



Funding Career Pathways

A FEDERAL FUNDING TOOLKIT FOR STATE AND LOCAL/REGIONAL CAREER PATHWAY PARTNERSHIPS



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Revised Edition

About CLASP

CLASP develops and advocates for policies at the federal, state, and local levels that improve the lives of low-income people. In particular, we seek policies that help strengthen families and create pathways to education and work. For more information, visit www.clasp.org.

About the Center for Postsecondary and Economic Success

The Center for Postsecondary and Economic Success is a policy and advocacy initiative within CLASP. The mission is to advocate for policies and investments that can increase the number of low-income adults and disadvantaged youth who earn marketable postsecondary and industry credentials that are essential to opening doors to good jobs, career advancement, and economic mobility.

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Introduction

Postsecondary education—broadly defined as a credential beyond a high school diploma—continues to be one of the major gateways to family-sustaining jobs. Workers with higher levels of education and skills tend to have greater earnings than workers with lower levels. In 2013, associate’s degree holders earned about 19 percent more than high school graduates with no college and 65 percent more than workers with less than a high school diploma.¹ Having a postsecondary education also offers protection in a weak economy because workers with higher levels of education are less likely to become unemployed. In 2013, the unemployment rate was just 4 percent for workers with a bachelor’s degree and 5.4 percent for those with an associate’s degree. Workers with less than a high school diploma experienced unemployment at more than twice the rate of workers with an associate’s degree.²

There is growing recognition that helping individuals succeed in postsecondary education benefits the national economy. Long-term economic trends point to increasing demand for better-educated workers. By 2020, economists project that 65 percent of all jobs will require at least some postsecondary education.³

While demand is increasing, our adult education, workforce development, and postsecondary education systems have barriers to progress for individuals with low education and skill levels. Too often, adult education and English language programs are not connected to job training or other postsecondary education programs. Many colleges have no connections between their developmental education programs and their occupational and academic programs. Noncredit occupational education is

disconnected from for-credit certificate and degree programs. And too few programs at any level are attuned to employer and industry needs.⁴

DEFINITIONS: CAREER PATHWAYS

Career pathways The career pathway approach fixes fragmented and leaky educational pipelines. Career pathways are linked education and training services that enable students to advance over time to successively higher levels of education and employment in a given industry or occupational sector. Each step on a career pathway is designed to prepare students to progress to the next level of education and employment.⁵ The career pathways framework weaves together adult education, training, and postsecondary programs and connects those services to employers’ workforce needs. Career

pathways include multiple entry and exit points, learner-centered instruction and delivery, assessment of skills and needs, support services, and quality work experiences.⁶

The **career pathway approach** can benefit a wide variety of participants, including those who are younger or older, traditional or nontraditional, and on an academic or occupational path. This approach is especially beneficial for vulnerable populations, whose educational and career success is more often impeded by disconnects between systems and limited access to integrated services.

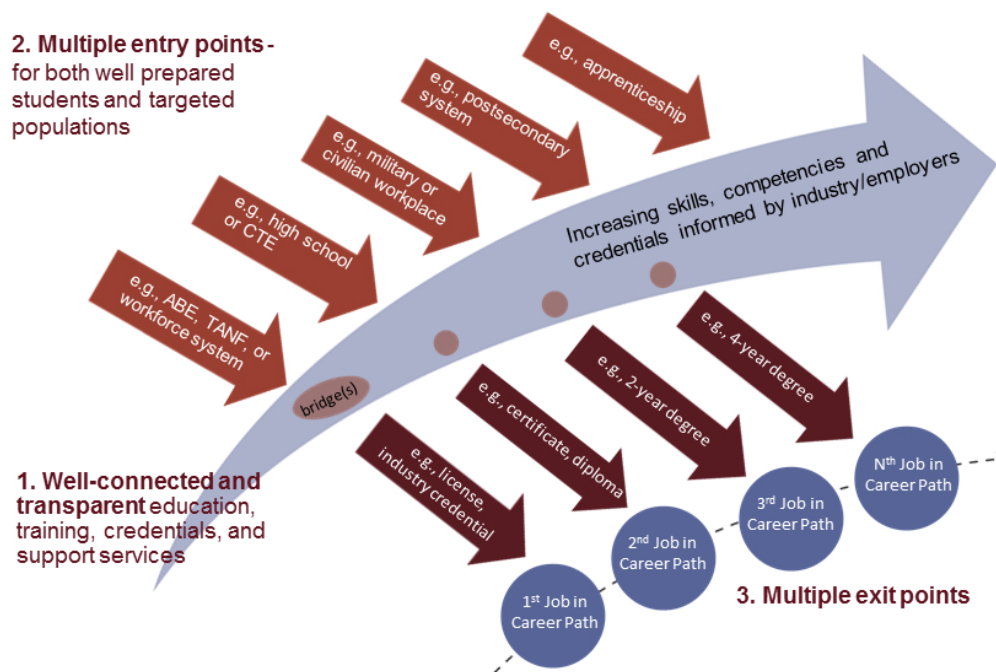
Since CLASP first published this toolkit in 2010, momentum to build and expand the use of career pathways has increased considerably. A number of states and local regions have explored or adopted career pathways aimed at adults or out-of-school youth. To support further implementation, CLASP launched the Alliance for Quality Career Pathways, a voluntary alliance of 10 leading career pathway states.

In Phase I, the Alliance developed a consensus framework of criteria and indicators for quality state and local/regional career pathway partnerships.⁷ Phase I also developed a menu of career pathway participant metrics.

The Alliance for Quality Career Pathways identified three core features of a career pathway:

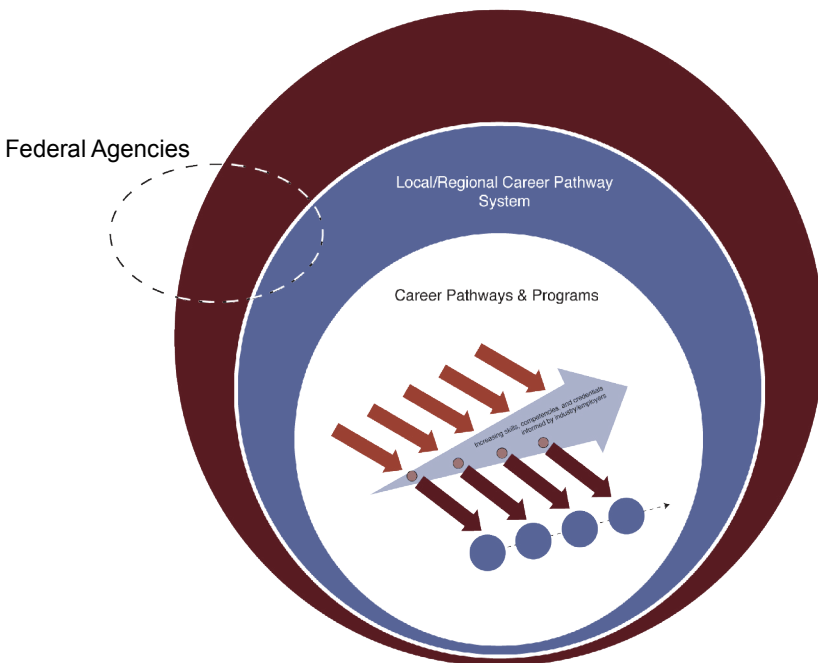
- 1) Well-connected, quality education and training programs that result in credentials with labor market value and include support services, work experiences, and employment services;
- 2) Multiple entry points for targeted populations, starting from initial levels of education and connecting to higher levels.
- 3) Multiple exit points leading to progressively higher levels of employment within a career path.

THREE CORE FEATURES OF A CAREER PATHWAY



In addition, the Alliance identified the key criteria needed to build a career pathway system to support the development and dynamic sustainability of pathways.

BUILDING A CAREER PATHWAY SYSTEM



Based on current evidence and wisdom from the field, Alliance partners agree that the following criteria and indicators can be used by career pathway partners to assess the quality of current practice and continuously improve their career pathway systems:

- 1) **Commit to a Shared Vision and Strategy** for industry sector-based career pathways for youth and adults and for building, scaling, and dynamically sustaining career pathway systems.

- 2) **Engage Employers and Integrate Sector Strategy Principles** to ensure multiple employers, business associations, and labor unions are partners in creating demand-driven career pathways.
- 3) **Collaborate to Make Resources Available** by identifying, prioritizing, and leveraging resources for career pathway systems, partnerships, and programs.
- 4) **Implement Supportive Policies** for career pathway systems, pathways, and programs.
- 5) **Use Data and Shared Measures** to measure, demonstrate, and improve participant outcomes.
- 6) **Implement and Integrate Evidence-Based Practices and Process.**

For complete Alliance materials, please visit www.clasp.org/careerpathways.

Congress and the Obama Administration are also increasingly supportive of career pathways. The Workforce Innovation and Opportunity Act of 2014 formalizes the definition of career pathway in federal law:

CAREER PATHWAY. The term “career pathway” means a combination of rigorous and high-quality education, training, and other services that:

(A) aligns with the skill needs of industries in the economy of the State or regional economy involved;

(B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an “apprenticeship”, except in section 171);

(C) includes counseling to support an individual in achieving the individual’s education and career goals;

(D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

(E) organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;

(F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and

(G) helps an individual enter or advance within a specific occupation or occupational cluster. [Sec. 3(7)]⁸

Additionally, the Employment and Training Administration’s Training and Employment Guidance Letter No. 3-14 highlights seven elements needed for quality job-driven training. These elements, which all support the career pathways approach, include:

- Working with employers to determine hiring needs and design training programs;
- Offering work-based learning opportunities with employers;
- Making better use of data for accountability and consumer choice;
- Measuring and evaluating employment and earnings outcomes;
- Promoting a seamless progress from one education step to another;
- Breaking down barriers to accessing training and providing support services and guidance;
- Creating regional collaborations between workforce development, education, labor, and nonprofit organizations.

