The Center for Law and Social Policy (CLASP) is pleased to submit our comments on recommended changes for Titles I and II of the Workforce Investment Act (WIA). We believe that the current economic crisis with high levels of unemployment necessitates a reconsideration of workforce policies developed under different economic conditions. WIA reauthorization provides an opportunity to not only address selected problems specific to each program, but to promote closer connections between these two programs and greater alignment with other workforce development programs to better advance the prospects of low-income, low-skilled youth and adults. These comments reflect our current best thinking on ways to improve services for this population. However, we continue to refine our recommendations and will share additional ideas with you in the future.

Comments on Title I

What are the Problems with the Current Workforce Investment System?

Strengthening workforce education and training programs is critical to ensure that low-income individuals, low-wage workers, and those with low basic skills can enter and advance in the labor market, and that American businesses have access to workers with the skills they need in order to compete in the global economy. When the economy is weak, reemployment and retraining services are needed to help unemployed people get back to work. However, today’s WIA system is spread too thin to adequately support either employers’ need for a skilled workforce or to help low-income job seekers and workers build the skills necessary to succeed in the labor market.

Too little funding. Since 1979—the peak year of federal investment in employment and training programs, funding has declined in real terms by nearly 70 percent.1 Between 2000 and 2007 alone, funding for Workforce Investment Act programs for adults, dislocated workers and youth declined by about 12 percent, according to the Congressional Research Service.1

Shift away from human capital development. The funding declines coupled with the new mandate to provide universal services through a one-stop system, and a tiered service delivery model that is understood in many local areas to mean that the provision of training is the last resort for individuals who do not find work through core or intensive services, have led the system to a focus on lower-
intensity core services—at the expense of skill development and systemic labor market change, which should be at the center of the nation’s workforce development system.

*Decline in Intensive and Training Services for Low-Income and Low-Skill Adults.* CLASP analysis of the Workforce Investment Act Title I-B Standardized Record Data (WIASRD) for the Adult program suggests that in the transition from targeted services under the Job Training Partnership Act (JTPA) to universal services under WIA, coupled with the mandate for a one-stop system and declining funding, the workforce development system has shifted limited resources away from serving those most in need. ii Our analysis focuses exclusively on individuals who have received intensive and training services, since low-income individuals have priority of service in these categories, while core services are universally available.

Although the number of individuals receiving intensive and training services under the Adult program has fluctuated since 2000, the characteristics of those receiving these services have shifted and a smaller share is low-income or low-skilled. Specifically:

- **The share of low-income individuals who receive intensive and training services has declined significantly.** In 2000, the first year of WIA, 84 percent of exiters who received intensive and training services were low-income, dropping to 53.7 percent during PY 06 (between the period of April 2006 to March 2007, which is the most recent period for which data is available). iii

- **The share of individuals with low levels of educational attainment who receive intensive and training services has declined, while the share of those with higher levels of educational attainment has increased.** In PY 2000, 77.9 percent of adults who received intensive or training services had a high school diploma or less, falling to 68.7 percent in PY 2006. iv In PY 2000, 21.9 percent of adults who had received intensive or training services had some postsecondary education; and in 2006, 31.3 percent had some postsecondary education. While in 2006, 8.6 percent of four-year college graduates received intensive or training services, only 2.9 percent of those who had only completed 8th grade or less received these services. v

- **The share of individuals who are limited English proficient receiving training services has declined.** In 2000, 10 percent of exiters who received intensive or training services were limited English proficient, falling to 4.9 percent of training exiters in PY 2006. vi Although adult education and literacy activities are both allowable training activities under WIA when provided in conjunction with other types of training, between April 2006 and March 2007, only 4.2 percent of exiters received Adult Basic Education (ABE) or English as a Second Language (ESL) in conjunction with other types of training services. vii

- **Youth in high risk categories are greatly underserved by the WIA system.** Only 22.6 percent of youth ages 16 to 21 served in WIA were dropouts, and only 8.9 percent were young offenders. While the number of dropouts are up from 16.8 percent in 2002, these youth are substantially underserved. Additionally, since 2002 the proportion of youth served with limited English ability decreased by one third; the share of youth from TANF families decreased by 21 percent; and the share of foster care youth by more than half – from 4.3 to 1.8 percent. viii
What should be done to address these problems?

