong incentives to work together. Even when state and local partners take great strides to collaborate, they encounter significant barriers. These include different and conflicting performance measures, different provider networks, and the lack of unified state plans requiring collaboration. Greater alignment across these and other dimensions would help the adult education system work better with partners to develop programs that connect low-skilled adults to education and training opportunities beyond what the adult education system alone can offer. Alignment should facilitate collaboration with human services, postsecondary institutions, career-technical education, employers, and others. A growing number of states are using widespread, cross-system collaboration of this sort to build career pathway frameworks for education and training, which can lead to higher rates of completion and transition to postsecondary education among students whose skills are initially low.

Notably, a system of shared accountability is part of both WIA proposals, which would strengthen connections between programs and reduce the current disincentives for Title I and II programs to work together. Additionally, both proposals reflect a priority on greater programmatic alignment among adult education, workforce development programs, and postsecondary education. However, the two bills take different approaches.

H.R. 4297 provides an option for unified state planning across core programs and establishes a “super waiver” that gives states the option to consolidate funding for adult education (and other education and training programs) with workforce funding under a Workforce Investment Fund. A state could treat such consolidated funds as though they were originally allocated to the Workforce Investment Fund. Importantly, the fund is designed to serve *all* jobseekers without adequate assurance that individuals with lower skills (such as those currently in adult education) would be served.⁴ Furthermore, H.R. 4297 misses key opportunities to strengthen the focus on postsecondary access and success by not requiring states to seek opportunities for alignment and collaboration between education and training systems using state leadership funds.

By contrast, H.R. 4227 requires a joint state plan across core programs and ensures that such a plan is collaborative by requiring the state to report on its development process. Additionally, funds provided to Title II are required to be used on activities outlined in Title II and would not be consolidated with other, broader purpose funds.

CLASP Recommendation	Workforce Investment and Improvement Act H.R. 4297	Workforce Investment Act of 2012 H.R. 4227
<p>Refocus the purpose of adult education on preparing low-skilled adults and English language learners for postsecondary access and success.</p>	<ul style="list-style-type: none"> • Modifies the existing language on the purpose of Title II to emphasize postsecondary transitions and preparation for employment in addition to the attainment of a secondary school diploma or its equivalent and basic literacy. (<i>Sec. 202</i>) 	<ul style="list-style-type: none"> • Expands existing language to include eight stated goals of adult education, such as: <ul style="list-style-type: none"> ○ Support postsecondary transition and preparation for employment through career pathways; ○ Assist adults to develop technology literacy; ○ Assist states to expand a 21st century delivery system that meets the needs of adults at all skill levels; ○ Enable completion of adult education and success in postsecondary education. (<i>Sec. 202</i>)
<p>Develop a shared system of accountability with core WIA programs, removing the current disincentive for the two programs to work together to serve common clients.</p>	<ul style="list-style-type: none"> • Develops shared performance measures for use across all core programs, including an interim measure of progress for students who are working toward a secondary school diploma or equivalent or a postsecondary credential but who do not achieve those ultimate outcomes within a year of exit from the program.⁵ (<i>Sec. 114</i>) 	<ul style="list-style-type: none"> • Develops shared performance measures for use across all core programs,⁶ including an interim measure of progress for students who are working toward a secondary school diploma or equivalent or postsecondary credential but who do not achieve those ultimate outcomes within a year of exit from the program. (<i>Sec. 118</i>) • Requires additional Title II indicators: (1) demonstrated basic skill gains, (2) receipt of a secondary school diploma or equivalency, (3) attainment of an industry-recognized credential (including workforce readiness credentials), (4) placement in, retention in, or completion of a postsecondary education or training program. (<i>Sec. 212</i>) • Requires states to set benchmarks for system-wide indicators of alignment and coordination among programs. Indicators include: the total number and percentage of participants concurrently enrolled in two or more core programs and the total number and percentage of participants engaged in career pathways. (<i>Sec. 118</i>)