Earlier editions of this funding toolkit were widely cited and used at the federal, state, and local levels. This new edition includes revised program profiles reflecting the Workforce Innovation and Opportunity Act legislative and administrative changes to key federal programs. Of all the elements of career pathways, support services are among the most important to student success; they are also the most difficult to fund. An updated appendix identifies 10 federal funding sources that can be used to provide a wide range of support services for participants in career pathways.

Using the Toolkit

This toolkit is designed to help interagency state and local/regional career pathway partnerships identify and use federal resources to support career pathways for adults and youth; it will also be a helpful tool for partners to use when doing unified career pathway planning under the Workforce Innovation and Opportunity Act (WIOA). Specifically, the toolkit aims to help partnerships:

- Understand possible key components and tasks involved in developing, implementing, and maintaining career pathway programs;
- Identify how federal resources can support these key components and tasks; and
- Pinpoint state policy changes or other state actions needed to fully realize federal funding opportunities for pathways that connect to them.

WHO SHOULD USE THIS TOOLKIT?

This guide will be most useful for state-level or local/regional interagency teams engaged in discussions about resources and policies across workforce development, adult education, postsecondary education, and human service programs that can support career pathways. In addition, the federal program summaries will aid regions and communities seeking to better understand federal resources that can support career pathway efforts at the regional or local level.

HOW TO USE THIS TOOLKIT

This toolkit is divided into three sections: a funding options worksheet; federal program summaries; and an appendix on federal funding sources for support services.

We recommend three steps for using the toolkit to identify how federal programs might support a partnership's career pathway efforts:

STEP 1: Review the key tasks for building career pathways in the funding options worksheet included in this toolkit. Use the blank worksheet provided or download the [worksheet](#) from CLASP.org to customize the key tasks for your specific initiative.

- Identify the target populations.
- List the key tasks for developing and implementing your approach under each of the main sections: Business and Industry Engagement; Program Innovation; Student Supports and Student Success Services; Student Aid; and Systems and Partnerships.

Note: You may want to use the sample tasks provided or customize tasks based on the specific interests or needs of the state.

STEP 2: Review the federal program summaries and the appendix on support services to identify resources that might support your career pathways initiative. Complete the worksheet with specific information on how individual federal programs can support key tasks in your career pathways initiative.

- Read the program summaries and note examples, program limitations, and opportunities.
- Review the appendix, which identifies the types of support services that participants may need and the various federal resources that can fund them.
- Use the worksheet to record how you can use multiple federal programs. Some partnerships may want to include just one or a few programs per worksheet, with details about each funding source. Other partnerships may want to include a column for each of the 11 federal programs and simply check off which federal funding sources can fund specific tasks. It may be useful to complete multiple worksheets, with each one grouping similar federal programs.

STEP 3: Identify policy changes or actions needed either to remove barriers to supporting career pathways or to encourage wider use of federal resources to support these approaches. Partnerships can use the following questions to identify opportunities for braiding funding streams, as well as develop plans for moving forward:

- What services, including support services, do the target populations need to succeed in career pathways?
- What services, including support services, do the target populations need to succeed in career pathways?
- What funding streams are available to pay for those services? Are all key stakeholders needed for strong partnerships at the table?
- How can co-enrollment be efficiently and effectively used to access funds?
- What partnerships exist, and are there opportunities to build on them to extend their reach?

- Are all key stakeholders needed for strong partnerships at the table?
- What steps can be taken at the state level to align the administrative requirements associated with braiding various funding streams?
- What steps can be taken at the local/regional level to align the administrative requirements associated with braiding various funding streams?

OVERVIEW OF FEDERAL PROGRAM SUMMARIES

This toolkit includes summaries of 11 federal programs that can support various components of state and local/regional career pathways. Four federal departments administer these programs.

Administered by the U.S. Department of Labor:

- Workforce Innovation and Opportunity Act Title I: Adult and Dislocated Worker
- Workforce Innovation and Opportunity Act Title I: YouthTrade Adjustment Assistance
- Workforce Innovation and Opportunity Act Title III: Employment Services (Wagner-Peyser)
- Trade Adjustment Assistance
- Registered Apprenticeship and Pre-Apprenticeship

Administered by the U.S. Department of Education:

- Workforce Innovation and Opportunity Act Title II: Adult Education and Family Literacy Act
- Workforce Innovation and Opportunity Act Title IV: Vocational Rehabilitation Services
- Pell Grants
- Carl D. Perkins Career and Technical Education

Administered by the U.S. Department of Health and Human Services:

- Temporary Assistance for Needy Families

Administered by the U.S. Department of Agriculture:

- Supplemental Nutrition Assistance Program Employment and Training

Some federal resources may support certain key tasks better than others. For example:

Federal programs that may support staff to perform tasks related to [business and industry engagement](#), as well as [systems and partnerships](#):

- Workforce Innovation and Opportunity Act Title III: Employment Service (Wagner-Peyser Act)
- Temporary Assistance for Needy Families

Federal programs that may support [program innovation](#):

- Workforce Innovation and Opportunity Act Title I: Adult and Dislocated Worker
- Workforce Innovation and Opportunity Act Title I: Youth
- Workforce Innovation and Opportunity Act Title II: Adult Education and Family Literacy Act
- Carl D. Perkins Career and Technical Education

Federal programs that may support [student success services](#):

- Workforce Innovation and Opportunity Act Title IV: Vocational Rehabilitation Services
- Temporary Assistance for Needy Families
- Supplemental Nutrition Assistance Program Employment and Training
- Carl D. Perkins Career and Technical Education

Federal programs that may help with [tuition and other costs of education/training](#):

- Workforce Innovation and Opportunity Act Title I: Adult and Dislocated Worker
- Workforce Innovation and Opportunity Act Title IV: Vocational Rehabilitation Services
- Pell Grants
- Trade Adjustment Assistance

FUNDING OPTIONS WORKSHEET

In the first column below are a list of sample key tasks in designing, implementing, and sustaining career pathway programs. Work with partners to identify potential funding sources for these tasks from core Workforce Innovation and Opportunity Act (WIOA) partners, one-stop partners, and other federal programs with a career pathway focus. [An electronic version of this tool](#) that can be customized for your partnership can be found on the CLASP's Center for Postsecondary and Economic Success site.

Major Federal Funding Streams That Support Key Tasks in Building Career Pathways

TARGET POPULATION: (e.g., TANF recipients or out-of-school youth)			
KEY TASKS	CORE WIOA PROGRAMS	REQUIRED ONE-STOP PARTNER PROGRAMS	OTHER PROGRAMS WITH CAREER PATHWAY FOCUS
	<ul style="list-style-type: none"> WIOA I: Adult WIOA I: Youth WIOA I: Dislocated Worker WIOA II: Adult Education WIOA III: Wagner-Peyser WIOA IV: Rehabilitation Services 	<ul style="list-style-type: none"> Carl D. Perkins Career and Technical Education Act Temporary Assistance to Needy Families (TANF) Trade Adjustment Assistance 	<ul style="list-style-type: none"> Pell Grants Trade Pre-Apprenticeship and Registered Apprenticeship Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)
BUSINESS AND INDUSTRY ENGAGEMENT			
<ul style="list-style-type: none"> Identify sectors and employers within sectors that need skilled workers and offer employment opportunities at different levels/opportunities at different levels 	insert your own text here	insert your own text here	insert your own text here
<ul style="list-style-type: none"> Identify the skill needs and employment opportunities at different levels to inform development of related educational opportunities 	insert your own text here	insert your own text here	insert your own text here

insert your own text here	PROGRAM INNOVATION	insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here
insert your own text here		insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here
insert your own text here		insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here
<ul style="list-style-type: none"> • Create hands-on learning opportunities hosted or sponsored by employers, such as job shadowing, internships, and work experience 		<ul style="list-style-type: none"> • Define, with employer input, the steps leading to certificates, licenses or degrees, and relevant employment opportunities at each level 	<ul style="list-style-type: none"> • Maximize the ability to build toward credentials over time through articulation and transfer (dual enrollment), especially between credit and non-credit offerings 	<ul style="list-style-type: none"> • Create “Road Maps”—visual representations of educational and employment pathways 	<ul style="list-style-type: none"> • Create or re-write curricula for short-term credentials linked to jobs and imbedded in educational pathways 	<ul style="list-style-type: none"> • Develop instructional formats that accelerate and compress content

insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here
insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here
insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here
<ul style="list-style-type: none"> • Make programs accessible to non-traditional students through flexible scheduling and alternative locations, as well as innovative use of technology 	<p>PROGRAM INNOVATION (continued)</p> <ul style="list-style-type: none"> • Enroll cohorts groups through learning communities, etc.. 	<ul style="list-style-type: none"> • Combine basic skills with occupational training (in both developmental education and ABE/ESL) to enable low-skilled adults to enter and complete programs leading to credentials 	<ul style="list-style-type: none"> • Build essential skills needed for career and postsecondary success 	<ul style="list-style-type: none"> • Increase awarding of credit with wider use of prior learning credit

insert your own text here		insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here
insert your own text here		insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here	insert your own text here
<ul style="list-style-type: none"> • Pay for unreimbursed program costs (e.g., equipment and faculty time for team teaching) not fully covered by tuition and institutional support 	SUPPORT SERVICES AND SUCCESS SERVICES	<ul style="list-style-type: none"> • Provide career planning and assessment services 	<ul style="list-style-type: none"> • Provide academic support and tutoring 	<ul style="list-style-type: none"> • Provide case management and coaching, including navigation of financial aid options and educational programs 	<ul style="list-style-type: none"> • Provide support services, such as child care and transportation 	<ul style="list-style-type: none"> • Provide mentoring for youth 	<ul style="list-style-type: none"> • Enable participation in work experience, internships