A long term commitment to reinvesting in these programs is sorely needed. In addition, CLASP recommends that Congress refocus WIA’s service delivery and policy coordination functions to make WIA programs pathways out of poverty for low-income and low-skilled youth and adults. Building such pathways will shifting the focus of Title I adult and youth programs from low-intensity employment services to training services that build skills and add more value to participants’ employability so that they can access jobs that pay family- supporting wages, benefits and have advancement potential. To accomplish this shift, Congress should:

Require a minimum percentage of funds be spent on training services. Congress should set a floor for how much WIA funding must be devoted to training—such as 50 percent —with a reasonable phase-in period for reaching that floor. A few states have already adopted this type of approach. For example, in Illinois, 40 percent of funds must be spent on training services, and in Florida, 50 percent of funds must be spent on ITAs. As a result, in 2005, 64 percent of Florida’s expenditures went to ITAs. In order to ensure that this type of policy encourages training services to low-skilled individuals and individuals with barriers to employment, the definition of training expenditures could include the costs of case management and supportive services for clients receiving training, including those receiving training from other funding sources (for example, Temporary Assistance for Needy Families or Pell Grants). In addition, the definition of training should include programs that incorporate basic skills and English language training.

Rationale: Under JTPA, at least 50 percent of funds had to be spent on training (the definition of training under JTPA was broader than the definition under WIA and included activities which are counted as intensive services under WIA). WIA has no such requirements, and there are no federal reporting requirements on the percentage of adult and dislocated worker funds that are spent on training. A GAO study found that local workforce boards nationwide used an estimated 40 percent of available WIA adult and dislocated worker funds to provide training for WIA participants during PY 2003. However, anecdotal information suggests that local investment in training varies widely, with some localities spending less than 10 percent of WIA funds on training. It is fair to assume that if areas have fewer resources allocated to training, individuals with low educational attainment or other barriers to employment may be even less likely to receive it, since they typically require more intensive interventions which may be more costly.

Eliminate the sequence of service. Individuals should be assessed and then immediately provided with the services they need.

Rationale: Eliminating WIA’s sequential provisions would allow local boards and one-stop centers the flexibility to provide appropriate services to customers in a timely manner. There is no requirement that individuals spend a particular period of time in each service category, and the preamble to the regulations leaves it up to local areas to determine the appropriate service mix; however, these sequential provisions have caused confusion in the field and delays and denials of services to those who could benefit from them.

Target intensive and training services toward low-income and low-skill individuals. The existing priority of service language in WIA should be strengthened and states should be required to report in
the state plan how priority of service requirements will be implemented. The federal government should be required to monitor the states for compliance with these requirements.

**Rationale:** Under WIA, public assistance recipients and low-income individuals have priority of service for training and intensive services when funds are limited.\textsuperscript{xiii} The law requires that “the appropriate local board and the Governor shall direct the one-stop operators in the local area with regard to making determinations related to such priority.”\textsuperscript{xiii} However, the law does not provide specific guidance on what prioritization involves; nor does it specify mechanisms for enforcing such a priority. The declining share of low-income individuals receiving intensive and training services suggests that the priority of service is not being implemented in all areas and that there is a need for both more guidance and monitoring for compliance.

**Allow for flexible delivery of training services.** Congress should give local areas the flexibility to provide training either through Individual Training Accounts (ITAs) or through contract training as appropriate. Allowing training to be provided through contracts facilitates the provision of specialized training programs that are designed to meet the needs of lower-skilled adults, or individuals with other barriers to employment. The use of contracts can also facilitate the provision of training to groups or cohorts of lower skilled adults with similar needs, which can provide important peer support to participants. In this regard, the Act should provide additional flexibility within WIA Title I to provide basic skills and English language training and encourage the development of programs that blend occupational training with basic skills and English language instruction, to accelerate learning and help students gain the skills and credentials required for higher paying jobs.

