



January 27, 2012

To: strategicplancomments@ed.gov

Dear Secretary Duncan,

Thank you for the opportunity to comment on the Department of Education's Strategic Plan for FY2011 – 2014. We appreciate and support your work to improve education and career prospects for adults and out-of-school youth and are generally very pleased with the Department's strategic plan for FY2011 – 2014.

CLASP is a nonprofit organization that develops and advocates for policies at the federal, state and local levels that improve the lives of low-income people. As part of CLASP's Center for Postsecondary and Economic Success, we specifically focus on policies that help low-income students access and succeed in postsecondary education and advance in their careers, including nontraditional students such as working adults and out-of-school youth. We therefore approach our comments through the lens of ensuring that these critical populations remain front and center in the Administration's near-term goals.

We applaud the Department for putting forth a strategic plan that raises expectations for our nation's education system at all levels toward meeting the goal of having the highest proportion of college graduates in the world by 2020. This goal is ambitious and will require engaging students and potential students at all age and skill-levels, including out-of-school youth, and low-income and low-skilled adults.

Specifically, we commend the following components of the plan:

- Promotion of career pathways for adults and out-of-school youth as a strategy to increase the percentage of Americans with a postsecondary credential and help low-skilled workers upgrade their skills and transition to postsecondary education or training.
- Strong focus given to the importance of improving access to and success in postsecondary education for adult learners and non-traditional students.
- Recognition of the importance of working across federal agencies to achieve our nation's competitiveness goals, including a mention of workforce development services in the goals to improve and align data systems.
- Support for multiple approaches to research and evaluation, particularly those holistic approaches that do not lend themselves to methodologies such as random assignment but can be effectively studied with quasi-experimental approaches.
- Increased attention and strategic focus on supporting states and districts in turning around the nation's persistently lowest-achieving schools.
- Increased focus on addressing the issues of educational equity among youth of color, particularly at the secondary and postsecondary education levels.

We hope that our comments below are useful to the Department as it continues its strategic planning process.

Sincerely,

The Center for Law and Social Policy

CLASP Comments on Department of Education Strategic Plan FY2011 - 2014

Goal #1: Postsecondary Education, Career-Technical Education, and Adult Education. Increase college access, quality, and completion by improving higher education and lifelong learning opportunities for youth and adults.

1. **Recommendation:** Be more explicit about the role of the adult education system as a vehicle for postsecondary access and success. Raise the bar for adult education so that it is not simply a vehicle for students to obtain a GED, but also promotes postsecondary and career success.

Nearly fifteen percent of U.S. adults lack a high school diploma or GED in a time when the nation's need for a more education workforce is greater than ever.¹ To ensure that our nation rises to the task of developing a skilled workforce that meets the demands of employers, policymakers need to widen their focus to expanding education and training to lower-skilled adults and youth, including high school dropouts, adults who have a high school diploma or GED but are not college ready, and adults with low English proficiency. Without a targeted strategy to educate more low-skilled Americans, the U.S. will continue to lag behind in measures of educational attainment and hence in economic competitiveness.

Specific areas of the strategic plan that could be modified to reflect this priority:

(Page 1) Message from the Secretary: The Message from Secretary Duncan includes no mention of ensuring that adult students who do not have a high school diploma or are not already English proficient succeed in postsecondary education and build their skills to a level that can help them to compete for jobs in today's labor market. Subsequent plan details include helpful action steps to assist this population in attaining high school and postsecondary credentials; therefore, it should be reflected in the Secretary's message as well.

(Page 5) National Outcome Goals: The stated National Outcome Goal for Goal #1 around adult education is "*to increase the number and percentage of adult education students obtaining a high school credential.*" The Department should also measure the increase in number and percentage of adult education students who transition to postsecondary education and/or workforce training and who earn postsecondary credentials. Also, the baseline data provided on page six is misleading—it is described as the percentage of adult education students earning a high school credential when in fact it is only the percentage of adult education students reported by states to have set high school completion as their goal and then achieved it.

The actual percentage of all adult education students earning a high school credential is far lower; for example, in 2010-2011 the total earning a high school credential represented about 8% of all adult education students (about 164,886 out of two million students served). The total entering postsecondary education or training represented about 2.6 percent of all adult education students (about 53,718 out of two million students served).

(Page 12) Goal 1: Indicators of Success: Adult education students and the programs that serve them need to be held to high college- and career-readiness standards just as secondary students and the programs that serve them are. We recommend adding an indicator that would track progress toward ensuring that more low-skilled adults transitioned to and completed postsecondary education and/or workforce training. We also recommend that the fourth bullet on state plans explicitly mention that state plans must include a focus on adult and nontraditional students as well as traditional students.