<ul style="list-style-type: none"> • Provide job search assistance and placement assistance 	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>
<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>
<ul style="list-style-type: none"> • Provide direct student assistance (e.g., tuition, fees, books and supplies) or pay for the costs of participation in education and training programs 	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>
<p>FINANCIAL AID</p>						
<ul style="list-style-type: none"> • Cover indirect costs of attendance (e.g., living expenses) 	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>
<p>SYSTEMS AND PARTNERSHIPS</p>						
<ul style="list-style-type: none"> • Identify/Employ dedicated staff to maintain business/education and other pathway partnerships with community organizations, such as labor or community-based organizations 	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>
<ul style="list-style-type: none"> • Use data to identify sectors and related educational and employment pathways 	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>
<ul style="list-style-type: none"> • Use data to measure participant progress and transitions to career and postsecondary success and evaluate program performance 	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>	<p>insert your own text here</p>

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Workforce Innovation and Opportunity Act

Title I: Adult and Dislocated Worker

Overview: The Workforce Innovation and Opportunity Act of 2014 (WIOA) amends the Workforce Investment Act of 1998 to “strengthen the United States workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs in the United States, and to promote individual and national economic growth...”⁹ The nation’s federally funded workforce development system provides funding for “one-stop” career centers where employers and jobseekers can access a wide array of employment and training services. WIOA consists of Title I (adults, dislocated workers, and youth), Title II (adult education and family literacy), Title III (Wagner-Peyser employment services), Title IV (vocational rehabilitation), and Title V (general provisions). Title I includes three main funding streams distributed to states: adult, dislocated worker, and youth (see the next summary on WIOA Title I: Youth). WIOA makes career pathway development a function of state and local workforce boards and a permissible activity under all parts of the Act. The career pathway approach provides a framework for state and local unified planning that reorients existing education and workforce services (including those authorized under WIOA) from myriad disconnected programs to one system focused on individuals’ postsecondary and economic success.¹⁰

Type of Program: Formula grants allotted to states and then allocated to localities. A portion of funds from the adult and dislocated worker funding streams is reserved at the state level for statewide activities. An additional portion of the dislocated worker funds is reserved at the state level for rapid response activities that address large-scale layoffs and economic dislocation. The remaining funds are allocated to local areas by formula.

Eligibility and Targeting: Under WIOA Title I, “adults” are individuals age 18 and over. “Dislocated workers” include those who have been laid off or have received notice of termination from employment, are self-employed but unemployed due to general economic conditions, are the spouse of a member of the Armed Forces on active duty who is unemployed due to relocation for permanent duty reassignment, or are displaced homemakers. The adult funding stream includes a priority of service for public assistance recipients and other low-income individuals, as well as individuals who are basic skills deficient, for receipt of career and training services. Also, veterans are a priority population as a result of the Jobs for Veterans Act of 2002.

Services and Program Support: WIOA Title I Adult and Dislocated Worker funding streams pay for career services and training services. Career services cover a broad range of activities, including initial and comprehensive assessment of skills, providing information about careers and the local labor market, job search assistance, development of an individual employment plan, career counseling, internships and work experiences linked to careers, financial literacy, English language acquisition and Integrated Education and Training, information and assistance in filing for unemployment compensation, and assistance in establishing eligibility for federal and state financial aid. Training services include occupational skills training, on-the-job training, incumbent worker training, transitional jobs, and adult education and literacy provided concurrently or in combination with other training services. Local areas may also provide support services and needs-related payments to assist individuals participating in career and training services.

Non-federal Funds: There are no state matching requirements under WIOA Title I: Adult and Dislocated Worker.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

WIOA Adult and Dislocated Worker funds support career pathways in both career service and training service activities. Under WIOA, an individual is permitted to receive training services without first receiving career services. There is no sequence of service between these two sets of activities.

In career services, the development of an individual employment plan includes career pathways “to attain career objectives,” promoting the use of career pathways within an individual’s plan. The other activities in career services—aligned assessment, career counseling, support services, work experiences, and more— can be employed within a career pathway system.

Training services explicitly name adult education and literacy activities, including English language acquisition and the use of Integrated Education and Training models to provide those with basic skills deficits access to career pathway programs. In addition to the Individual Training Account model, WIOA establishes training contracts that allow direct procurement of training services for cohorts of participants from training providers.

The Priority of Service requirement in the Title I adult program applies regardless of how much or how little state or local funding is available; it is not contingent upon limited funds. According to this provision, priority access to higher-intensity career services and training must be given to public assistance recipients, other low-income individuals, and individuals who are basic skills deficient. Previously, under WIA, local policies on priority of service varied widely.

FEDERAL FUNDS TO STATES

States reserve a portion of adult and dislocated worker funds for statewide activities; this allocation is typically referred to as the “governor’s reserve” or “state discretionary funds.” These are more flexible than local formula funds. States have used them to support the startup and implementation of career pathways.

FEDERAL FUNDS TO LOCAL PROVIDERS

At the local level, Workforce Development Boards are responsible for planning and oversight of WIOA funds. Local formula funds support the one-stop service delivery system that brings together multiple federally funded workforce development programs and services; they also pay for career and training services for eligible individuals.

Additionally, WIOA local funds can be used for support services (including child care, dependent care, and transportation) and needs-related payments that help individuals succeed in career pathways. Under the previous law (WIA), the Portland Oregon Workforce Investment Board partnered with community colleges to develop career pathways that helped dislocated workers and low-income adults enter postsecondary education and acquire credentials for jobs in demand. At the outset of the initiative, the WIB provided funding for development, capacity building, and services for the first waves of students and continued to use WIA funds to pay the costs of training through Individualized Training Accounts and contracts for cohort training.¹¹

Local areas can also use WIOA funds to support the employer engagement component of career pathways through the local requirement to develop and implement sector initiatives for in-demand industry sectors or occupations in the region. Many local workforce development boards have established business liaison positions at one-stop centers to help employers develop and institutionalize career pathway programs.

WIOA Title I performance metrics are the same as those in Title II (adult education and family literacy): the percent of participants employed at the second and fourth quarters after exit; median earnings; the percent of participants who obtain a secondary diploma or postsecondary credential during participation or within one year after exit; the percent of participants in education or training programs leading to work or a postsecondary credential who are making a measurable skill gain; and effectiveness in serving employers.

PROGRAM LIMITATIONS

- WIOA funds are not generally used for curriculum development.
- WIOA training services funds can only be spent on training programs on the state’s Eligible Training Provider List.
- WIOA training funds must be coordinated with other grant assistance. However, WIOA clarifies that these training funds can be used for individuals who are unable to obtain Pell Grant assistance or who need additional assistance beyond Pell Grants. Local one-stop operators may take into consideration the full cost of participating in training services, including dependent care, transportation, and other basic needs.
- WIOA support services are provided to enable individuals to participate in WIOA activities. However, individuals are only eligible if they cannot obtain such support through other programs.
- Up to 20 percent of allocated funds can be used for the federal share of incumbent worker training programs. This can also be seen as an opportunity to develop career pathway programs for incumbent workers.

OPPORTUNITIES FOR PARTNERS

WIOA establishes career pathways development as a function of the local board. It specifically cites the career pathway strategy for adults: “CAREER PATHWAYS DEVELOPMENT.—The local board, with representatives of secondary and postsecondary education programs, shall lead efforts in the local area to develop and implement career pathways within the local area by aligning the employment, training, education, and supportive services that are needed by adults and youth, particularly individuals with barriers to employment.”(WIOA, Sec.107(d)(5)).

Career pathway development and implementation is also a function of the state workforce board. Additionally,

WIOA introduces mandated unified planning across the four core WIOA programs.

WIOA includes common performance measures, or “primary indicators of performance,” for its six core programs (Title I Youth program, Title I Adult program, Title I Dislocated Worker program, Title II Adult Education and Family Literacy program, Title III Employment Service, and Title IV Rehabilitation Services program). While there are variations in the Title I Youth program and Employment Service, most measures are consistent across all six programs. This is the broadest application to date of common measures across the workforce system; it signals Congressional intent to promote more integrated programming and accountability at the state and local levels.¹² In particular, the addition of a credential attainment rate and a skill gains rate will help align objectives across the core programs. WIOA also requires the development of one or more measures of effectiveness in serving employers.¹³

WIOA has modified many of the prior WIA restrictions on how training can be paid for and delivered. Under the new law:

- Local administrators can fund training by providing Individual Training Accounts (ITAs) for participants to use with eligible providers.
- Local administrators can also contract for services in lieu of using individual training accounts (ITA) for on-the-job training, customized training, incumbent worker training, or transitional employment. The local administrators can also decide to award a training contract to an eligible provider “in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations,” as long as such contract operates as a pay-for-performance contract and does not limit consumer choice.
- Local administrators may also combine the use of individual training accounts and contracts, allowing individuals using ITAs to participate in contracted services.

Other opportunities include:

- Co-enrolling between WIOA Title I and WIOA Title II to deliver Integrated Education and Training and literacy services.
- Using state WIOA discretionary funds to jump-start the development of career pathways.
- Building career pathway initiatives into state plans and into guidelines for local plans.
- Considering steps to increase the use of WIOA funds for training services and the attainment of postsecondary and industry-recognized credentials. Previously, under WIA, some states required local areas to spend a minimum percentage of funds on training to provide additional support for the educational components of pathway initiatives.
- Ensuring that career pathway programs are on the Eligible Training Provider List.
- Working with local areas to align training policies across local areas and ensure that ITAs, if capped, are capped at a high enough level to support training within career pathways programs.
- Working with local areas to orient programs toward longer-term outcomes, including employment that leads to self-sufficiency. To help participants set long-term employment goals, career counseling should include a focus on self-sufficiency.¹⁴
- Providing information and technical assistance on career pathway programs, as well as how WIOA can be leveraged to support participants.¹⁵

Workforce Innovation and Opportunity Act

Title I: Youth

Overview: Title I of WIOA includes funding streams for adults, dislocated workers, and youth. WIOA youth funding is intended to provide comprehensive interventions that “support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants.” (WIOA, Sec.129(c)(2)).