**Rationale:** The current focus on training primarily through ITAs unnecessarily discourages the use of contract training, which can be an effective way to design programs that are tailored to the needs of low-skilled individuals, such as bridge programs, which prepare adults with low basic skills to enter postsecondary education and training programs.\textsuperscript{xiv}

**Ensure performance measures encourage services to individuals with barriers to employment.** Congress should mandate that the federal government adjust performance standards to take into account characteristics of participants that might negatively affect performance. Performance measures should be redesigned to place greater emphasis on rewarding the system for increasing the skills and employability of low-skilled participants. In this way, the performance measures will encourage, rather than discourage, the provision of longer-term and more intensive services to low-skilled individuals and populations with barriers to employment. In addition, Congress also should fund the National Academy of Science to study current performance measures across workforce development, adult education and career and technical education programs, and develop recommendations for a new performance accountability system that will facilitate better integration among programs, and provide incentives to serve disadvantaged individuals.

**Rationale:** There is strong evidence that the WIA performance system encourages “creaming” (the provision of services to individuals who are perceived as more likely to be successful in the labor market). Under JTPA, performance expectations were statistically adjusted to take into account the characteristics of populations served and the economic conditions that typically impact program performance. WIA adopted a flexible performance negotiation process that uses a range of criteria for setting baseline performance levels, including the percentage of low-income individuals in the area. In 2002, a GAO study found that states felt that the negotiation process did not sufficiently account for variations in economic conditions or population served, and researchers who studied WIA
implementation in eight states found similar concerns among program administrators. xv Researchers who studied WIA implementation on the ground actually found instances of individuals who were not readily employable being refused services. xvi The new common measures policies implemented by the Department of Labor in 2006 may exacerbate the existing issues in the performance measurement system because the new method for calculating the earnings measure favors individuals who are more likely to have strong post-program earnings. xvii

Provide dedicated funding and support for successful program models, such as Transitional Jobs, aimed at helping individuals with barriers to employment succeed in the labor market. Congress should make explicit that Transitional Jobs are an allowable activity under WIA and dedicate additional funding to develop and expand these programs.

Rationale: Transitional Jobs programs provide a bridge to unsubsidized employment by combining time-limited subsidized employment with a comprehensive set of services to help participants overcome barriers and build work-related skills. States and localities across the country have implemented transitional jobs programs for populations with barriers to employment, including TANF recipients, homeless individuals, at-risk youth, ex-offenders, refugees and immigrants, and disabled individuals. xviii

Make the workforce system an access point for supportive services and work supports. Congress should require the system to connect individuals with barriers to employment to necessary human service programs to address issues, such as mental health and substance abuse, and connect low-income individuals to supportive services and to work supports, such as food stamps and the Earned Income Tax Credit (EITC)

Rationale: Support services, such as child care and transportation, and proactive and intensive case management, have been shown to support participant persistence in education and training, and success in transitioning into the labor market. Individuals with barriers to employment need holistic service interventions that involve multiple systems to successfully transition into the labor market. Finally, connections to work supports can help low-wage workers retain employment and move out of poverty.

Connect workforce and economic development with the goal of linking low-income individuals and distressed communities with the engines of economic growth. Congress should promote sector-based workforce strategies and other public-private partnerships to expand opportunities for low-income populations and distressed communities. The workforce system should be encouraged to work with employers, preferably on a sectoral basis, to improve workplace practices that help workers and benefit businesses by increasing retention, decreasing absenteeism, and increasing productivity. In addition, Congress should define a role for the WIA system to facilitate the hiring and training of low-income and other targeted populations in conjunction with all legislation to repair the nation’s physical and energy infrastructure and expand transportation systems.