CLASP Recommendation	Workforce Investment and Improvement Act H.R. 4297	Workforce Investment Act of 2012 H.R. 4227
<p>Require core programs to conduct joint planning through a unified process and set priorities of postsecondary transition and employment for adult education students.</p>	<ul style="list-style-type: none"> • Modifies the five-year plan requirement to a three-year plan requirement across core programs. <i>(Sec. 224)</i> • Requires the state plan to describe the process used for public comment, including consultation with the state workforce board, the state community or technical college system, and other agencies. <i>(Sec. 224)</i> • Requires the state plan to describe how the state agency that administers adult education will coordinate with the state postsecondary agency to reduce the need for remediation upon postsecondary transition. <i>(Sec. 224)</i> • Provides an option to create a state unified plan that includes adult education and other core programs but does not require it. <i>(Sec 224)</i> • Allows states to consolidate all funds provided under several programs,⁷ including adult education in Title II, with the Workforce Investment Fund (the single fund created in Title I by the consolidation of 27 existing workforce programs) under a state unified plan for two or more programs. This provision further allows states to override Title II program requirements for funds that are consolidated and treat such funds as if they were original funds allocated to the Workforce Investment Fund. Few safeguards exists to ensure that these Title I funds would be used for the provision of service to low-income, low-skilled workers.⁸ <i>(Sec. 127)</i> 	<ul style="list-style-type: none"> • Requires a common state plan for core programs to “align education, training, and workforce development programs in support of a comprehensive workforce investment system.” Further allows states to include additional programs beyond the core programs in a state unified plan instead of submitting a separate plan for those programs.⁹ <i>(Sec. 112)</i> • Requires the state to articulate the methods and processes used to develop the joint plan in order to ensure that it is truly collaborative and not simply submitted jointly. <i>(Sec. 112)</i> • Requires the joint plan to provide, among other requirements: <ul style="list-style-type: none"> ○ A description of how the state will develop and implement career pathways and career and technical education by aligning workforce investment programs and supportive services; ○ An assessment of the need for adult education and literacy activities in the state; and ○ A description of how adult education and literacy activities will be integrated with other education and training activities. <i>(Sec. 111)</i>

Priority 2: Incent and encourage innovation in promising practices, such as career pathways, contextualization, dual or concurrent enrollment, and integrated basic education and occupational skills training.

A growing, knowledge-based economy demands that more workers have postsecondary credentials or other training beyond high school, such as apprenticeships. Rather than simply be a vehicle for completing high school, adult education should become the first step for lower-skilled adult learners on career pathways that lead to postsecondary credentials and career advancement. Reauthorization of WIA should advance the replication of promising strategies that accelerate success for learners and seamlessly connect them with postsecondary education, job training, or employment. These strategies include career pathways, bridge programs, integrated basic education and occupational skills training, dual or concurrent enrollment, managed enrollment, and contextualization. Title II should be revised to support these promising practices and improve the likelihood of postsecondary transition or employment for adult learners.

H.R. 4297 modifies existing language and creates new definitions that reflect a greater focus on postsecondary access and transition (e.g., “English language acquisition program,” “Integrated education and training”). However, it does not explicitly support the use of career pathways to meet those goals. It also maintains the current proportion of funding for state leadership activities (not more than 12.5 percent) and does not require states to use these funds on statewide efforts to improve student transition and completion rates in postsecondary education. Statewide activities, such as professional development, alignment with other state education and training systems, technical assistance, and the development of cross-system career pathways, are key to ensuring that students statewide—not just those in individual and well-funded local programs—have access to postsecondary education and career advancement.

H.R. 4227 establishes new, high-quality definitions of promising practices (e.g., “career pathways,” “integrated education and training,” “Integrated English Literacy and Civics Education”) to support the goal of postsecondary access and success for adult education students. Furthermore, it increases the proportion of funds available for state leadership activities (no more than 15 percent) and requires states to place a priority on using these funds to develop and implement career pathways and improve system and program alignment. It also establishes a set of 16 considerations that states must use to evaluate potential local grantees, and these considerations focus heavily on ensuring that local programs align their services with other education and training programs and develop innovative models focused on college and career readiness.