WIOA makes development of career pathway strategies a function of the state and local workforce boards and a permissible activity under all parts of the Act. The career pathway approach provides a framework for state and local unified planning that reorients existing education and workforce services (including those authorized under WIOA) from myriad disconnected programs to one system focused on individuals’ post-secondary and economic success.¹⁶

Type of Program: Formula grants to states and localities. A portion of the funds remains at the state level for the governor’s discretionary use (discretionary funds), while the rest is distributed by states via formula to local workforce areas through Workforce Development Boards (local funds). Boards are required to contract these funds to local providers through a competitive process.

Eligibility and Targeting: WIOA is designed to serve low-income youth who face barriers to continued education and employment. Eligibility is defined separately for out-of-school youth and in-school youth. At least 75 percent of formula funds must be allocated for out-of-school youth.

Out-of-school youth are those aged 16-24 who are not attending any school as defined by state law and meet at least one of these criteria: dropped out of school; is within compulsory school age but did not attend during the previous school year; has obtained a secondary school diploma or equivalent but is low income and basic skills deficient or an English language learner; is in the juvenile or adult justice systems; is homeless, a runaway, or either in or aged out of foster care; is pregnant or parenting; is an individual with a disability; and/or is low-income and “requires additional assistance to enter or complete an educational program or to secure or hold employment.”

In-school youth are low-income individuals aged 14-21 who are attending school and meet at least one of these criteria: is basic skills deficient; is an English language learner; is homeless, a runaway, or either in or aged out of foster care; is pregnant or parenting; is an individual with a disability; and/or “requires additional assistance to complete an education program or secure and hold employment.”

Services/Program Support: Services provided depend on the specific service strategy customized to each youth. However, local areas are required to make available specified youth program elements, including dropout prevention and recovery, linkages between academic and occupational learning, paid and unpaid work experience with academic and occupational education components, training for a specific occupational cluster, career counseling, and exploration of and preparation for postsecondary education and training.

Non-federal funds: There are no state matching requirements under WIOA Title I Youth.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

Local areas are required to conduct an individual needs assessment for each youth, then make services available based on a customized strategy. Each youth's service strategy must include a career goal and provide access to a variety of services. To meet a range of youth development needs, WIOA establishes a set of 14 services—program elements—that must be available in each local area for inclusion, as appropriate, in a participant's plan.

These services include: tutoring; study skills training; instruction leading to secondary school completion (or its recognized equivalent), including evidence-based dropout prevention and recovery strategies; alternative secondary school offerings; paid and unpaid work experiences, including summer employment opportunities directly linked to academic and occupational learning; pre-apprenticeship, internships, and job shadowing; on-the-job training; occupational skills training focused on postsecondary credentials with labor market value; concurrent education and workforce preparation in a specific occupation or cluster; leadership development opportunities, including community service and peer-centered activities that encourage responsibility and other positive social behaviors; supportive services; adult mentoring that lasts at least 12 months and may occur during and/or after program participation; follow-up services; comprehensive guidance and counseling, including drug and alcohol abuse services counseling, as well as referrals to counseling, as appropriate to individual youth's needs; financial literacy; entrepreneurial skills training; career counseling and exploration; and other activities to prepare for the transition to postsecondary education and training.

Local Workforce Development Boards oversee planning for the use of youth funds and the delivery of services. Each local board may designate a standing youth committee, which should include community-based organizations with a record of successfully serving youth, to guide planning and operations related to youth services.

In light of its required program elements, this funding stream is ideally suited to the development of supported

career pathways for youth who need more intensive assistance in obtaining a secondary credential, as well as navigating college transitions or obtaining occupational training, postsecondary credentials, and self-sustaining employment. Previously, under WIA, some governors used state discretionary funds to support career pathways for youth.¹⁷ Local workforce boards also used their local WIA funds to support career pathway programs for low-income in-school and out-of-school youth.

In **Maryland**, the Baltimore Workforce Investment Board used WIA youth funds to support the Career Academy, an alternative education center jointly administered with the Mayor's Office of Employment Development. The Career Academy provides multiple pathways for students to obtain an academic credential, including earning a high school diploma, enrolling in a GED program, enrolling in a Diploma Plus program, and enrolling in Job Corps. In the Diploma Plus model, students earn a diploma and college credits through the Early College Enrollment program at Baltimore City Community College.¹⁸

PROGRAM LIMITATIONS

There are no income requirements for the majority of eligible out-of-school youth—with two exceptions. The following individuals must be low income in order to receive services through WIOA: (a) has obtained a secondary school diploma or equivalent but is low income and basic skills deficient or an English language learner; or (b) is low income and “requires additional assistance to enter or complete an educational program or to secure or hold employment.”

In-school youth must be low income. The low-income definition includes previous eligibility language from WIA. Maximum household income for participation is set at 70 percent of the lower living standard. However, eligibility is also expanded to include individuals who receive or are eligible to receive a free or reduced-price lunch. Additionally, for the purposes of youth services through Title I, the low-income criterion can include “youth living in a high-poverty area.”

All grants and contracts for youth services must be awarded based on a competitive process, making it more difficult to negotiate customized training or pipeline programs with specific employers.

OPPORTUNITIES FOR PARTNERS

WIOA establishes career pathways development as a function of the local board and specifically cites the career pathway strategy for youth: “CAREER PATHWAYS DEVELOPMENT.—The local board, with representatives of secondary and postsecondary education programs, shall lead efforts in the local area to develop and implement career pathways within the local area by aligning the employment, training, education, and supportive services that are needed by adults and youth, particularly individuals with barriers to employment.”(WIOA, Sec.107(d)(5)).

WIOA requires local areas to use youth funds to conduct an objective assessment “for the purpose of identifying appropriate services and career pathways for participants.” Additionally, WIOA requires that at least 20 percent of youth formula funds be spent on paid and unpaid work experiences that incorporate academic and occupational education for out-of-school youth and in-school youth.¹⁹ Such work experiences can be a critical piece of a career pathway program.

The responsibilities for programming WIOA Title I Youth funding fall to local workforce areas. States can assist local areas in moving in this direction in several ways:

- Establish a state youth standing committee (or similar entity) to bring together leaders from across systems and sectors in order to provide state and local efforts with strategic guidance on coordinating and aligning resources and programming across the education, workforce, and state-administered youth-serving systems. While not required by WIOA statute, several states have established a state youth council or similar entity.
- Provide technical assistance to strengthen the strategic activities of local boards in order to facilitate

coordination among education, workforce, foster care, and juvenile justice systems and provide local areas with labor market and career information.

- Set aside a portion of state discretionary funding to offer incentives for developing local career pathway models. Use the state funding to leverage the expenditure of local WIOA youth funds to create career pathways linked to growing areas of the state or regional economy.

Trade Adjustment Assistance

Overview: Trade Adjustment Assistance (TAA) provides benefits and services to workers who lose their jobs as a result of increased import competition, relocation of production or services to any foreign country, or foreign contracting for services. The TAA program offers extended income support, training, employment and case management services, and other benefits to displaced workers who are certified as eligible. Wage subsidies are available to older workers who take new jobs that pay less than their previous jobs. With its potential to support long-term training, TAA enables certified workers to participate in a wide range of education and training options leading to employment. TAA has been reauthorized many times since its creation in 1962; the most recent reauthorization, as part of the Consolidated and Further Continuing Appropriations Act, funds the program through September 2015.

Type of Program: Individual entitlement to extended unemployment benefits, with funding for training and other services, subject to an overall funding limit set by Congress.

Eligibility and Targeting: Workers must have lost their jobs because their firms faced increased import competition or because the firm's operations were shifted outside the United States. In the past, TAA covered workers "that produced an article," but TAA benefits and services have been extended to workers displaced from service-sector firms. Workers in firms that do business with a trade-affected firm (such as a supplier or downstream producer) may also be eligible for TAA. In addition, workers in firms that have been adversely affected by foreign trade, as determined by the International Trade Commission, are eligible.

To be eligible for TAA, a group of workers must petition the U.S. Department of Labor and become certified. Individual workers covered by the certification can apply for benefits and services at a local one-stop center.

Services/Program Support: TAA benefits include extended unemployment benefits known as Trade Re-adjustment Allowances (TRA). Services may include training, allowances for job search and relocation, employment and case management services, wage subsidies for older workers, and health coverage tax credits as a subsidy for health insurance premiums.²⁰

Non-federal Funds: TAA is a direct spending program that is fully funded by the federal government.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

TAA is a significant source of financial support for certified workers who pursue extended education and training. Workers who are approved for training can

collect up to 130 weeks of income support, including 26 weeks of regular unemployment insurance benefits in most states. The last 13 weeks of income support are only available to workers who:

- Have exhausted prior weeks of income support;

- Require a longer period of income support to complete an approved training program that leads to a degree or industry-recognized credential; and
- Make satisfactory progress, as measured by training benchmarks established when the worker enrolls in training.