Rationale: Economic and workforce development support each other. Economic growth creates the demand for skills and a more skilled workforce contributes to economic growth; but economic growth without policies to more fairly share the benefits of that growth leave many people behind. While these efforts usually have not had a low-income focus, a number of sector-based workforce initiatives have demonstrated that it is possible to meet employers’ workforce and competitiveness needs and expand opportunities for low-wage workers. The keys to advancing the prospects of low-
Wage workers are reputable workforce intermediaries, which both have this as their mission and a deep understanding of the opportunities and challenges faced by the industries in which they work.\textsuperscript{xix}

**Make employment retention and worker advancement a central part of WIA’s mission** The prevalence of low-wage work means that our nation’s job training system should not only focus on making job placements, but also make retention and advancement a central part of its mission. This will require the system to work on both the supply and demand sides of the labor market. On the supply side, the workforce system should focus on connecting workers and job seekers to good jobs, helping incumbent workers build skills to advance to better jobs, and facilitating the receipt of work supports for low-wage workers that promote attachment to the labor market. Specifically, Congress should require that a portion of incumbent worker training be directed at upgrading the skills of low-wage workers.\textsuperscript{xx} On the demand side, the workforce system should work with employers to improve job quality and to develop workplace practices that support retention and advancement.

**Rationale:** Using public dollars to upgrade the skills of low-wage workers is a necessary complement to private sector investment in training, which tends to be focused on higher-skilled, higher-wage workers. Researchers studying employer-provided training found that “workers with some college were twice as likely as workers with a high school degree or less to receive employer-sponsored training in 1995, and this gap grew somewhat by 2001 as the percentage of workers with high school education or less who received training declined.”\textsuperscript{xxi}

**Preserve youth councils, or an appropriately designated alternate entity, to serve as the focal point for strategic coordination of youth service activity.** Maintain mandatory youth councils; but refocus their role on strategic planning, oversight, and coordination. Provide for the establishment of a youth council—or a committee of the local workforce investment board, or an alternative entity designated by the local elected official(s) in consultation with the board—that consists of experts and stakeholders in the field of youth policy and practice, leadership from key youth serving systems, employers, and youth—to advise on programs, strategies and cross-system alignment to best serve the needs of vulnerable youth in the community.

**Rationale:** The establishment of youth councils under WIA was designed to bring focus and strategic action around youth programming to local areas around the country. This is an important function since the role of focusing priority and coordinating services on behalf of youth, in particular, disadvantaged youth does not by statute rest with any other body. Abandoning this requirement would likely lead to the continued patchwork of fragmented, uncoordinated interventions which fall short of the comprehensiveness and scale necessary to make a difference. Addressing the disconnected youth challenge is beyond the capacity of a single system or program model. It requires attention to amassing multiple resources and to effectively supporting the transitions that these youth must make across multiple systems and into the labor market. A well supported youth council with effective leadership can play that role. Youth councils have been hampered in playing this role, not only because of the continuous retrenchment in federal funding, but because the current WIA statute is overly prescriptive about youth council membership, responsibilities, and authority. Reauthorized legislation should allow local areas the flexibility to configure these items, as appropriate in their areas.

**Require the state and local boards to submit strategic youth plans detailing how multiple systems will engage to provide education, training, and transition support to out-of-school youth and high-risk in-school youth.** As a contingency for receipt of funding, state and local areas should be required to submit plans which identify how the secondary, postsecondary, workforce, juvenile justice, and child
welfare systems will coordinate to advance the education and labor market outcomes of youth in high risk categories – dropouts, foster care, offenders, homeless, and vulnerable in-school youth. This should include at the state level how Governor’s discretionary funds will be used to support this work and what state and local policies will be pursued to promote dropout recovery and effective transition support.

Rationale: With dropout rates exceeding 30% nationally, and 50% for minority youth and youth in high poverty communities, effective recovery and transition interventions are exceedingly important. The WIA system should be playing a pivotal role in high school reform, re-entry, and other reforms of youth serving systems. Since these span all levels of jurisdiction – local, county, and state – WIA reauthorization could greatly enhance the collaboration by requiring the states and local recipients of funding to formally address how these relationships will be formed and how the policies will be addressed.

**Require a greater focus in the formula funding on dropouts and youth in high risk categories.** Require that 50 percent of those served with formula funding be in the high-risk category, to include dropouts along with homeless youth, young offenders, disabled youth, and youth in the foster care system, regardless of their school status. Recalibrate the distribution formula to take into account other youth risk factors like dropout rates.