CLASP Recommendation	Workforce Investment and Improvement Act H.R. 4297	Workforce Investment Act of 2012 H.R. 4227
<p>Build into existing definitions an acknowledgement of the importance of postsecondary and career success.</p>	<ul style="list-style-type: none"> Modifies the definition of “English literacy program” to “English language acquisition program” and emphasizes transition to and success in postsecondary education as well as employment in this definition. Modifies the definition of “literacy” to mean “an individual’s ability to read, write, and speak in English, compute, and solve problems at a level of proficiency necessary to obtain employment and to successfully make the transition to postsecondary education.” (Sec. 203) 	<ul style="list-style-type: none"> Modifies or adds key terms, such as “adult education,” “English language acquisition program,” “Integrated English Literacy and Civics Education,” “Workforce Preparation Activities,” and “Workplace Adult Education and Literacy Activities,” to emphasize transition to and success in postsecondary education as well as employment. (Sec. 201)
<p>Establish a common and robust definition for integrated education and training.</p>	<ul style="list-style-type: none"> Defines “integrated education and training” as “services that provide adult education and literacy activities contextually and concurrently with workforce preparation activities and workforce training for a specific occupation or occupational cluster. Such services may include offering adult education services concurrent with credit-bearing postsecondary education and training, including through co-instruction.” (Sec. 203) 	<ul style="list-style-type: none"> Uses the same definition as H.R. 4297. Defines “integrated education and training” as “services that provide adult education and literacy activities contextually and concurrently with workforce preparation activities and workforce training for a specific occupation or occupational cluster. Such services may include offering adult education services concurrent with credit-bearing postsecondary education and training, including through co-instruction.” (Sec. 201)
<p>Establish a common and robust definition for career pathways.</p>	<ul style="list-style-type: none"> Does not define “career pathway.” 	<ul style="list-style-type: none"> Defines a career pathway as a sequence of education, training, and other supportive services, clearly articulated from one level of instruction to the next, that are designed to prepare individuals to meet a set of career-related objectives, which include supportive services and may include concurrent or contextual instruction. Further defines a career pathway as meeting participants’ needs, such as flexible scheduling, multiple entry and exit points (that may correspond with work and stackable credentials), and giving credit for learning toward credentials and adopting other strategies that accelerate the educational and career advancement of the participant to the extent practicable. (Sec. 101)

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<p>Establish a common and robust definition for career pathways. (cont.)</p>		<ul style="list-style-type: none"> Establishes that, at a minimum, career pathways should include the alignment of core programs together with postsecondary education and training programs. (Sec. 101)
<p>Expand the percentage of funding that can be used as State Leadership Funds from 12.5 percent to 15 percent, which can be used to incent innovation.</p>	<ul style="list-style-type: none"> Maintains the percentage of funding that can be used for state leadership activities at 12.5 percent of the total state grant. (Sec. 222) 	<ul style="list-style-type: none"> Increases the percentage of funding that can be used for state leadership activities to 15 percent of the total state grant. (Sec 203)
<p>Provide for state leadership activities that support the growth and use of promising practices that help connect low-skilled adults with employment and postsecondary credentials.</p>	<ul style="list-style-type: none"> Does not require the state to engage in any state leadership activities that would foster alignment between Title I and Title II or support a greater focus on postsecondary transition. (Sec. 223) Allows the state to use these funds for 11 activities, such as coordination with other public programs, including welfare-to-work, workforce development, and job training programs; coordination with support services; development and implementation of a system to assist in the transition from adult basic education to postsecondary education; and integration of adult education with occupational skills training and building connections to employers. (Sec. 223) 	<ul style="list-style-type: none"> Requires state leadership funds to be used for aligning adult education with other core programs to implement the state plan, including the development of career pathways, the dissemination of promising practices within the state, and the development of content standards to ensure college and career readiness of adult education students. (Sec. 203) Allows the state to use funds for 15 other activities, such as the provision of technical assistance to implement integrated education and training and career pathways, technical assistance to providers to build quality data systems, the implementation of a system to assist in postsecondary transition, and the integration of English language services with occupational skills training. (Sec. 203)
<p>Require adult education providers to support postsecondary access and success for adult education students through their program offerings.</p>	<ul style="list-style-type: none"> Requires eligible providers to establish or operate (1) programs that provide adult education and literacy activities; (2) programs that provide such activities concurrently with postsecondary education or training or employment activities; and (3) credit-bearing postsecondary coursework. (Sec. 231) 	<ul style="list-style-type: none"> Requires eligible providers to establish or operate programs that provide adult education and literacy activities, programs that provide such activities concurrently with postsecondary education or training or employment activities, and credit-bearing postsecondary coursework. (Sec. 204)