The following table summarizes the amount of extended income support available to TAA participants:

TYPES OF BENEFITS	WEEKS OF INCOME SUPPORT
Basic TRA (first level of TAA)	52 minus the number of weeks of regular UI benefits (26 in most states)
Additional TRA (second level of TAA)	65
Completion TRA (third level of TAA)	13
Maximum Number of Weeks	130

TAA training funds can support the participation of eligible workers in a course or a related group of courses leading toward an occupational goal. Allowable training includes:

- Basic or remedial education;
- Prerequisite education required to enroll in training;
- Classroom training, including training approved under the Workforce Investment Act or training whose costs are paid partly or wholly by another federal or state program;
- Employer-based training, including on-the-job training and customized training, and
- Apprenticeship programs.

TAA participants can undertake remedial education or prerequisite education followed by occupational train-

ing, or they can enroll in career pathway programs that combine basic skills instruction with occupational training that leads to a job or postsecondary program. Participants can pursue a wide range of education and training options, including training to obtain a degree or certification from an accredited institution of higher education.

Reauthorizations have greatly increased program flexibility, allowing participants to combine work and training in new ways. Workers who are certified can start training before they are laid off. Receipt of TAA income support requires participation in full-time training. However, workers can choose to participate in part-time training without receiving such income support. They can also combine full-time training with part-time employment.

In addition to training, workers can receive allowances for relocation or job search outside of their immediate geographic area. Workers also have access to case management and employment services, including assessment, counseling, referrals to support services, and information about financial aid.

Minnesota co-enrolls every TAA-certified worker in the Title I dislocated worker program to ensure each worker can receive the full range of services. Each TAA participant is assigned a dislocated worker counselor based in a one-stop center and a TAA program specialist based in the central office.

In **Massachusetts**, it is common for TAA-certified workers to participate in both remedial education and occupational skills training. The state strongly encourages TAA staff to customize remedial education programs and to combine basic skills instruction with occupational skills training.

PROGRAM LIMITATIONS

- TAA benefits and services are only available to workers who have lost their jobs as a result of foreign trade. They must be members of a group that has been certified by the U.S. Department of Labor, and they must be determined to be individually eligible by their state.

- TAA is generally not used for curriculum development or other program support. However, training costs include those for tuition, fees, tools, and books, as well as supplemental payments for transportation and subsistence costs if training is pursued outside the worker's commuting area.
- Some states cap the amount of training funding that can be spent on a participant, but these caps tend to be much higher than those on WIOA training funds.
- Apart from transportation and subsistence costs associated with training, TAA is not used to pay for support services that are typically funded under WIOA.

OPPORTUNITIES FOR STATES

- Program administrators should inform TAA participants about opportunities to pursue long-term training while receiving income support.
- State administrators should encourage the use of remedial education in combination or concurrently with occupational training to accelerate progress toward credentials and employment.
- Co-enrollment of TAA participants in WIOA is likely to increase the range of available services, especially support services.
- State administrators should make workers aware of the opportunity to combine work and learning through on-the-job training, apprenticeships, and other training options.
- State administrators should ensure that individuals who are eligible for Pell Grants can use them for living expenses while TAA supports training.

Registered Apprenticeship and Pre-Apprenticeship

Overview: The National Apprenticeship Act of 1937 authorizes the federal government, in collaboration with states, to oversee the nation's apprenticeship system. Registered Apprenticeship programs combine on-the-job training with classroom instruction, leading to portable credentials. Participating employers develop a steady pipeline of skilled workers. As of 2013, there were over 280,000 active apprentices in about 19,500 apprenticeship programs registered with the U.S. Department of Labor's Office of Apprenticeship. Data suggest the number of unregistered apprentices would far exceed the number of registered ones.²¹

Pre-apprenticeship programs are bridges into Registered Apprenticeship programs for those who do not meet the eligibility requirements for a Registered Apprenticeship program. They are typically short-term training programs that are recognized by (but not registered with), the U.S. Department of Labor.

Type of Program: Nationally administered program.

Eligibility and Targeting: The sponsor of a Registered Apprenticeship program identifies the minimum qualifications to apply. The eligible starting age can be no less than 16 years of age; individuals usually must be 18 years old to apprentice in hazardous occupations. Program sponsors may identify additional minimum qualifications and credentials to apply (e.g., education, physical ability to perform the essential functions of the occupation, proof of age). All applicants are required to meet the minimum qualifications. Based on the selection method used by the sponsor, there may be additional qualification standards, such as aptitude tests and interviews, school grades, and previous work experience.

Services/Program Support: Federal funding supports federal staff, located in state and local offices, who work directly with business and industry to develop programs that meet the skilled training needs of the employer/sponsor. Apprentices receive a mix of paid on-the-job learning, related technical instruction, and mentoring.

Non-federal Funds: There is no state matching requirement for this program. However, 41 states operate and fund State Apprenticeship Agencies recognized by the U.S. Department of Labor to register and oversee apprenticeship programs for federal purposes. Staff in these states develop Registered Apprenticeship programs and provide assistance to program sponsors.²²

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

Registered Apprenticeship programs include a mix of on-the-job experience and classroom training, allowing participating individuals to earn wages as they receive training and advance into jobs requiring higher skill levels.

Registered Apprenticeship programs are career pathways. Pre-apprenticeship programs are very similar to career pathway bridge programs; they are designed to help individuals without mandatory skills or prerequisites gain the necessary education to enter a Registered Apprenticeship program.

Through articulation agreements between Registered Apprenticeship program sponsors and the community and technical colleges with which they partner in the delivery of classroom training, many participants have the opportunity to simultaneously earn an associate's degree or substantial credit toward one. Some colleges have agreed to automatically award college credit, based on a third-party evaluation, for apprenticeship programs sponsored by employers or labor unions.²³ Through a Registered Apprenticeship program, young people considering a work-based approach are not given a false choice between their career and an education.

Federal funding for Registered Apprenticeship supports federal staff, who work with employers to sponsor programs and ensure compliance with federal, state, and industry requirements. Sponsors can be individual employers, employer associations, or labor-management partnerships. Funding for services such as training and career counseling can come from Apprenticeship sponsors, the Workforce Innovation and Opportunity Act, foundation funds, state grants, or other sources. Mentoring is a critical, required component of a Registered Apprenticeship. Apprenticeship staff work with employers and training providers to define competencies for pre-apprenticeship programs that act as bridges into Registered Apprenticeship programs. Funds to develop pre-apprenticeship programs may come from the Apprenticeship sponsor, WIOA, the training provider, or state or foundation grants.

Washington used WIA state discretionary funds to support some pre-apprenticeship programs as a bridge into Registered Apprenticeship programs.²⁴ The state also gives apprentices a 50 percent discount on community college tuition.²⁵

Registered Apprenticeship staff have deep connections to industry and can work to develop new apprenticeship programs as part of a pathway initiative. Apprenticeship programs can also be connected to community/technical colleges and college credit; this promotes integration with career pathways. While these connections are not widespread, some states and community colleges encourage collaboration.²⁶

A comprehensive partnership in **New Jersey**—led by the State Employment and Training Commission (SETC), New Jersey Department of Labor and Workforce Development, and New Jersey AFL/CIO—developed a statewide model to award college credit for participating registered apprenticeships in the building and construction trades. New Jersey Pathways Leading Apprentices to a College Education (NJ PLACE), which includes New Jersey's 19 community colleges, organized labor, and several state agencies, was designed for current and former apprentices to apply apprenticeship training toward a college degree.²⁷

In the **Wisconsin** Technical College System, apprenticeship-related instruction is considered an approved academic program. Apprentices can earn 39 credits toward a 60-credit journey-worker Associate of Applied Arts degree.

Apprenticeship Carolina™ is an initiative in the **South Carolina** Technical College System. Over 11,000 apprentices have been served in 676 apprenticeship programs. Apprenticeship Carolina works to ensure every South Carolina employer has access to the information and technical assistance they need to create demand-driven Registered Apprenticeship programs.²⁸ Apprenticeship consultants are available, at no charge to employers, to guide companies through the Registered Apprenticeship development process—from initial information to full

recognition in the national Registered Apprenticeship System. In addition to staff and marketing, the state funds an employer tax credit of \$1,000 per year per apprentice for up to four years as an incentive.

PROGRAM LIMITATIONS

- Registered Apprenticeship training programs must include program standards agreed to with a sponsoring employer, employer association, or labor-management partnership and an increasing schedule of wages.²⁹
- To be eligible for a Registered Apprenticeship program, an occupation must require a certain amount of on-the-job learning and related instruction, which may be provided by training centers, technical schools, community colleges, or institutions offering online learning approaches.

OPPORTUNITIES FOR STATES

- Develop new Registered Apprenticeship programs that use a career pathway framework and are based on employer demand and the availability of qualified workers.
- Support the development and expansion of pre-apprenticeship programs as bridges into Registered Apprenticeships for adults and youth who traditionally have been unable to access these programs.
- Create closer connections between Registered Apprenticeship and other programs that can support career pathway initiatives (e.g., WIOA).³⁰
- Coordinate employer engagement activities between Registered Apprenticeship and career pathway initiatives.
- Include Registered Apprenticeship as part of the overall career pathways approach.
- Support academic credit for graduates of apprentice-

ship programs or components of programs in order to increase opportunities for college-level work.

The American Apprenticeship Initiative of 2015 will invest approximately \$100 million in an anticipated 25 public/private partnerships to accomplish these goals:³¹

- Support the expansion of quality, innovative American Apprenticeship programs into high-growth occupations and industries;
- Create career pathways that encompass American Apprenticeship and align with other postsecondary educational offerings;
- Use strategies to significantly increase apprenticeship opportunities for jobseekers and workers; and
- Leverage and develop public policies that increase demand for American Apprenticeship and support sustainability.

WIOA Title III: Employment Service (Wagner-Peyser Act)

Overview: Employment Service provides employment services and career counseling to jobseekers, as well as labor exchange services to jobseekers and employers.

