



9 April 2021

Senator Patty Murray, Chair
Senator Richard Burr, Ranking Member
U.S. Senate Committee on Health, Education, Labor & Pensions
428 Senate Dirksen Office Building
Washington, DC 20510

Re: Request for comment on workforce development and WIOA programs

Dear Chair Murray and Ranking Member Burr:

The National Coalition for Literacy (NCL) appreciates the opportunity to provide comments to the Senate HELP Committee in response to the Committee's request for input on improvements to workforce training in relation to the COVID-19 pandemic and economic recovery and reforms to programs authorized under the Workforce Innovation and Opportunity Act. NCL is an alliance of the leading national and regional organizations dedicated to advancing adult education, family literacy, and English language acquisition in the United States. NCL serves as an authoritative resource on national adult education issues, envisioning a nation in which all adults are able to fulfill their potential and meet their goals through access to high quality adult education and literacy services provided by an integrated and well-developed system. The programs authorized under WIOA and related job training issues are central to NCL's purview.

The comments provided below focus primarily on the Adult Education and Family Literacy Act (AEFLA--Title 2 of WIOA) and its relationships with the other WIOA titles and the WIOA legislation as a whole. We believe that WIOA reauthorization presents opportunities for improving the legislation so that it more fully realizes its essential purpose of ensuring equitable access to quality education and training for all adults. To that end, we begin with three overarching comments, the first two on perspective and the third on language. We then provide three further recommendations related to specific aspects of the WIOA legislation.

Point 1. Recognize the centrality of adult basic education to the success of workforce training and economic recovery efforts

The HELP Committee request focuses specifically on workforce training, but if the federal effort to address the economic and social effects of the COVID-19 pandemic is to include all individuals in American society, it must also open opportunities for those adults who are not yet ready to participate fully in postsecondary credentialing and education programs. That is, it must include **adult basic education**, the main focus of AEFLA, which gives adults and youths ages 16 and older essential skills in literacy, numeracy, English language acquisition, and digital technology use within the context of high school equivalency, workforce preparation, family literacy, and transition-to-employment and postsecondary education programming (Minnesota State, 2020; OCTAE, 2020; Open Door Collective, 2020).

In the United States, 19 percent of adults are profoundly in need of literacy skills development and 29 percent lack critical numeracy skills (NCES, 2018). These adults are overrepresented in communities of color—the same communities that have been most adversely affected by the COVID-induced health and economic challenges that are rooted in systemic inequity. They are also those whose livelihoods are most threatened; the U.S. Bureau of Labor Statistics analysis of future job growth indicates that anticipated job growth for those with a high school diploma or less is 0% to -2.3% while all other education levels show positive growth (Kolko, 2021).

Adult basic education can make a transformative difference for these adults. Participants in adult education programs are 35 percent more likely to obtain a high school equivalency than nonparticipants, and are considerably more likely to enroll and persist in postsecondary education. In addition, just 100 hours of adult basic education instruction translates to a mean income gain of 53 percent, or \$10,000 more in annual income (Morgan, Waite, & Diecuch, 2017).

A substantial portion of adult basic education is provided by non-collegiate, community-based learning centers that serve older youth and adults who need nontraditional options in order to achieve their educational goals. These community-based organizations are unique and vital contributors to successful achievement of the AEFLA purpose, and AEFLA funding is essential to their viability. However, at current levels of funding, they are able to serve only a small percentage of the adults who could benefit from their programs.

Recommendation: Recognize the foundational role of the community-based programs and services provided through AEFLA in the overall success of WIOA workforce training initiatives. Acknowledge this role by adopting the recommendation for a competency-based accountability and reporting system made below in Point 4, and by increasing funding support for AEFLA-funded programs, doubling it to \$1.35 billion over the next five years, beginning with \$810 million for FY22.

Point 2. Recognize that full and effective participation in the workforce requires the application of broader life skills

Both Section 2 and Section 202 define the purposes of the WIOA legislation in terms of “the employment, education, training, and support services [needed] to succeed in the labor market.” This narrow definition does not reflect the reality of the current employment situation. In the post-COVID economy, in which job changes are frequent and employment may involve downsizing to part-time work or becoming a gig worker, the ability to obtain and retain employment is dependent on a broad spectrum of skills and attributes, including flexibility, communication, initiative, collaboration, and various literacies: information literacy, digital literacy, financial literacy, health literacy, media literacy—in short, the skills and attributes that underlie full participation in all aspects of adult life, including not only the workplace but also family life and life in the community.

Recommendation: Update the purpose language in WIOA as follows:

- Section 2, paragraph (1): “...access to and opportunities for the employment, education, training, and support services they need to succeed in ***all aspects of adult life, including*** the labor market.”
- Section 202, paragraph (1): “assist adults to become literate and obtain the knowledge and skills necessary for employment, economic self- sufficiency, ***and full participation in all aspects of adult life.***”

Point 3. Amend deficit-based language that leads to deficit-based programming

Section 2, paragraph (1) of WIOA outlines the purpose of the Act as follows:

To increase, for individuals in the United States, particularly those individuals with barriers to employment, access to and opportunities for the employment, education, training, and support services they need to succeed in the labor market.