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<p>Require adult education providers to support postsecondary access and success for adult education students through their program offerings. (cont.)</p>	<ul style="list-style-type: none"> • Requires eligible providers to demonstrate progress on 15 measurable goals, including that: <ul style="list-style-type: none"> ○ The activities provide instruction in real-life contexts, including integrated education and training, when appropriate; ○ The services are provided with other available community resources, such as those at postsecondary institutions, one-stops, job training programs, etc.; and ○ The activities offer flexible schedules and supportive services. (<i>Sec. 231</i>) 	<ul style="list-style-type: none"> • Requires the state to evaluate funding for eligible providers based on 16 considerations, including: <ul style="list-style-type: none"> ○ Whether the eligible provider’s activities provide contextualized learning with occupational skills training; and ○ The capacity of the provider to deliver integrated education and training and offer, or connect students to, career pathways that lead to economic self-sufficiency. (<i>Sec. 204</i>) • Requires eligible providers to describe how they will promote alignment and concurrent enrollment with other core programs and postsecondary education and how they will promote access to career pathways. (<i>Sec. 204</i>)
<p>Revise national leadership activities to include those that support the broader goals of postsecondary access and success.</p>	<ul style="list-style-type: none"> • Allows national leadership activities to include, among others: <ul style="list-style-type: none"> ○ Improving the coordination, efficiency, and effectiveness of adult education and workforce development services at the national, state, and local levels; ○ Determining how participation in adult education, English language acquisition, and family literacy education prepares individuals for entry into and success in postsecondary education and employment; ○ Identifying model integrated basic and workplace skills education programs. (<i>Sec. 242</i>) 	<ul style="list-style-type: none"> • Allow national leadership activities to include several activities, such as funding demonstration projects that: <ul style="list-style-type: none"> ○ Accelerate learning outcomes for eligible individuals with the lowest literacy levels; ○ Promote career pathways for eligible individuals; and ○ Promote concurrent enrollment programs in adult education and credit-bearing postsecondary coursework. (<i>Sec. 205</i>)

CLASP Recommendation	Workforce Investment and Improvement Act H.R. 4297	Workforce Investment Act of 2012 H.R. 4227
<p>Revise national leadership activities to include those that support the broader goals of postsecondary access and success. (cont.)</p>		<ul style="list-style-type: none"> • Allow national leadership activities to include developing and replicating model and innovative programs, including: <ul style="list-style-type: none"> ○ Programs for skill certification; ○ Integrated education and training programs; ○ Programs providing adult education and literacy activities coordinated with employment services; and ○ Postsecondary education and training transition programs. <i>(Sec. 205)</i>
<p>Other provisions</p>		<ul style="list-style-type: none"> • Establishes a rule of construction regarding postsecondary transition and concurrent enrollment activities that clarifies nothing in Title II shall be construed to discourage the use of funds for activities that help eligible individuals transition to and succeed in postsecondary education, including credit-bearing coursework, and training or employment, or for concurrent enrollment activities. <i>(Sec. 205)</i> • Establishes a national Workforce Innovation Fund, a competitive grant program funded jointly by reservations from core program allocations, to incent innovative and promising practices across the core programs. <i>(Sec. 157)</i>

Priority 3: Develop a national research center for adult education to expand and improve the body of evidence-based research and advance promising practices.

Unlike elementary/secondary education and higher education, the adult education system has long been starved of rigorous research on best practices, particularly on innovative approaches that have emerged in the last several years, such as career pathways, dual and concurrent enrollment, and contextualization. Also unlike the case with the higher-profile systems, no independent national adult education research centers fill this void. The two organizations that filled this role in the past, the National Center for the Study of Adult Learning and Literacy (NCSALL) and the National Institute for Literacy (NIFL) have lost their funding or been eliminated. There is also only a very limited number of graduate-level adult educator programs from which new research emerges. A national research institute for adult education, with a focus on the advancement of best practices that aid transition and success in postsecondary education and training for adult learners, is badly needed and would be an invaluable resource for the field as it pursues evidence-based strategies.

