

# CLASP

Policy solutions that work for low-income people

November 13, 2017

U.S. Secretary of Education Betsy DeVos  
U.S. Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

Thank you for the opportunity to comment on the Secretary's proposed supplemental priorities and definitions for U.S. Department of Education (ED) discretionary grant programs, posted in the Federal Register under Docket No ED-2017-OS-0078.

The Center for Law and Social Policy (CLASP) is an anti-poverty nonprofit organization. We advocate for policies that improve low-income families' economic security. CLASP's Center for Postsecondary and Economic Success (CPES) seeks postsecondary and workforce policy reforms that create pathways to education and employment.

CPES advocates for low-income and nontraditional students, such as adults with basic skills, adults returning to college after time away, and students who are working and/or parenting while in college. We believe these students' needs should be addressed wherever possible in federal policy discussions. Our comments on the proposed priorities reflect our deep interest in these populations.

## ***Proposed Priority 1 – Empowering Families to Choose a High-Quality Education that Meets Their Child's Unique Needs***

We have several recommendations related to this priority. First, we support including the Workforce Innovation and Opportunity Act (WIOA) section 203(7) definition of "English language learner" in subsection (b)(iii). This will promote inclusive strategies and service delivery to out-of-school youth and adults who need basic and secondary skills through the Adult Education and Family Literacy Act, WIOA Title II.

Second, in subsection (vi), we recommend adding the WIOA section 129(a)(1)(B) definition for "out-of-school youth" to the "disconnected youth" definition<sup>1</sup> from the Higher Education Act (HEA). The WIOA definition is more up to date and inclusive of the unique circumstances of youth who are disconnected from the traditional K-12 experience.

Third, in subsection (viii), we recommend adding the WIOA section 3(5) definition for "basic skills deficient" to the "low-skilled adults" definition from the HEA. The WIOA definition is more up to date and inclusive of the unique circumstances of youth and adults who find their foundational skills are inadequate to the demands of their regional labor market, the demands of being a family member, and the demands of being an involved member of their communities.

Finally, we applaud the language in subsections (xi) through (xiii). Acknowledging “children or students” rightly includes the many adults who fit these need categories while involved in adult education and family literacy activities or postsecondary education. Consistent with that language, we encourage you to reconsider the priority title, given it is not well-aligned with some of the sub-priorities that acknowledge that: (1) youth and adults also deserve and seek a high-quality education that meets their needs; and (2) these individuals may also have control to choose an adult or postsecondary education provider, which may include an adult charter school.

### ***Proposed Priority 2 – Promoting Innovation and Efficiency, Streamlining Education with an Increased Focus on Improving Student Outcomes, and Providing Increased Value to Students and Taxpayers***

The Office of Career Technical and Adult Education could significantly meet the proposal listed in sub-priority (c) and build efficiency and effectiveness of state and local adult education programs by eliminating the duplicative and inconsistent National Reporting System (NRS).

State agencies receiving WIOA Title II funds will report annually on a shared reporting template<sup>1</sup> with the other WIOA titles. The NRS is a legacy data collection system, initiated in the 1990s, that limits adult educators’ ability to truly show the impact on students’ lives through the full complement of WIOA Measurable Skill Gains. Additionally, the NRS definitions (for example, on the Measureable Skill Gain performance metric) directly conflict with WIOA reporting. This causes confusion and reduced data quality.

We aren’t aware of an existing discretionary grant program that would require grantees to submit data via NRS. However, if a future grant initiative designed around integrated education and training or another adult education strategy (for instance, an initiative where adults would be co-enrolled in adult education and postsecondary), the tensions described above would come to fruition.

### ***Proposed Priority 3 – Fostering Flexible and Affordable Paths to Obtaining Knowledge and Skills***

Recognizing that a stable job with a family-supporting wage is one of the few pathways out of poverty, we support the vision of this priority: “To meet these [current global] challenges, schools must better equip students with the skills or knowledge required by employers, particularly employment in in-demand industry sectors or occupations, and recognized postsecondary credentials need to be developed that focus on the career and technical skills needed for in-demand industry sectors or occupations, and recognized postsecondary credentials need to be developed that focus on the career and technical skills needed for in-demand industry sectors or occupations (as defined in section 3(23)(A) of the Workforce Innovation Opportunity Act of 2014).”