Type of Program: Formula grants to states.

Eligibility and Targeting: Services are available to any jobseeker, regardless of employment status. Veterans receive priority, and disabled veterans receive the highest priority. States can provide specialized assistance to other targeted populations. Any employer seeking workers is eligible for employer services.

Services/Program Support: Services include job search and placement assistance for jobseekers, recruitment services and special technical services for employers, re-employment services for unemployment insurance claimants, labor exchange services for workers who have received notice of permanent or impending layoff, referrals and financial aid application assistance for training and educational resources and programs, and the development and provision of labor market and occupational information.

Non-federal Funds: There is no state matching requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

Employment Service staff can play an important role in guiding people toward jobs, as well as education and training organized around career pathways, through a range of one-on-one assistance and group services, including:

- Counseling and career planning;
- Testing and assessment;
- Job search assistance;
- Labor market information dissemination;
- Training provider information; and
- Recruitment, job matching, and placement.

Employment Service staff can help identify local employer partners, such as those that offer high-wage opportunities in established career pathways. Employment Service typically works with employers to identify employment opportunities and match qualified jobseekers with openings.

The **Wisconsin** Department of Workforce Development redirected resources to ensure that every local workforce area has at least one certified employment counselor to provide career counseling to clients. This policy, coupled with other changes made under the state's Regional Industry Skills Education (RISE) initiative, strengthened the use of public workforce resources for career pathway models. These policy changes included adding career pathway training models (e.g., apprenticeships, bridges,

and chunked career pathways training in targeted occupations) to the state's Eligible Training Provider List and required all workforce development boards to incorporate RISE career pathway principles into their WIA local plans.

PROGRAM LIMITATIONS

In general, the only Employment Service resources available to support career pathways are staff and technical assistance—not financial resources to cover education and training. For example, staff can provide employment services and offer intensive counseling services to people in career pathways; however, the program cannot support tuition or other costs for participants in education or occupational training.

OPPORTUNITIES FOR STATES

- Employment Service staff can provide counseling to guide people toward established career pathways and provide career navigation services to career pathway participants.
- Online state job banks can help jobseekers learn about employment opportunities and employers in regional career pathways.
- Employment Service resources or staff may be used to analyze and disseminate labor market information on industries and occupations to help inform the development of career pathways.

Workforce Innovation and Opportunity Act Title II: Adult Education and Family Literacy Act

Overview: The Adult Education and Family Literacy Act (AEFLA, Title II of the Workforce Innovation and Opportunity Act) provides states with funding for a variety of services to help adults develop basic skills (e.g., reading, writing, math, English language acquisition), transition to postsecondary education and training, and gain employment. The adult education, English language instruction, and integrated education and training that WIOA Title II supports can open doors to career pathway programs for those with low skills or limited English abilities.

Type of Program: Formula grants to states and localities. States must distribute 82.5 percent of their federal allocation to local providers, with the balance allotted for state leadership activities (12.5 percent) and administrative expenses (5 percent). States must award local grants or contracts through a competitive process that provides “direct and equitable” access to federal adult education funds by all types of eligible program providers (e.g., school districts, community colleges, libraries, community-based organizations, public housing authorities, and other public or private nonprofit entities).

Eligibility and Targeting: Eligibility is limited to adults who are at least 16 years of age and not currently enrolled, or required to be enrolled, in high school. Additional eligibility criteria include one of more of the following: basic skills deficient; lack a high school diploma or its equivalent; function below the level of a high school graduate (even if the individual has a high school credential); or unable to speak, read, or write the English language.

Services/Program Support: The purpose of the Act is to help adults increase literacy and numeracy activities necessary to complete a high school education, transition to postsecondary education and training, and obtain employment. The Act funds adult education and literacy services, including workplace literacy, family literacy programs, and English language services.

Non-federal Funds: States are required to provide a match using non-federal funds amounting to at least 25 percent of the total funds spent on adult education in the state. This match may be cash or in-kind.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

The strong emphasis federal adult education law places on preparation for employment and postsecondary education and training fits well with career pathway approaches. For example, states must describe how adult education and literacy activities will be integrated with other adult education, career development, and employment and training activities. Title II local plans are reviewed by the Local Workforce Development Boards.

Title II performance metrics are the same as those in Title I (adult, youth, and dislocated worker):

- Percent employed at the second and fourth quarter after exit;
- Median earnings in that employment;
- Percent who obtained a secondary diploma or postsecondary credential during participation or within one year after exit;

- Percent in an education or training program leading to a postsecondary credential that are making a measurable skill gain; and
- Service to employers.

Federal law provides substantial flexibility on how adult education funds can be used for eligible individuals and allowable services. When academic and English language services below the postsecondary level are provided to adults as part of career pathway, this can shorten the timeline to postsecondary credentials, improve transitions to further education, reduce costs, and decrease the need for developmental education.³²

Specifically, federal adult education funds can be used to:³³

Support development of academic and English language components of career pathway programs, as long as the services are below the postsecondary level. This might include, for example, creating curricula that are contextualized to occupational pathways or seeding innovation of new delivery formats, such as dual enrollment or learning communities.

Fund operational costs of integrated education and training services. The term “integrated education and training” means a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement (WIOA, Sec.203(11)). For example, federal adult education funds could pay for an adult education instructor to teach the academic and English language portions of a program that integrates basic skills and English language content with occupational training in a co-instruction format.³⁴

Reward performance for achieving goals beyond what is traditionally expected, such as setting state goals that complement federal ones for postsecondary transition and credential completion by adult education students. States could also set goals for reducing the

need for developmental education among adult education students who enter college.

Provide support services to promote persistence in and completion of adult education and transitions to postsecondary education and training or employment. This might include helping fund transition coordinators who connect students with the resources needed to overcome academic and personal challenges.

Washington’s Integrated Basic Education and Skills Training (I-BEST) program delivers adult education and occupational training using faculty teams, which help advance students along pathways that carry college credit and result in recognized job credentials. I-BEST pilot programs were funded by WIA Title II state leadership funds, Carl D. Perkins Career and Technical Education Act state leadership dollars, and general state appropriations. Local I-BEST programs are currently supported through state and federal adult education funds, student tuition, and an enhanced reimbursement rate of 1.75 per full-time equivalent student for I-BEST enrollments. This enhanced reimbursement rate helps offset the additional costs of the I-BEST model.

Wisconsin’s Career Pathways initiative promotes adult career pathway development throughout the technical college and workforce development systems, including bridges that combine basic academic, English language, and occupational content. Students receive college credit toward an approved occupational program and benefit from contextualized instructional strategies (e.g., team teaching, labs, simulations) and career development activities. Colleges are reconfiguring postsecondary programs with high employer demand into stackable credentials, offering adult learners an increasing number of career pathway options. Colleges increased the use of WIA Title II grant funds (which they receive as providers) for career pathways. Wisconsin’s career pathways are also supported by other sources of state and federal funds.

Illinois uses state and federal adult education funds for career pathway bridges that contextualize basic academic and English language skills to occupations in high-de-

mand industry sectors. After piloting this bridge model, Illinois is now implementing it statewide and connecting the bridges to the 16 career clusters defined under the federal Carl D. Perkins Career and Technical Education Act. The goal is to bridge the instructional gap between the initial skills of individuals and what they need to enter and succeed in postsecondary education and career pathway employment. The Illinois ICAPS model integrates Adult Basic Education and Career and Technical Education. State leadership funds are used to provide professional development and technical assistance to bridge program providers to promote statewide consistency in how basic components are integrated into these models.

FEDERAL FUNDS TO STATES

State leadership funds (12.5 percent of funds) can be used to:

- Develop and disseminate curricula;
- Develop content and models for integrated education and training and career pathways;
- Integrate adult education and English language learning with occupational skills training;
- Promote linkages with employers;
- Develop and implement transitions from adult education to postsecondary education;
- Promote linkages with higher education;
- Provide professional development;
- Benchmark and reward performance; and
- Coordinate adult education with existing support services, such as transportation and child care.

FEDERAL FUNDS TO LOCAL PROVIDERS

Funds distributed to local providers must be used to establish or operate one or more programs that provide services or instruction to participants in adult education and literacy, including workplace literacy services, family literacy services, and English literacy programs. Local adult education or English language programs can partner with community colleges and vocational education providers to support the creation and implementation of career pathways. In addition, local providers can contextualize basic skills content and integrate basic skills with workforce education.

States and local programs must report adult education and English language student outcomes in the National Reporting System (NRS) for federally supported students enrolled in career pathways, just as they do for other adult education students receiving federally funded services.

PROGRAM LIMITATIONS

Local providers must use federal adult education funds to provide adult education and literacy services, including workplace literacy services, family literacy services, or English literacy services. These services must be below the postsecondary level.

OPPORTUNITIES FOR STATES

Given the flexibility of federal adult education funds and the competitive process for awarding local funds, states can use them strategically to support career pathways for lower-skilled adults and out-of-school youth. States can use these funds to:

- Deliver integrated education and training (IET) by contextualizing academic content to specific occupations and career pathways;
- Dually or concurrently enroll students in adult education or English language services and postsecondary education and training, with the adult education funds covering the services below the postsecondary level (including the adult education/English language portion of the educational program), as well as related supports;
- Align curricula and assessments across adult education, postsecondary education, and job training programs;
- Create new delivery models (e.g., IET) that help students progress faster through college and career pathways, and require local providers to adopt the most promising models through the competitive grant process;
- Create incentives for local programs to focus on postsecondary preparation and success by offering enhanced funding for career pathway transition models (as Washington has done with I-BEST) and by setting targets for local programs to improve the transition and success rates of adult education

students in college and career pathways;

- Consider the ways in which state funds beyond the required state match, if accounted for separately, can be used to support career pathway efforts in even more flexible ways;
- Support meaningful and active cross-agency partnerships and collaboration; and
- Support professional development for new instructional methods (e.g., team teaching) that are commonly used in career pathway programs.