¹ U.S. Census Bureau, *2008-2010 American Community Survey 3-Year Estimates*.

(Page 13-14) Sub-Goal 1.1: Access - Actions/Means: The actions and examples listed here mention career pathways for adults as a strategy for reaching this sub-goal. We support that action and think this idea should be extended to encompass the promotion of basic skills and English language services tailored to career pathways as on-ramps into postsecondary education for underrepresented populations, such as at risk youth, immigrants, displaced workers and others.

(Page 15) Sub-Goal 1.2: Quality: The Department should include adult education in discussing the strengthening of data systems at the bottom of the first paragraph and the top of the second.

2. **Recommendation:** Recognize the wide variety of postsecondary credentials with value in the labor market, not just two- and four-year degrees.

While some areas of the strategic plan (Sub Goal 1.3) refer to the Department’s plan to increase access to and success in certificate-level programs, these types of credentials are not included in the outcome goals that define the success in programs and attainment of this goal.

In some industries, licensures and longer-term certificates can be as valuable to employers as a two- or four-year degree. In fact, 43 percent of licenses and certificates earn more than an Associate's degree, 27 percent of licenses and certificates earn more than a Bachelor's degree, and 31 percent of Associate's degrees earn more than a Bachelor's degree.² Research by the Community College Research Center and Complete College America/FutureWorks confirms that certificates longer than one-year tend to have significant labor market value.³

Greater national attention is also turning to the use of a career pathway framework to ensure that more low-skilled adults earn postsecondary credentials and are well-connected to jobs in their local economy. Adult career pathways are linked education and training services that “enable students, often while they are working, to advance over time to successively higher levels of education and employment in a given industry or occupational sector.”⁴ These models often use “stackable” or “chunked” credentials that may include several short- or long-term certificates that can be built upon toward a two- or four-year degree.

Specific area of the strategic plan that could be modified to reflect this priority:

(Page 5) National Outcome Goals: The National Outcome Goals for Goal #1 include increasing the attainment of an associate’s degree or higher by 25-34 year olds. This could be modified to include certificates of one-year or longer.

3. **Recommendation:** Promote the alignment of adult education with other education and training systems on the state- and local-levels by taking coordinated cross-system actions at the federal level.

The task of improving the skills of our nation’s workforce is too great for one system to take on alone. Through partnerships among workforce training, higher education, adult education, community-based organizations, employers, and others, the Department can support the development of pathways to postsecondary credentials and better jobs for the millions of low-skilled adults and youth for whom a

² Anthony P. Carnevale, Nicole Smith, and Jeff Strohl, [Help Wanted: Projections of Jobs and Education Requirements Through 2018](#), Georgetown Center on Education and the Workforce, June 2010.

³ Complete College America, [Certificates Count: An Analysis of Sub-baccalaureate Certificates](#) (December 2010)

⁴ Oregon Career Pathways Initiative.

skilled job is out of reach. Broad-based partnerships are noted on page 47 in the last paragraph; however, other areas of the plan could better reflect such partnerships.

Specific areas of the strategic plan that could be modified to reflect this priority:

(Page 13) Sub-Goal 1.1: Access – Actions/Means: The Department currently states in the fourth bullet that they will build the capacity to link postsecondary education more closely with elementary and secondary schools, businesses, government, and labor to meet workforce needs. This bullet should also encourage data linkages between the workforce system and adult education as well as community organizations.

4. **Recommendation:** Promote college affordability and strengthen student financial aid equally for low-income working students and low-income traditional students.

Eroding college affordability is as significant a challenge for low-income working students as it is for more traditional low-income students; however, this population often is overlooked simply because they appear to be “workers” rather than “students.” In order to “*ensure that all children and adults in America receive a world-class education*” per the Secretary’s message and meet the President’s goal that every American commit to at least one year of higher education or career training, we must ensure that low-income working students have equal access to student financial aid. This recommendation also supports Goal #4 on equity of educational opportunities based on age.

Specific area of the plan that could be modified to reflect this priority:

(Page 13) Sub-Goal 1.1: Access – Actions/Means: The Department currently states that it will protect the maximum Pell Grant award of \$5,550. This bullet should also include a statement protecting low-income students from harmful eligibility changes that will reduce or eliminate their student aid. An additional bullet should be added that the Department will educate and encourage states and institutions to leverage other sources beyond federal student financial aid to help students cover net tuition and unmet need, e.g., institutional aid, workforce funds, and supportive services.