H.R. 4297 repeals authorization for the National Institute for Literacy, which is currently unfunded but authorized. Furthermore, that bill does not create any additional capacity for the system to pursue research in the field beyond that provided by national leadership funds. In contrast, H.R. 4227 restores the much-needed independent research body—referred to as the National Institute for Adult Education and Literacy in the bill—and also provides \$250 million for a national adult learning and technology resource center. This funding would allow the system to explore new models for improving adult education services that improve the ability of students to gain digital literacy and benefit from cost-saving technologies.

CLASP Recommendation	Workforce Investment and Improvement Act H.R. 4297	Workforce Investment Act of 2012 H.R. 4227
<p>Restore a national adult education research center.</p>	<ul style="list-style-type: none"> • Repeals the National Institute for Literacy. • Does not establish an adult education research center. 	<ul style="list-style-type: none"> • Establishes a National Institute for Adult Education and Literacy to provide leadership regarding effective adult education and literacy activities for adults and families, including the identification of research topics. (<i>Sec. 205</i>) • Establishes that the institute will support the development and replication of promising and proven approaches to adult education and literacy activities; provide advice to the departments of Education, Labor, Health and Human Services, and others; and provide information to Congress annually on effective best practices, among other activities. (<i>Sec. 205</i>) • Articulates 9 key duties, including: <ul style="list-style-type: none"> ○ To reinforce and support the alignment between core programs and postsecondary education; and ○ To disseminate best practices on adult education, including integrated education and training. (<i>Sec. 205</i>) • Provides \$250 million to create a national adult learning and technology resource center and reserves 1.5 percent of adult education funding (not to exceed \$15 million) to carry out the remainder of the institute’s activities. (<i>Sec. 205</i>)



Priority 4: Fund Title II to meet the growing demand for adult education and English language services.

Federal funding for adult education has remained flat for several years and declined in real dollars by 17 percent in the last decade. A recent survey of state directors of adult education shows that nonfederal funding for adult education has also declined precipitously. Once at a high of \$3.75 for every \$1 of federal funds, nonfederal funds are stand at approximately \$1.20 for every \$1 of federal contributions.¹⁰ In 2009-2010, over 160,000 adult students remained on waiting lists across 49 states; as the funding capacity of the system has dwindled, the number of students on waiting lists is likely to have increased even further. In addition, codification of the EL/Civics program is vital: it can provide a flexible funding source for innovative pathways models that serve English language learners.

The two bills differ markedly in their approaches to expanding the capacity of the adult education system to meet new expectations of ensuring that students with low basic skills are prepared for college and career readiness. H.R. 4297 eliminates the requirement for states to maintain a certain level of financial effort—measured by cost per student and aggregate expenditure—or face a reduction in their federal allocation. While states would still be required to provide a 25 percent nonfederal match (a current requirement), eliminating this “maintenance of effort” provision could result in significant declines in state and local funding and threaten the availability of services to adults with lower basic skills or limited English proficiency. In addition, the bill authorizes current levels of federal funding for the program for FY 2013 and the following five fiscal years. While level funding in this time of fiscal restraint is positive, extending it for five years beyond FY 2013 allows for no growth in the system.

By contrast, H.R. 4227 authorizes \$1.1 billion for Title II, nearly double the current level. This is consistent with the increased demand for the system and the need to modernize adult education offerings nationally. It also codifies the EL/Civics program, making it part of the Title II funding stream. Currently, EL/Civics is funded only through the annual appropriations process.

CLASP Recommendation	Workforce Investment and Improvement Act H.R. 4297	Workforce Investment Act of 2012 H.R. 4227
<p>Fully fund adult education services under Title II.</p>	<ul style="list-style-type: none"> • Authorizes appropriations of \$606 million for Title II for FY 2013 and each of the succeeding five fiscal years. This funds adult education at the existing FY 2012 level. (<i>Sec. 205</i>) • Eliminates the maintenance of effort requirement that requires states to maintain 90 percent of the fiscal effort per student or aggregate expenditure or face a proportionate reduction in federal funding. (<i>Sec. 241 of current Workforce Investment Act of 1998</i>) 	<ul style="list-style-type: none"> • Authorizes \$1.1 billion in appropriations for FY 2013 and each succeeding fiscal year. This is nearly double the FY 2012 funding level. (<i>Sec. 201</i>)
<p>Codify EL/Civics so it does not rely on the annual appropriations process for continued funding.</p>	<ul style="list-style-type: none"> • Does not codify EL/Civics. 	<ul style="list-style-type: none"> • Codifies EL/Civics and requires a report to Congress about the English language instructional needs of adult immigrants. (<i>Sec. 244</i>)