We agree that these credentials “should serve to define, measure, and communicate the skills students will need to be successful in workplaces” and suggest referencing the recognized postsecondary credential definition from WIOA section 3(52) in this background statement as it is later referenced in (b). This guidance will give educators and their partners the flexibility to deliver the most relevant, valued credentials to their students.

Further, we applaud sub-priority (a), which is focused on improving employer-educator collaboration. Leveraging WIOA industry sector partnerships with Perkins Career and Technical Education employer advisories is a proven strategy for building regional partnerships with employers to support education and career goals.

We strongly support the priority for building career pathways articulated in sub-priority (b) and the recognition that a variety of providers can partner together to create these pathways. Sub-priority (d) includes (and cites) the “career pathway” definition from WIOA. This is a great sign that ED values the work of educators and their partners who, for more than a decade, have been building career pathway programs that utilize both federal and state funds and philanthropic investment. Additionally, we ask ED to reference the HEA<sup>2</sup> here, as WIOA and HEA share the same career pathway definition. This would allow partners to build pathways that include both secondary and postsecondary credentials.

### ***Proposed Priority 4 – Fostering Knowledge and Promising the Development of Skills that Prepare Students to be Informed, Thoughtful, and Productive Individuals and Citizens***

We applaud the inclusion of these types of essential skills in the agency’s priorities: employability skills, determination, perseverance and earned success, and social skills. We urge ED to expand the background discussion on children’s skill needs as demonstrated by the Program for International Student Assessment (PISA) to include the skill needs of the 36 million older youth and adults who lack literacy, numeracy, and problem solving in technology rich environments, as documented in the Programme for the International Assessment of Adult Competencies (PIAAC)<sup>3</sup>.

### ***Proposed Priority 6 – Promoting Science, Technology, Engineering, and Math (STEM) Education, With a Particular Focus on Computer Science***

We support the programs prioritized and the reference to both “recognized postsecondary credentials” (WIOA 3(52)) and the “in-demand industry sectors or occupations (as defined in section 3(23)(A) of WIOA.” This will allow educators and workforce development partners to develop more efficient, effective services for all students.

### ***Proposed Priority 7 – Promoting Literacy***

We believe the data about inequitable educational outcomes for Black and Hispanic elementary students is vital context for this and future discussions about educational programs and supports for all U.S. students. However, we think the background discussion would be even more informative if it included data on the lack of secondary and postsecondary educational attainment. Communities of color and Native Americans are overrepresented in categories of foundational skill needs.<sup>4</sup> Consequently, they need access to proven adult basic education models. Additionally, BA credential attainment among low-income students remains at a dismal 9 percent, up from 6 percent in 1970. For high-income students, the rate of achievement has nearly doubled from 40 percent to 77 percent. If there is a role for the federal government in education, it is surely to reduce these inequities and build the future of all students in support of their families, communities, and nation.

Further, we are grateful for the reference to “integrated literacy instruction into content-area teaching” and strongly urge ED to include a reference to the proven Integrated Education and Training model defined in OVAE Program Memorandum FY 2010-02<sup>6</sup> and in the “integrated education and training” definition included in WIOA Section 203(11).

As to sub-priority (b), we are encouraged by the inclusion of “family literacy activities (as defined in section 203(9) of the Workforce Innovation and Opportunity Act of 2014.” Two-generational strategies, such as family literacy, are key to disrupting the intergenerational poverty that results from low-skilled parents and caregivers.<sup>7</sup>

## ***Proposed Priority 8 – Promoting Effective Instruction in Classrooms and Schools***

We support the proposed sub-priority (a) “Developing new career pathways for effective educators to assume leadership roles with the option to maintain instructional responsibilities and direct interaction with students” as a means of keeping administrators close to the ground with students in order to design effective instruction to meet their differentiated needs and the needs of their communities.

## ***Proposed Priority 9 – Promoting Economic Opportunity***

We applaud your recognition of the “non-academic factors that contribute to academic success” and the emphasis of this priority to support “pathways out of poverty.” We strongly agree “the Department can more effectively use its resources to support students (and their families) so that they have all of the tools they need to be successful in the classroom and beyond.”

We unequivocally support the priority’s on “projects that are designed to reduce academic and non-academic barriers to economic mobility.” Further, we believe that sub-priority (a) “Aligning Federal, state and/or local funding streams to promote economic mobility of low-income parents and children” is a main concern for individuals and their communities. We encourage the Interagency Working Group on Career Pathways, which includes 12 federal agencies, to consider including this priority in their goals as well.