Rationale: In 2006, only 22.6 percent of youth ages 16 to 21 exiting the WIA system were high school dropouts. Only 8.2% were youth with limited English proficiency and only 8.9 percent were offenders. These numbers suggest that WIA resources are not reaching those youth in greatest need of service. Many reasons account for the low participation – these youth require much more expensive and comprehensive intervention, impact negatively on the performance measures, and outreach is much more difficult. Directing the formula funds to where the need is greatest, requiring a greater share of resources be devoted to this population along with adjustment of performance measures, as mentioned in previous sections, could greatly increase participation of high risk youth in WIA programming.

**Remove the bureaucratic eligibility certification requirements, which deter youth from accessing services and make coordination across systems and funding streams more difficult.** A reauthorized WIA legislation should include ways to target eligible youth for service without the onerous certification requirements that are in present law. Congress should consider allowing eligibility for school lunch program or other means tested programs sufficient for WIA services. Out-of-school youth in certain target groups—dropouts, youth who are in foster care, homeless, runaways, and offenders—should be eligible for service without regard to income.

Rationale: A GAO report to Congress indicates that overly restrictive income requirements and burdensome certification processes have served as barriers to receipt of services for many youth. Many out-of-school youth are in tenuous living situations without easy access to parent or guardian income information. For many out-of-school youth, it is difficult to assemble the necessary papers to document income, residency, welfare status, and other such requirements. For in-school youth, the process can be stigmatizing. Competing eligibility requirements are a daunting challenge to efforts to integrate services across systems, and the process is burdensome for service providers.

**Continue targeted funding to economically distressed communities via YO grants to focus on building comprehensive and integrated youth delivery systems in communities of high youth distress.** Congress both through the reauthorization and appropriations process should reactivate the Youth Opportunity Grant provisions of WIA. There is a critical need to rebuild the capacity and infrastructure
of the youth delivery systems in communities where 50 to 60 percent of youth are dropping out of school and where youth unemployment is at perilous levels. These YO grants should focus on the cross-system and cross sector collaboration to build efforts at scale to put youth back on track to successful education and labor market outcomes. Reauthorized legislation should specify that YO grants are to be targeted to areas of high youth-poverty or dropout rates and equitably distributed among urban, rural, and Native American communities. The legislation should require the Secretary of Labor to consider factors reflecting youth distress when awarding YO grants — such as youth economic distress, dropout rates, youth unemployment, youth poverty, post-secondary attendance rates, and other need-related factors. Applicants for YO grants should be required to identify how the various youth-serving systems will coordinate in the planning and implementation of services under this grant and the specific role that business will play in planning and providing access to work experience, internships, apprenticeships, training, and placement of youth in growing sectors of the regional economy.

Rationale: Youth Opportunity Grants were introduced in the WIA legislation as the vehicle to get the resources to high-poverty communities to build the youth delivery system capacity to address youth challenge at a scale and make a difference in the education and labor market outcomes for the community’s youth as a whole. They were meant to be comprehensive, intensive, and cross system. More than 150 communities applied for grants, with 36 being selected in the initial and only round of awards. These grants were highly successful in building delivery capacity in these communities. However, the level of appropriations was insufficient to allow the continuance of such grants.

More than 90,000 mostly minority youth were enrolled in programs in 36 communities; and 48 percent of these youth were out of school. The programs had tremendous drawing power. The YO communities were particularly successful in making educational connections, post-secondary connections, and short- and long-term placements for these youth. DOL recently released the research findings from the YO evaluation which indicated that these grants achieved unprecedented success in getting youth, particularly out-of-school youth, engaged in youth development activity, reconnected to education, and an increased level of receipt of Pell grants. xxiii Similar findings were documented in a CLASP report, Learning from the Youth Opportunity Experience: Building Delivery Capacity in Distressed Communities. xxiv DOL played a significant role in providing technical assistance, training, including leadership and management training, coaching, and dissemination of best practice. This level of focused energy and support needs to be expanded to address the youth challenge confronting so many communities.

Establish a separate title for work experience and community service. Create a separate title with separate funding stream to increase access to paid work experience opportunities, including summer jobs for 14- to 16-year-old youth, transitional jobs for vulnerable populations such as re-entering offenders, and year-round work experience and service corps programs for out-of-school youth in high-risk categories.