¹ Co-sponsors are Rep. Bucshon (IN-8), Rep. Heck (NV-3), Rep. Kline (MN-2), Rep. McKeon (CA-25), and Rep. Roe (TN-1).

² Co-sponsors are Rep. Baca (CA-43), Rep. Conyers (MI-14), Rep. DeFazio (OR-4), Rep. Grijalva (AZ-7), Rep. Holt (NJ-12), Rep. Jackson Lee (TX-18), Rep. Keating (MA-10), Rep. Kildee (MI-5), Rep. Lee (CA-9), Rep. Lewis (GA-5), Rep. Loeb (IA-2), Rep. McCollum (MN-4), Rep. McGovern (MA-3), Rep. Nadler (NY-8), Rep. Norton (DC), Rep. Reyes (TX-16), and Rep. Richardson (CA-37), and Rep. Woolsey (CA-6).

³ For a full summary of the provisions of each bill, visit www.nationalskillscoalition.org.

⁴ For a discussion of the Workforce Investment Fund in H.R. 4297, see “Reauthorizing the Workforce Investment Act: The House Workforce Block Grant Bill Heads in the Wrong Direction,” available at: <http://www.clasp.org/admin/site/publications/files/Wrong-Direction-for-WIA.pdf>.

⁵ Core programs in H.R. 4297 are “all employment and training activities under section 134, adult education and literacy activities under Title II, and programs under Title I of the Rehabilitation Act.”

⁶ Core programs in H.R. 4227 are: the Adult Program (Title I), Dislocated Worker Program (Title I), Youth Workforce Investment Program (Title I), Adult Education and Literacy (Title II), sections 1 through 13 of the Wagner-Peyser Act, and Title I of the Rehabilitation Act.

⁷ Other programs that are eligible to be included in the state unified plan are: programs and activities under Title I of WIA, programs and activities under Title II of WIA, programs authorized under the Rehabilitation Act of 1973, secondary career education programs authorized under the Carl D. Perkins Career and Applied Technology Education Act, postsecondary career education programs authorized under the Carl D. Perkins Career and Applied Technology Education Act, Trade Adjustment Act programs, programs under the National Apprenticeship Act, programs authorized under the Community Services Block Grant, TANF programs, programs authorized under state unemployment compensation laws, work programs under the Food Stamp Act of 1977, programs and activities under Title I of the Housing and Community Development Act of 1974, programs and activities under the Public Workers and Economic Development Act of 1965, and activities as defined under chapter 41 of Title 38, U.S. Code (veterans training and placement services). Funds from these programs can be consolidated into the Workforce Investment Fund and treated as though they are Workforce Investment Fund dollars, with the exception of career and technical education funds provided to a state under the Carl D. Perkins Act.

⁸ For an analysis of Title I provisions in H.R. 4297, see Reauthorizing the Workforce Investment Act: The House Workforce Block Grant Bill Heads in the Wrong Direction. <http://www.clasp.org/admin/site/publications/files/Wrong-Direction-for-WIA.pdf>.

⁹ These programs are: career and technical education programs under the Carl D. Perkins Career and Technical Education Act, Temporary Assistance for Needy Families, Supplemental Nutritional Assistance Program (SNAP) employment & training, work programs under the Food and Nutrition Act, Trade Adjustment Assistance, veterans’ programs under chapter 41 of Title 38 of the U.S. Code, programs authorized under state unemployment compensation laws, programs under Title V of the Older Americans Act, employment and training activities carried out by the Department of Housing and Urban Development, employment and training activities under the Community Services Block Grant, and programs under the Second Chance Act.

¹⁰ CLASP/NCSDAE Survey of State Financing and Tuition Policies (Forthcoming).