CLASP advocates on behalf of low-skilled adults lacking their high school diploma or its recognized equivalent. Thus, we believe sub-priority (c) “Creating or supporting alternative pathways to a regular high school diploma ... and/or recognized postsecondary credentials” is significant. We applaud ED’s commitment to supporting equitable career pathways for all students with foundational and occupational skill needs.

And we agree that sub-priority (e) “Creating or expanding partnerships between schools, LEAs, and/or SEAs and community-based organizations to provide supports and services to students and families” is an evidence-based strategy that leverages partnerships to mitigate the non-academic barriers that stop students from achieving their potential.<sup>8</sup>

However, we would like to address the background section, where ED says it can help coordinate “federal, state, local, and—most of all—private efforts to solve the challenges of poverty.” We do believe that everyone should be engaged in ending poverty. However, But philanthropy alone (or even as a majority operator in the fight) cannot solve poverty. Government funding and initiatives are absolutely necessary.

ED needs adequate staffing in order to properly implement these priorities and give appropriate support to the initiatives that underlie them. When James Runcie resigned from his position as chief operating officer of federal student aid earlier this year, he cited constraints on staff, resources, and the decision making authority needed to appropriately execute FSA’s mission.<sup>9</sup> And just last month, the Washington Post reported buy-outs had been offered to FSA employees. It is possible buy-outs have been offered to employees in other departments, as well.<sup>10</sup> Priorities are meaningless without the staff and resources to implement them. A strong federal workforce is vital to support the priorities and goals of ED and its fellow agencies.

We appreciate the opportunity to comment. Please contact Judy Mortrude at [jmortrude@clasp.org](mailto:jmortrude@clasp.org) or Lauren Walizer at [lwalizer@clasp.org](mailto:lwalizer@clasp.org) with any questions.

Sincerely,

Judy Mortrude

Lauren Walizer

## Endnotes

<sup>1</sup> “WIOA Statewide and Local Performance Report Template,” June 2016.

<https://www.doleta.gov/performance/pfdocs/ETA-9169-WIOA-State-and-Performance-Report-Template.pdf>

<sup>2</sup> 20 U.S.C. 1091(d)(2)

<sup>3</sup> *Skills of U.S. Unemployed, Young, and Older Adults in Sharper Focus*, U.S. Department of Education, 2016.

<https://nces.ed.gov/pubs2016/2016039rev.pdf>

<sup>4</sup> *Literacy, Numeracy, and Problem Solving in Technology-Rich Environments Among U.S. Adults*, U.S. Department of Education, 2014. <https://nces.ed.gov/pubs2014/2014008.pdf>

<sup>5</sup> Pell Institute for the Study of Opportunity, 2015

<sup>6</sup> “Use of Funds Provided Under the Adult Education and Family Literacy Act (AEFLA) for Integrated Education and Training,” U.S. Department of Education, 2010. <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/aepla-funds-for-iet.pdf>

<sup>7</sup> “Why is Family Literacy Important?,” Kent State University. <http://literacy.kent.edu/familyliteracy/importance.html>

<sup>8</sup> *Supportive Services in Workforce Development Programs*, Institute for Women’s Policy Research, 2016.

<https://iwpr.org/publications/supportive-services-in-workforce-development-programs-administrator-perspectives-on-availability-and-unmet-needs/>

<sup>9</sup> Danielle Douglas-Gabriel, “Federal student aid chief quits, warning of management issues under DeVos,” The Washington Post, May 2017. [https://www.washingtonpost.com/news/grade-point/wp/2017/05/24/federal-student-aid-chief-quits-warning-of-management-issues-under-devos/?utm\\_term=.8443c2b5f61f](https://www.washingtonpost.com/news/grade-point/wp/2017/05/24/federal-student-aid-chief-quits-warning-of-management-issues-under-devos/?utm_term=.8443c2b5f61f)

<sup>10</sup> Danielle Douglas-Gabriel, “DeVos offers buyout to shrink Education Department workforce,” The Washington Post, October 2017. [https://www.washingtonpost.com/news/grade-point/wp/2017/10/27/devos-offers-buyouts-to-shrink-education-department-workforce/?utm\\_term=.aded14f2196](https://www.washingtonpost.com/news/grade-point/wp/2017/10/27/devos-offers-buyouts-to-shrink-education-department-workforce/?utm_term=.aded14f2196)