Rationale: In areas of high unemployment and during times of economic recession, youth suffer tremendously in the job market. Studies from Northeastern University’s Center for Labor Market Studies (CLMS) document the ongoing tremendous decline in labor market opportunities for youth to the lowest level of teen employment in 60 years with employment rates for black teens at just 22 percent. xxv Early work experience is critical to the development of work ethic and appropriate workplace skills, and it correlates with higher earnings in later years. A 2006 CLASP report found supported work experience to be a critical component in most of the successful programs for youth returning from confinement. xxvi An Abt evaluation of service corps found higher rates of employment and higher wages for corps participants, especially for minority male participants. It is important to re-introduce actual hands-on
work experience as a tool for imparting workplace skills that cannot be taught in a classroom or workshop setting.

**Comments on Title II**

**What are the Problems with the Current Workforce Investment System?**

The Adult Education and Family Literacy Act (AEFLA, Title II of WIA) is the main source of federal funding for adult education. Federal funding for adult education and literacy services is grossly inadequate considering the need, amounting to less than $500 million annually since 2006 even with waiting lists for adult education and sky-rocketing demand for English language instruction. Although a long term commitment to reinvesting in Title II is needed, an infusion of resources alone will not be enough. The program needs to be transformed in order to better meet the needs of low-literate and low-skill adults and older youth, and to ensure that America has a globally competitive workforce. One problem is that adult education services typically are not aimed at preparing students either for careers or for postsecondary education or training, although a clear majority of students have these goals. Secondly, adult education typically does not coordinate, dual enroll, or align services with postsecondary education and training in the way that the latter increasingly does with high schools. As a result, even adult education students who earn their GEDs generally must enroll in remediation again at the college level, reducing their chances of earning a degree.

**What should be done to address these problems?**

The AEFLA needs to be revised to help many more adults and older youth increase their basic skills and English language proficiency and successfully transition to postsecondary education and training and work that pays family-supporting wages by:

- Increasing funding for adult education to serve more adults and older youth and invest in programs that work;
- Allowing and encouraging blended programs that combine basic skills, English language and occupational education and training to ensure lower-skilled individuals can earn credentials that help them compete for better jobs; and
- Strengthening levers that increase quality.

The following recommendations are intended to update Title II to support state and local innovations in this critical area, which in turn will increase persistence in adult education, increase transitions to postsecondary programs, and help low-income adults attain marketable postsecondary credentials.

**Make postsecondary transitions an adult education goal.** WIA legislation should expand the purpose of Title II to include transitions to postsecondary education and clarify that postsecondary education includes occupational training.
**Rationale:** Two facts about WIA Title II (the Adult Education and Family Literacy Act) have become clear since passage of the Workforce Investment Act (WIA) in 1998:

- When low-skilled individuals increase their basic skills, these higher skills pay off in the labor market in the form of higher employment and earnings.
- These earnings increases are typically modest and fall short of what people need to become self-sufficient, even for adult education participants that earn a GED.xxviii

These facts have led a number of states and localities to focus on increasing transitions from adult education to postsecondary education and training. The early results are quite promising:

- Kentucky has encouraged and supported local efforts to dual enroll students in adult education and college remediation, enabling them to work toward their GED and complete college coursework at the same time. For example, in Jefferson County (Louisville), the adult education program has partnered with the community college and two local universities to jointly enroll over 5,000 students, enabling 88% of them to bypass at least one college developmental education course, saving them time and over $400,000 in tuition costs in 2005-2006 alone. The program retains an impressive 72% of its students.xxix

- Recent research on the Integrated Basic Education and Skills Training (I-BEST) program in Washington State underscores the potential of integrating basic skills and/or ESL and occupational training. I-BEST students earned five times more college credits than traditional ESL students and were 15 times more likely to complete job training than other ABE/ESL students.xxx Further, ESL students in I-BEST classes made the same progress learning English language skills as other ESL students did.xxxi

- Other research suggests that even those who initially have low basic skills can substantially increase their earnings if they do not stop with adult education but go on to postsecondary education and job training.xxxi For example, welfare recipients who attended California community colleges and earned associate degrees found that by the second year out of school, their median annual earnings were four times higher (403 percent) than before they entered training. Earnings increases were highest for those in occupational programs.xxxiii Two independent evaluations of the San Antonio, Texas job training program Project Quest, which provides long-term training in hard-to-fill occupations for those who otherwise would not have the opportunity, found wage gains of between $5,000 and $7,500 a year for program participants.xxxiv