Workforce Innovation and Opportunity Act Title IV: Vocational Rehabilitation Services

SNAPSHOT

Overview: Title I of the Rehabilitation Act of 1973 authorizes the federal government to make grants to state agencies for vocational rehabilitation services. Title IV of the Workforce Innovation and Opportunity Act of 2014 reauthorized this funding for state grants.

Type of Program: Formula grants go to states based on population, average per capita income, and original allotment at the time of the 1974 legislation. States must have an approved Title I plan that is part of the larger state unified plan, which describes coordination between all WIOA titles.

Eligibility and Targeting: State agencies determine eligibility and provision of service. Eligibility is limited to adults who have a physical or mental impairment that results in substantial employment barriers and who require Title IV services to “prepare for, secure, retain, advance in, or regain employment that is consistent with the applicant’s strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.”³⁵ States must give priority of services to persons with the “most significant disabilities”; others can be put on a waiting list.³⁶

Services/Program Support: Participants receive individualized employment plans and a variety of services can be provided on an individual or cohort basis. Services can include assessment of needs; career coaching and career choice assistance; job search, placement, and retention; interpreter services; education and training services, including tuition, books, and supplies; and occupational license fees, tools, and equipment.³⁷ WIOA included three new purposes for Title IV: emphasizing competitive integrated employment, increasing employer involvement, and supporting individuals with disabilities as they transition from secondary to postsecondary education.

Non-federal Funds: States must provide a match of at least 21.3 percent. If the state does not provide this proportion of match, their federal allocation is reduced and can be allotted to other states.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

Occupational training can be an important component of the Individualized Plan for Employment required for each Title IV participant. Resources for eligible individuals can provide career navigation services throughout a career pathway and a variety of support services, including transportation, specialized equipment, and interpreter or reading services. Vocational rehabilitation funds can be

used to support individuals or groups of individuals, allowing cohort career pathway experiences.

WIOA requires each state to reserve 15 percent of its federal funds for pre-employment services for youth with disabilities who are transitioning out of secondary school. This requires partnership with local education agencies that provide services under the Individuals with Disabilities Act, which funds special education for

children with disabilities from birth to age 21.³⁸ WIOA's increased emphasis on services to successfully transition students to postsecondary education means that working with higher education institutions is also important.

PROGRAM LIMITATIONS

Title IV participants must exhaust every other source of federal funding before Vocational Rehabilitation funds can be used. For example, Title IV participants entering higher education would need to apply for financial aid and use a Pell Grant or other federal financial source prior to using Title IV funds to cover tuition.

OPPORTUNITIES FOR STATES

- Across the country, public opinion and expectations about disability and employment are changing. Emerging policies and practices, court-directed initiatives, increased disability advocacy efforts, and progressive statewide plans resulting from the Supreme Court's *Olmstead* decision are driving the rapid pace of this transformation. The *Olmstead v L.C.* ruling requires states to eliminate unnecessary segregation of persons with disabilities and to ensure that persons with disabilities receive services in the most integrated setting appropriate to their needs.³⁹ The U.S. Department of Justice Civil Rights Division is working with the Department of Health and Human Services, state and local government officials, and disability rights groups to create effective, nationwide programming to make the Americans with Disabilities Act a reality. Deliver integrated education and training (IET) by contextualizing academic content to specific occupations and career pathways;
- The Department of Labor's Disability Employment Initiative (DEI) works with state and local providers to increase coordination of education and training programs and to build community partnerships that provide better service to individuals with disabilities and improve employment outcomes. In 2014, DEI awarded grants specifically designed to increase the participation of youth and adults with disabilities in existing career pathway systems;
- Align curricula and assessments across adult edu-

cation, postsecondary education, and job training programs;

- **Minnesota** DEI Career Pathways will merge these powerful strategies to help 155 adults with disabilities (age 18+) succeed in career pathways education and employment. The project will include a specific focus on veterans, TANF recipients, ESL/ ABE participants, ex-offenders, and Wagner Peyser universal customers, as well as active and wait-listed Vocational Rehabilitation consumers. Three regions with robust career pathway programs in manufacturing, health care, and business administration will strengthen their partnerships and adapt education and services to support adults with disabilities—supporting them through career pathway education and training all the way employment. Cross-agency state leadership will support and sustain these strengthened models through revised policies, professional development, braided resources, and new career pathways practices.

Pell Grants

Overview: The federal Pell Grant Program, authorized by Title IV of the Higher Education Act, is the largest federal grant program supporting postsecondary education and training for low-income students. It distributes need-based awards through postsecondary institutions to help students with the costs of attendance; this includes direct costs, such as tuition and fees, and indirect costs, such as living expenses.

Type of Program: Grants to individuals via the higher education institution they attend.

Eligibility and Targeting: Both students and educational programs must meet specific eligibility criteria. Pell Grants target lower-income students enrolled in programs that result in a certificate or degree.

Services/Program Support: For students enrolled in eligible postsecondary programs that lead to a certificate or degree, Pell Grant funding can cover tuition, fees, housing and food expenses, books and supplies, transportation, and child care. Pell Grants can cover up to a year of remedial coursework if the student has been admitted to an eligible program and the remediation is part of or required for that program.

Non-federal Funds: Pell Grants are wholly funded by the federal government. There is no state or institutional matching requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

States and local institutions have few, if any, opportunities to make policy that directly affects how Pell Grant funding is used because funding flows directly from the federal government to the student via the educational institution the recipient attends and student and institutional eligibility standards are determined by federal law. However, states and institutions can adopt policies and practices that expand the number of students and educational programs that are eligible for student aid. Pell Grants can help ensure that lower-income students have access to career pathways. States and local institutions can raise awareness about the availability of Pell Grants to pay for tuition and other expenses related to participating in an eligible career pathway. States can

work with postsecondary institutions to make career pathway components Pell-eligible whenever possible. If a component cannot be designed as Pell-eligible, states and postsecondary institutions should consider how to support it with complementary funds from other sources.

Students must meet individual eligibility criteria and be enrolled as a regular student in a certificate or degree program that also meets Pell Grant eligibility criteria. A student is eligible for Pell Grants if he or she meets all of these conditions:

- The student demonstrates financial need.
- The student is a U.S. citizen or eligible noncitizen.

- The student has a high school diploma or its recognized equivalent or was homeschooled or qualified by an Ability to Benefit process.⁴⁰ The Ability to Benefit provision in Section 484 of the Higher Education Act, allows a student who was homeschooled—or who is enrolled in an eligible career pathway program but does not possess a high school diploma or its recognized equivalent—to demonstrate his or her “ability to benefit” from postsecondary education in one of three ways:

1. Pass an ability-to-benefit test;
2. Complete six postsecondary credits of coursework applicable to a degree or certificate offered by an institution of higher education; or
3. Through a state-established process.

In this subsection, the term ‘eligible career pathway program’ means a program that combines rigorous and high-quality education, training, and other services that—

“(A) aligns with the skill needs of industries in the economy of the State or regional economy involved;

“(B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the ‘National Apprenticeship Act’; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an ‘apprenticeship’, except in section 171);

“(C) includes counseling to support an individual in achieving the individual’s education and career goals;

“(D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

“(E) organizes education, training, and other services to meet the particular needs of

an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;

“(F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and

“(G) helps an individual enter or advance within a specific occupation or occupational cluster.⁴¹

This provision is retroactive and applies “to students who are enrolled or who first enroll in an eligible program of study on or after July 1, 2014.”

- The student has resolved any issues related to drug convictions.⁴²
- The student is not in default on a federal student loan and does not owe the institution or the federal government for an overpayment of student aid (if the student has made a repayment arrangement for the default or overpayment, he or she may be eligible for aid).
- The student maintains “satisfactory progress,” which requires students to keep a minimum grade point average and complete a certain percentage of attempted courses each semester. In addition, maintaining satisfactory progress requires achieving the number of credits needed to earn a postsecondary certificate or degree program within 150 percent of the time normally required for completion (e.g., three years for a two-year associate’s degree program, which is prorated for part-time attendance).
- The student has not completed the requirements for or received a bachelor’s or professional degree.

A student’s Pell Grant amount is primarily determined by his expected family contribution, which is based on student and family earnings. (The formula is: Pell Grant Award = Total Maximum Pell Grant minus Expected Family Contribution. In some cases, the amount may be influenced by the cost of attending the institution.)

For the 2017-18 academic year, the maximum Pell Grant award for a full-time student is \$5,950. Awards are prorated based on enrollment status and the length

of the attendance period. The average new award in 2015-2016 was approximately \$3,792. Pell Grant recipients typically come from very low-income families; 70 percent of recipients in the 2015-16 academic year had household incomes under \$30,000, and 39 percent came from families with income at or below \$20,000.⁴³

Certificate and degree programs are generally eligible for Pell Grants if they meet all these criteria:

- The program is offered by an eligible public or private nonprofit institution of higher education or proprietary or postsecondary vocational institution. This generally means that the institution has legal approval from the state and is accredited or meets an alternative to accreditation standard, as well as certain other requirements.
- The program is at least one year long, provides a degree or certificate upon completion, and results in gainful employment. Certificate programs shorter than one year may be exempt from this criterion if they are included in the institution's list of federally approved non-degree programs (the Eligibility and Certification Approval Report or ECAR). To be eligible for Pell Grants, these shorter certificate programs must be at least 600 clock hours, 16 semester or trimester hours, or 24 quarter hours long and be offered over at least 15 weeks of instruction.⁴⁴
- The program is accredited and approved by the state (unless the accrediting agency or state does not regulate that type of program).