Goal #2: Elementary and Secondary. Prepare all elementary and secondary students for college and careers by improving the education system’s ability to consistently deliver excellent classroom instruction with rigorous academic standards while providing effective support services.

1. **Recommendation:** Prioritize and ensure education options, including dropout recovery strategies, for high school dropouts and highly vulnerable high school students.

The recovery of high school dropouts must be a central component to any serious systemic approach to education reform. One in three youth—and more than 50 percent of minority youth and youth in high poverty urban and rural communities—who start high school will not graduate four years later. There are 6.7 million young people in this nation that are disconnected from school and work. Of that number, 3.4 million are chronic, defined as never in school or work after 16 years of age and 3.3 million are under-attached, defined as a lack of progression through college or into a job.⁵ Intentional recovery options and

⁵ http://www.americaspromise.org/News-and-Events/News-and-Features/2012-News/January/~/_media/Files/Resources/Youth%20Factsheet%201-2-12%20FINAL.ashx

systems of support, especially those in communities of high youth distress, are particularly important as state and local school districts move toward increasing graduation rates and preparing increasing numbers of students for postsecondary and career success. As the percentage of jobs requiring a postsecondary credential is predicted to increase in the future, keeping students on track to graduate and re-engaging those that have dropped out is essential to the future survival of the American economy.

Specific areas of the strategic plan that could be modified to reflect this priority:

(Pages 27-28) Sub-Goal 2.4: Struggling Schools. Support states and districts in turning around the nation's persistently lowest-achieving schools.

- Encourage state and local policies that develop and expand multiple pathways towards high school completion, with an emphasis on dropout recovery and reengagement strategies, such as credit-recovery, high quality alternative programs or charter schools, credits earned based on demonstrated competency instead of seat time, applied learning approaches, accelerated learning models, concurrent enrollment in high school and community college, school/work models in partnership with workforce investment boards, and GED Plus/Diploma Plus models.
 - Encourage collaboration between LEAs and local community-based agencies to provide comprehensive services to dropouts who are being reengaged, such as transportation, mental health supports, child care, social services, etc.
 - Recommend that states and LEAs make efforts to establish “horizontal alignment” with all other youth-serving systems (i.e. workforce investment boards, juvenile justice, child welfare, Temporary Assistance to Needy Families) to support the educational needs of dropouts and those at risk for dropping out.
 - Fund a diverse set of multiple pathway strategies through federal discretionary funding streams and provide incentive for states and LEAs to develop education options for struggling students and high school dropouts in high poverty districts.
 - Fund state and district level efforts to develop dropout recovery systems that are connected to other youth- serving systems, workforce, child welfare, and juvenile justice.
 - Fund and encourage states and districts to provide appropriate wrap-around services in partnership with community-based organizations and other youth systems that support graduation attainment for high school students.
2. **Recommendation:** Expand dropout prevention strategies and efforts targeted at the middle and high school grades in low-income and high minority school districts.

Although data reveal most students do not drop out until high school, warning signs are evident in the middle school years. Research demonstrates several predictors of eventual high school dropout, including chronic absenteeism, behavioral issues, and course failure.⁶ Students who have been involved with the juvenile justice and child welfare systems are particularly vulnerable and more likely to drop out of high school. These students often lose large amounts of instructional time and fall far behind.

⁶ <http://www.tcrecord.org/Content.asp?ContentID=10825>

Specific areas of the strategic plan that could be modified to reflect this priority:

(Page 27) Sub-Goal 2.4: Struggling Schools. Support states and districts in turning around the nation's persistently lowest-achieving schools.

- Fund early identification and intervention approaches that work with students in middle schools that feed into high schools with low graduation rates.
- Provide incentives that enable all states to design an early warning system to identify students in danger of dropping out of school, and enable LEAs to implement early intervention strategies to support students before they drop out of school.

Goal #4: Equity. Ensure effective educational opportunities for all students regardless of race, ethnicity, national origin, age, sex, disability, language, and socioeconomic status.

1. **Recommendation:** Include an indicator and action steps to focus on equitable opportunities to education and credentials for adult students.

Adult students will be critical to meeting the President's goals of having the highest proportion of college graduates in the world and that every American will commit to at least one year of higher education or career training. However, for too long, postsecondary education has been biased toward traditional students. We are impressed with the Department's inclusion of adult students in Goal 1 (and Goal 5?) of this strategic plan and encourage the Department to include a focus on these students – especially low-income adult students – in Goal #4 on Equity. This is appropriate since the equity goal includes “age.”