The dedication of public resources to reduction of barriers to employment is laudable, and the list of barriers included in the legislation is comprehensive and derived from data demonstrating the relationship between a barrier and unemployment rates. However, the reference to “individuals with barriers to employment” characterizes the ***person*** as embodying the barriers, a deficit-based perspective that disrespects WIOA system participants by viewing them as deficient individuals in need of “fixing.” This focus on individual deficiencies is counterproductive to the larger WIOA goal of increasing access to opportunity, because it promotes a one-by-one bootstrap structure that measures results in terms of individual outcomes, rather than a systematic approach that stresses tools and skills for surmounting barriers and measures results in terms of larger program accomplishments.

Recommendation: Reconsider the effects of the deficit-based language and revise it while maintaining critical reporting on who receives what services and with what impact. One possibility would be to change “individuals with barriers” to “individuals *experiencing* barriers” (parallel to the currently used phrase “individuals experiencing homelessness”), and to clearly articulate that the public workforce system’s role is to confront those barriers with the resources needed to overcome them. This change would shift the WIOA mindset from one of fixing individuals with barriers to one of systematic support for economic opportunity and upward mobility.

Point 4. Reorient adult basic education accountability and outcomes reporting toward a competency-based approach

The accountability system currently in place through AEFLA allows only for outcome measures related to increased scores on standardized tests, attainment of high school equivalency, entry into/completion of workforce training or postsecondary education, and entry into the workforce. These measures reflect some of the important goals and motivations of adult basic education participants, but they ignore other essential ones, such as “assisting their children with schoolwork, understanding and addressing their own health issues or those of family members, or participating in civic affairs” (Reder, 2020). Adult basic education programs have extensive insight into the variety of outcomes that their adult learners are able to achieve, but the limits imposed by the current compliance-focused system prevent them from encouraging pursuit of or reporting on those outcomes.

Section 116 of the WIOA legislation identifies five types of measurable skill gain (MSG) for accountability purposes, and Title 2 Section 212 states that, “Programs and activities authorized in this title are subject to the performance accountability provisions described in section 116.” However, the current reporting requirements mandated for AEFLA-funded programs (the National Reporting System) do not allow for all program models to report on all of the MSG types codified in the legislation. Instead, the reporting requirements gather data only on MSG Types 1 (educational gain) and 2 (attainment of a secondary school diploma or equivalent). They exclude a format for reporting outcomes for MSG Types 3, 4, and 5:

- *Type 3.* Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit’s academic standards
- *Type 4.* Satisfactory or better progress report towards established milestones, such as completion of on the job training (OJT) or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training
- *Type 5.* Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams

This exclusion imposes limitations that stand in direct contradiction to both the larger mandates of the WIOA legislation and the actual outcomes that current AEFLA programs are able to achieve and document. The current reporting structure obscures successful models and conceals the achievements that employers find meaningful and that participants recognize as central to their development of in-demand skills that increase their employability. Expanding reporting for workplace literacy through measures such as *progress reports towards established milestones from an employer* (MSG Type 4) or *passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks* (MSG Type 5) would greatly increase the options that adult education providers could use to achieve the outcomes that employers desire. Such expanded reporting would also enable the NRS to fully determine the degree to which programs are “achieving positive outcomes for individuals” that they serve.

A more integrated structure that allows adult education programs to report outcomes in terms of all five MSG types would serve as a key first step in adopting a competency-based approach that promotes and demonstrates progress toward the full spectrum of adults’ learning and self-development objectives. A multiple measures, competency-based approach that is valued by all stakeholders, valid, equitable, and aligned with the goals of the individual and the community will modernize the adult education accountability system to meet its larger role in advancing an inclusive recovery.

Recommendation: Revise the WIOA reporting requirements (Section 116) to decouple accountability from a narrow focus on assessment and encourage a broader perspective on results. Retain the different MSG types, and clarify Section 212 to ensure that reporting requirements for AEFLA-funded programs align with the approach to accountability that Section 116 sets forth. These changes would promote more equitable and appropriate support for the potential of adult basic education programs and the adult learners they serve.

Point 5. Provide support for remote instruction models and the use of technology in adult education

The COVID-19 pandemic has caused adult education programs to develop remote models for instruction, advising and other student supports. Many providers have developed innovative models that employ device loan programs and instructional approaches that increase learner engagement and retention through creative use of technology solutions and flexible learning options. These models also embed digital skill development, a critical competency necessary for adults to obtain employment, support their children in school, and gain economic self-sufficiency (Bergson-Shilcock, 2020).

As a result, the majority of adult education programs now use blended models in which technology provides learning experiences that are shared by learners in varied locations through the use of learning management systems, online materials that accompany textbooks,

gamification apps such as Kahoot! and Quizzizz, and platforms such as YouTube and TED Talks. Given the ongoing need for deep cleaning of school and other buildings during the evening hours when adult classes are typically held, and the usefulness of technology in overcoming transportation and other barriers to participation, adult education's turn toward technology is well on the way to becoming permanent. The field has moved from technology-enhanced instruction to technology-enabled instruction.