Adult education students benefit greatly from programs such as those in Washington and Kentucky because they can earn marketable postsecondary credentials more quickly and avoid using up their limited student aid and personal resources on tuition for college remediation, accessing free adult education remediation for their coursework below college level. Many more states and localities could follow their example but some are hesitant to do so without clearer guidance in this area from Congress. Currently Title II does not reflect this new consensus on the importance of postsecondary transitions for adult education students, and in fact, there is much confusion in the field as to whether services that promote transitions are encouraged or even allowed under WIA.

**Update definitions to include transitions.** If transitions to postsecondary education and training are to be a purpose of adult education and ESL services, then Title II definitions should reflect that. Specifically, we suggest adding workforce bridge programs and postsecondary transition activities to the definition of adult education and adding definitions for each of these activities.
Clarify that Title II does not bar transition activities. We suggest adding language to clarify that nothing in WIA should be interpreted to prohibit workforce bridge programs or postsecondary transition activities, provided that there are mechanisms in place to allocate Title II resources to these activities in proportion to the amount of adult education content in them. For example, if a program integrates English language and job training services, and half of the program’s content is English language instruction and half of it is job-specific skills training, then Title II funds could support half of the program’s costs.

Rationale: While some states and localities are currently providing workforce bridge programs or postsecondary transition services with Title II funds, there seems to be a common misperception in the field that such services are not allowed under WIA Title II.

Report postsecondary transition rates for all students. We suggest that states report annually on the total number of adult education students that they help transition successfully to postsecondary education or training and to the extent practicable, report on student transitions over time (five years). (For states that can link their adult education and postsecondary education administrative data, this is not a difficult task and states that lack that capability would not be required to do it.) At least initially, this data should not be part of the performance accountability system but simply be information that can be used to improve policies and programs.

Rationale: Currently states only report postsecondary transition rates for students who come into adult education already knowing that they want to go to college or training. This has the effect of making transition rates look much higher than they actually are, as few students enter adult education seeing themselves as college material. It also means that providers do not get credit for one of their most important accomplishments: helping adults gain enough skills and confidence to see that they can succeed as learners and reach higher in their education and career goals.

Reduce the barriers to postsecondary transition by aligning assessments. We suggest that Congress ask the Secretary to convene a group of testing experts and adult education practitioners to align to the greatest extent possible, tests used by colleges to determine readiness for college coursework, remediation needs, and “ability to benefit” for federal student aid purposes, and the basic skills tests used by the adult education provider (tests approved by the U.S. Department of Education for adult education performance accountability purposes); and to allow at least some of the Ability to Benefit assessments, or “crosswalks” between them and adult education tests, to be used for accountability purposes under the adult education National Reporting System for students in workforce bridge programs or postsecondary transition activities.

Rationale: Currently students in workforce bridge or postsecondary transition activities must take these two types of tests both upon entering and exiting a program. In both cases the lists of tests are intended for use with adults who lack a high school diploma or GED but most of the Ability to Benefit tests are not on the list of approved assessments for Title II accountability use. These two sets of different assessments impose a burden of multiple testing on students and providers, and make it more difficult for adult education providers and colleges to work together to prepare adult education students for college without the need for further remediation.

Add workforce bridge and postsecondary transition activities as local activities and as factors to be considered in awarding provider contracts. Under Title II’s local provisions, clarify that workforce
bridge and postsecondary transition activities may be part of the adult education services that local providers choose to offer and require states to take into consideration whether a local provider offers workforce bridge programs or postsecondary transition activities in awarding adult education grants or contracts.

Allow for technical assistance on workforce bridge and postsecondary transition activities. Add these two activities to the list of areas on which the Secretary may provide technical assistance.