Specific area of the plan that could be modified to reflect this priority:

(Page 40-41) Indicators of Success: Increase the number of high-quality credential programs that show success for low-income adult students and increase college affordability for low-income adult students. This indicator or a similar one would also be referenced in the Goal related to Postsecondary Education, Career-Technical Education, and Adult Education.

2. **Recommendation:** Strengthen the proposed action that currently says, “*encourage a focus on equity and high-need students in the Department's competitive and formula grant programs.*” In both competitive and formula grant applications, states and districts should be required to include an analysis of how their educational programs will specifically impact equity issues during the grant period, and set a concrete goal upon which they can be measured. Failure to do so should result in lower points for an application or lack of funding.

The issue of equity is one that will require bold strategies and requirements. Simply encouraging a focus on the issue will not yield the level of proactive action on the part of states and districts.

Specific areas of the strategic plan that could be modified to reflect this priority:

(Page 43) Sub-Goal 4.1: Continue to increase the infusion of equity throughout the Department's programs and activities. Promote and coordinate equity-focused efforts in Departmental programs. The Department should fund and require states and districts through competitive and formula grant applications to include an analysis of how their educational programs will specifically impact equity issues during the grant period, and set a concrete goal upon which they can be measured.

3. **Recommendation:** In the list of priority issues to be addressed by the Office of Civil Rights, include the following: *"Disproportionate numbers of minority students excluded from gifted education."*

While promoting equal access to rigorous courses and curricula ensures that more college-preparatory and STEM classes are available in a school, it does not ensure that minority students will be encouraged or allowed to enroll in those courses. The Department's Office of Civil Rights data documents the wide disparity in students of color participating in gifted and talented programs in their schools. The placement of students into gifted and talented education is a highly subjective process wherein teachers often use non-academic determinants to exclude minority students, particularly males. Lack of cultural competence often leads teachers to the erroneous assumption that minority students would be disruptive or otherwise unsuccessful in gifted and talented education programs. This failure often leads to minority students graduating from high school ill-prepared for postsecondary opportunities or the world of work.

Specific areas of the strategic plan that could be modified to reflect this priority:

(Page 45) Sub-Goal 4.2: Civil rights enforcement. Ensure equal access to education and promote educational excellence throughout the nation through the vigorous enforcement of civil rights laws. We recommend adding "Disproportionate numbers of minority students excluded from gifted education" to the priorities to be addressed by the Office of Civil Rights.

Goal #5: Continuous Improvement of the U.S. Education System. Improve the organizational capacities of the Department to implement this Strategic Plan.

1. **Recommendation:** Ensure that new technologies developed to create efficiencies in education are designed to accommodate the unique needs of adult learners with a focus on maintaining high quality programming that helps adult learners complete adult education and postsecondary education programs.

Little exploration or research has been done on the effectiveness of online learning for adults at lower skill levels. The studies that have been completed mainly focus on success (measured by GPA) and completion of a specific course compared to a similar classroom-based course. The majority of these studies tested the effectiveness of these online courses at four-year universities, not community colleges.

A recent review of literature from the Community College Research Center shows that existing online coursework may "hinder progression for low-income and underprepared students."⁷ This same paper suggests that policies and practices such as offering low-cost computers and high-speed Internet to students and providing integrated and high-quality supports into the online course management system, among other strategies, may improve the effectiveness among low-income and underprepared students. However, much research still needs to be done in this area.

Specific areas of the strategic plan that could be modified to reflect this priority:

(Page 48) Goal 5: Indicators of Success: Bullet six on "increasing the percentage of teachers, administrators, and parents who believe in the effective implementation of technology" should include "students," or, at a minimum, "adult students." Successful adoption of instructional technologies will

⁷ Smith, Shanna Jaggars. *Online Learning: Does It Help Low-Income and Underprepared Students?* Community College Research Center, January 2011.

depend on the students being comfortable with the technology and using it; they are an important audience for this goal.

(Page 55) Sub-Goal 5.4: Technology and Innovation: Include language that focuses on meeting the unique needs of adult learners in the development of new technologies, distance education tools, and technology-based resources.

2. **Recommendation:** Include adult education in state longitudinal data system goals.

(Page 48) Goal 5: Indicators of Success: In the Department's measure of the number of states with longitudinal data systems connecting elementary, secondary, and higher education data, at minimum, the Department should include adult education as well.

Given the aging of our population, adults will inevitably become an increasingly important group for postsecondary institutions to serve if we are to reach national postsecondary credential completion goals. State data systems should support this goal by tracking adult learner progress through adult basic and secondary education and through English language services into postsecondary institutions. This data is critical for helping adult education systems and postsecondary institutions determine how well they are serving adults and taking steps to improve their performance.