However, remote learning programs are more costly than in-person-only ones because they require funds to purchase, maintain, and replace devices; purchase software licenses; and compensate technology navigators and remote classroom aides. Emerging COVID-19-based research suggests that those costs are 12 to 22 percent higher than straightforward in-person delivery. As face-to-face instruction becomes possible again with increases in vaccination levels, the field of adult education is thus at a critical juncture: it can keep up the momentum toward innovative, more engaging program models that meet adult students where they are, or go back to the classroom-only model that serves ever smaller numbers.

Recommendations: Support remote and blended program models in three key ways:

- Amend WIOA to make digital capability/literacy an allowable activity as ABE, ASE, ESOL, and Integrated English Language and Citizenship services are
- Amend the definition of Measurable Skill Gain to include documented digital skills, and fund development of a set of competencies and related outcomes for digital capability
- Provide dedicated funding for the development and implementation of blended and fully online instructional models and related service provision

The field's response to the pandemic has established a strong foundation that can be built on and scaled up. This is the time to invest in the opportunity that foundation presents and take adult education fully into the technology-enabled future.

Point 6. Invest in research on evidence-based AEFLA program models

There are very few recent, rigorous net impact studies that have examined the effect of participation in different types of adult education services on the educational, social, civic, health, and economic outcomes of participants. Research and evaluation activities are included in the National Leadership Activities listed in WIOA Section 242, as well as in the research grant programs supported by the Institute of Education Sciences (IES), but funding levels for such studies are inadequate. This limitation, combined with the outcome reporting limitations described in Point 4 above, means that both the government and the field of adult education lack critical insights into the viability, efficacy, and scalability of different program models, as well as clear understanding of the factors that can promote or inhibit program participation by adults with varying needs and life situations (Patterson, 2018). Given the extensive changes

that have taken place in program models as a result of the pandemic, the need for evidence-based research is more critical than ever.

Recommendations: Strengthen research capacity in two ways:

- Provide \$25 million in additional annual funding to IES to expand rigorous effectiveness research focused on adult learners and adult education delivered in-person and remotely, and invest in one or more research networks consisting of various researchers and research and evaluation organizations.
- Increase funding for AEFLA National Leadership Activities to support a broader spectrum of evidence-based research that will allow for effective evaluation and expansion of the role that adult education programs and services play in opening opportunities for all.

The National Coalition for Literacy hopes that these comments and suggestions will be helpful as the Senate HELP Committee begins bipartisan discussion of potential reforms to the programs authorized under WIOA and strategies to encourage innovation that addresses worker and industry needs. NCL and its member organizations stand ready to provide further information as needed and to work with the Committee to support a robust and effective system of adult education and family literacy.

Respectfully,

The Board of Directors of the National Coalition for Literacy

Contact:

Deborah Kennedy
Executive Director
National Coalition for Literacy
(o) 202-364-1964
Deborah.kennedy@key-words.us
National-coalition-literacy.org

References

- Bergson-Shilcock, A. (2020). The new landscape of digital literacy. How Workers' Uneven Digital Skills Affect Economic Mobility and Business Competitiveness, and What Policymakers Can Do About It. <https://www.nationalskillscoalition.org/resource/publications/the-new-landscape-of-digital-literacy/>
- Kolko, J. (2021, Feb 22). The jobs the pandemic may devastate. *The New York Times*. <https://www.nytimes.com/2021/02/22/upshot/jobs-future-pandemic-.html>

- Minnesota State Careerwise. (2020). Adult basic education. Retrieved from <https://careerwise.minnstate.edu/education/abe.html>.
- Morgan, K., Waite, P., & Diecuch, M. (2017). *The case for investment in adult basic education*. Retrieved from <https://www.proliteracy.org/Portals/0/Reder%20Research.pdf?ver=2017-03-24-151533-647>.
- National Center for Education Statistics. (2018). *PIAAC Results*. Retrieved from https://nces.ed.gov/surveys/piaac/current_results.asp.
- Office of Career, Technical, and Adult Education, Division of Adult Education and Literacy. (2020). *Adult education and literacy*. Retrieved from <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/index.html>.
- Open Door Collective. (2020). *An open door out of poverty*. Retrieved from https://www.opendoorcollective.org/uploads/1/4/3/8/14381196/an_open_door_out_of_poverty_sep_12.pdf.
- Patterson, M. (2018). *Critiquing adult participation in education, report 2: Motivation around adult education*. Retrieved from <https://static1.squarespace.com/static/560d5789e4b015789104a87e/t/5b252a26f950b7fedffb4b18/1529162279757/CAPE+Report+2+Motivation+around+adult+education.pdf>.
- Reder, S. (2020). *A lifelong and life-wide framework for adult literacy education*. Retrieved from <https://files.eric.ed.gov/fulltext/EJ1249006.pdf>.
- Workforce Innovation and Opportunity Act, 29 USC Ch. 32. (2014). <https://uscode.house.gov/view.xhtml?path=/prelim@title29/chapter32&edition=prelim>