Need for Greater Alignment between Workforce Education and Training Programs

Congress encourage stronger connections between the workforce investment and adult education systems, in order to better meet the needs of limited English proficient job seekers and those with basic skills deficiencies. Special attention to fostering closer connection between these programs is warranted since less than 1 percent of exiters from the WIA Title I Adult program were co-enrolled in Adult Education in PY 2006 despite the earlier mentioned research that shows the potential of integrating basic skills instruction with occupational training. In addition, Congress should promote policy alignment across workforce education and training programs using a Career Pathways framework. Career pathways initiatives are emerging as a promising approach to enable low-income and low-skilled youth and adults to gain the skills and acquire the credentials needed for family-supporting jobs. These initiatives connect education and training programs to help all students, including adults, out-of-school youth and high school students, advance in steps from one level of education and training to another. Ideally, pathways should begin at the lowest literacy and English language levels and extend all the way through two-year and four-year college degrees, and include comprehensive services to support student success. To this end, Congress should work with the Administration to initiate a review of the legislative and administrative changes needed to align federal policies and program requirements across workforce development, adult education, career and technical education, and postsecondary education and training systems to make it easier for states and local institutions to develop and fund career pathways.

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2 Local areas report on WIA program exiters to states, and states then report this information to the federal government through the Workforce Investment Act Title I-B Standardized Record Data (WIASRD) tool. The data reported through the WIASRD provides demographic information and information about the types of services individuals who have exited from the WIA Youth, Dislocated Worker and Adult program received. The Department of Labor (DOL) makes this information available through the WIASRD data books, prepared by Social Policy Research Associates. The Government Accountability Office (GAO) and the DOL Office of Inspector General have both raised concerns about the completeness and accuracy of the WIASRD data. Despite our concerns about the WIASRD data, it is the only available national data source for demographic information about WIA exiters.


ix Illinois State WIB requirement that 40 percent of WIA funds are spent on training: Illinois Department of Commerce and Economic Opportunity. WIA POLICY LETTER NO. 07-PL-40. November 2007. Available at: 

Legislative language from Florida requiring that 50 percent of funds are reserved for ITAs: The 2000 Florida Statutes Chapter 445 Workforce Innovation 445.003 (3)(a)(1). Available at: 
http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=Ch0445/SEC003


xi The GAO study defines available funds as the combined amount of program year 2003 funds and funds carried over from program year 2002. Government Accountability Office, Substantial Funds Are Used for Training, but Little is Known Nationally about Training Outcomes, 2005.

xii PL 105-220 Section 134 (d)(4)(E).

xiii PL 105-220 Section 134 (d)(4)(E).

xiv Women Employed with Chicago Jobs Council and UIUC Great Cities Institute. Bridges to Careers for Low-Skilled Adults. Women Employed Institute, 2005. Available at: 


xvii In 2006, DOL issued guidance which required states to adopt the new “common measures” performance policy which significantly changed existing performance requirements. The common measures policy requires states to calculate the Adult earnings gain performance measure in a new way. Instead of using pre-program earnings in the calculation, states now use the average earnings achieved over a 6-month period following program participation. While the full impact that this will have on programs is yet to be seen, it is fair to assume that it may further push programs away from serving individuals who are not working and have little work history or earning potential, since the pre-post calculation of earnings provided programs with an incentive to serve this population. The common measures were implemented through the Training and Employment Guidance Letter 17-05.


xviii Allegre Baider and Abbey Frank, Transitional Jobs: Helping TANF Recipients With Barriers to Work Succeed in the Labor Market. Center for Law and Social Policy, 2006. Available at: 
is available through the National Transitional Jobs Network (www-transitionaljobs.net), a coalition of transitional jobs programs, policy organizations, and other sponsoring organizations that helps to develop and expand transitional jobs programs nationwide.


Duke et al., Wising Up.


http://www.nyec.org/content/documents/collapse_2008_summer_teen_job_market.pdf


February 2007 email correspondence with Trish Schneider, Coordinator, Jefferson County Public Schools Adult and Continuing Education.


The “Ability to Benefit” provision of the Higher Education Act allows individuals without a high school diploma or GED to qualify for student aid if they can achieve a passing score on an approved test to demonstrate their ability to benefit from postsecondary education. The Department of Education issues a list of approved tests and passing scores for colleges to choose from for this purpose.