Some states and institutions have worked to ensure students earn “milestone credentials” within career pathway programs that are eligible for Pell Grants.

In **Indiana**, Ivy Tech Community College has worked to make shorter-term (less than one year) technical certificates eligible for student financial aid. It has received approval for 59 certificate programs. In addition to matching program design to eligibility guidelines, Ivy Tech had to gain approval from its accreditation body (the Higher Learning Commission), the Indiana Commission for Higher Education, and the U.S. Department of Education. Each certificate program is composed of courses that are also part of an associate's degree program; this

allows students to earn credits toward an associate's degree if they choose to continue their education.

The **Arkansas** Career Pathways Initiative (CPI) has four key components: clear pathways of continuing education and employment, innovative instructional strategies aimed at improving student retention and completion, comprehensive student support services, and strategic partnerships.⁴⁵ The CPI is funded primarily through the state's Temporary Assistance for Needy Families program. However, CPI program staff help participants apply for Pell Grants and other student aid to augment CPI funds. (Students use financial aid funds to cover tuition, fees, and other costs of attending before accessing CPI funds.)

Since 2004, **Oregon's** Career Pathways Statewide Initiative has aimed to “transform Oregon's education systems to focus on helping youth and adults attain degrees, certificates, and credentials that lead to in-demand occupations, increased wage gain, and lifelong learning.”⁴⁶ In partnership with the state's high school Career & Technical Education Network, the Oregon University System, the Employment Department, and Workforce Boards, Oregon's 17 community colleges have created over 240 types of Career Pathways Certificates and awarded them to over 5,000 students. Community college financial aid directors have approved financial aid guidelines for Career Pathway Certificates. In general, Career Pathway, Less Than One Year (LTOY), and other standalone 12-to-44-credit certificate programs are not eligible for student aid. (The Oregon Initiative operates on a quarter-based hour system, not a semester-based hour system.) However, Career Pathway Certificates and LTOY Certificates are considered “momentum points” in student progression toward the aid-eligible course of study. Students who are enrolled in a course of study that is eligible for financial aid, such as an associate's degree, can also earn a Career Pathway Certificate, LTOY, or other standalone certificate as they complete the required coursework on the way to attaining aid-eligible credentials or degrees.⁴⁷

PROGRAM LIMITATIONS

Pell Grants can cover a wide range of expenses related to postsecondary education and training. However, there are limitations:

- Students must meet all eligibility criteria described above;
- Educational programs must meet all eligibility criteria described above;
- Postsecondary institutions must be eligible to distribute federal Title IV student financial aid;
- Students convicted of drug-related crimes while receiving student aid or who have defaulted on federal student loans can be temporarily or permanently disqualified from receiving Pell Grants.

Although students can theoretically apply for financial aid at any time, it is generally applied for and distributed in semester-based cycles (based on terms or other payment periods for clock-hour and non-term-credit-hour programs). It can take several weeks from the time of application for a student to begin receiving aid, so students and programs must plan ahead.

Students cannot receive Pell Grant awards for more than 12 semesters or its equivalent.⁴⁸ This is prorated for part-time students.

Remedial courses are Pell-eligible only if the student is accepted into an eligible program and takes remedial coursework within that program. Up to one academic year's worth of these courses can be counted in the student's enrollment status for federal aid. That works out to 30 semester or trimester hours, 45 quarter hours, or 900 clock hours. English as a Second Language courses do not count against the one-year limitation on remedial coursework, and, unlike other remedial coursework, ESL courses can offer content below the secondary level and still be Pell-eligible.

OPPORTUNITIES FOR STATES

- Work with financial aid administrators to ensure career pathway programs are structured to match Pell Grant eligibility. Pay particular attention to program length and intensity. If a student is enrolled in and intends to complete a long-term program that is eligible for student aid, then he can also receive aid while earning an interim credential.
- Ensure that low-income students seeking to enroll in credit-bearing career pathway programs apply for Pell.

- Grants to cover tuition and other expenses. Assess how much Pell Grant funding can be expected for career pathways.
- Provide state leadership in helping colleges coordinate multiple funding streams and sources of student aid (e.g., Pell Grants, WIOA Title I funding, TANF dollars) in order to offer students more comprehensive funding packages that can cover the entire cost of attendance (including tuition and fees; living expenses; and student supports, such as child care and transportation).
- Maximize federal need-based financial aid in conjunction with state aid programs.
- Provide state leadership in helping colleges be more assertive in gaining aid eligibility for qualifying shorter-term certificate programs.
- Provide professional development for college financial aid officers, faculty, and staff.

Carl D. Perkins Career and Technical Education Act

Overview: The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) supports secondary and postsecondary programs that build the academic, career, and technical skills of young people and adults. Perkins IV funds can be used to support critical components of career pathways initiatives, including curriculum development, program development, and support services. Federal funding is distributed through Title I of Perkins IV, which supports career and technical education (CTE) activities for both youth and adults. Funding for Title II of Perkins IV, which supports Tech Prep, was eliminated in 2011.

Type of Program: Formula grants to states, with state flexibility to determine the allocation of funds between secondary and postsecondary institutions. States must direct at least 85 percent of the funds to secondary and postsecondary institutions, which may include area career and technical education schools, technical colleges, and community colleges. The remaining 15 percent can fund state administrative and leadership activities.

Eligibility and Targeting: Institutions receiving Perkins IV funds must ensure access for special populations who face difficulty in attaining education and employment. Under the 2006 Act, special populations are defined as:

- Individuals with disabilities;
- Individuals from economically disadvantaged families, including foster children;
- Individuals preparing for nontraditional fields;
- Single parents, including single pregnant women;
- Displaced homemakers, and
- Individuals with limited English proficiency.

Services/Program Support: Perkins IV funds can be used to develop CTE programs and curricula, including a multiyear sequence of courses known as a program of study; develop programs for special populations; provide mentoring and support services for CTE participants; upgrade or adapt equipment designed to strengthen academic and technical skill achievement; and provide professional development opportunities to teachers, administrators, and counselors.

Non-federal Funds: States must maintain non-federal spending on career and technical education at the same level as prior years. States must also match any Perkins IV funds spent on state administrative (but not state leadership) activities using non-federal sources.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

Institutions of higher education can participate in federal financial aid experimental site opportunities. In July 2014, the Department of Education announced a round of experimental sites for three types of innovation: prior learning assessment, hybrid competency-based programs with some direct assessment, and competency-based degrees that are fully direct assessment. Three types of programs could qualify: programs with prior learning assessment, hybrid competency-based programs with some direct assessment, and competency-based degrees that are fully direct assessment. As of January 2015, at least 40 colleges have been selected. Perkins IV can support key components of career pathway initiatives and can be used to drive development of new pathways that lead to jobs in vital economic sectors. Funds also can be used for the initial development and support of the CTE components of career pathway initiatives, typically in coordination with other funding sources.

The 2006 reauthorization requires local funding recipients to deliver at least one program of study as an essential part of their CTE offerings. A program of study is a multiyear sequence of courses, similar to a well-defined career pathway, in a career and technical content area. The sequence:

- Must include academic and CTE content in a non-duplicative progression of courses;
- Must combine secondary and postsecondary program elements;
- May allow for dual or concurrent enrollment in a postsecondary program, and
- Must lead to an industry-recognized credential or certificate at the postsecondary level or to an associate's or bachelor's degree.

Programs of study are career pathways intended to move secondary students toward a postsecondary credential and/or the baccalaureate level. A program of study can be structured in different ways (e.g., as a component of a career cluster, a career academy, or a small learning community) and can have multiple entry points, including opportunities for adult learners.

Resources reserved as state leadership funds (10 percent of the total allocation) are required to fund selected activities, which include developing, improving, or expanding the use of technology in CTE; supporting partnerships among local institutions, adult education providers, and other entities; and providing professional development opportunities for CTE teachers and faculty. In addition to these required activities, allowable uses of these funds include supporting new CTE courses and initiatives, improving career guidance and academic counseling, and developing and enhancing data systems so that states and institutions can track academic and employment outcomes for CTE students.

Perkins IV funds distributed to local institutions (85 percent of the total allocation) can be used for a broader range of activities, including programs that prepare special populations for high-skill, high-wage, or high-demand occupations; the development of quality CTE programs; and the enhanced use of technology in CTE programs. Local recipients may use funds for critical implementation activities, such as providing mentoring and support services, expanding flexible delivery formats to make CTE accessible to all students, and developing or improving CTE courses. Perkins IV funds may also be used to provide direct assistance, including dependent care, transportation, tuition, books, and supplies, so long as the assistance is delivered to members of special populations who need it to participate in CTE activities, is part of a larger set of strategies for special populations, and supplements what is otherwise available from non-federal sources.⁴⁹

In **Washington**, Perkins leadership funds, along with Adult Basic Education funds, were instrumental in the development of I-BEST. In addition, the state has established expectations for all Perkins programs that include meeting the unique needs of adult learners by ensuring that course requirements and necessary skill sets required for obtaining entry into the workforce are well defined and understood.

As part of its five-year plan for Perkins IV, **Ohio** has shifted 3 percent of Perkins Title I funding from second-

ary and postsecondary institutions to activities that support student success and improve a student's likelihood of earning a credential. Institutions are intended to use this funding to identify learning needs and provide appropriate interventions for students who are vulnerable to high school dropout and students who need assistance reentering the education system.

In Illinois, Lake Land College pioneered a unique partnership involving developmental education and occupational programs. An instructor developed a transportation bridge course that helps students who test into developmental reading and writing succeed in the college's for-credit, transportation certificate, and degree programs.

Students concurrently enroll in this bridge course and the transportation occupational programs (e.g., automotive technology, agriculture power technology). The bridge course covers an introduction to the workplace, technical reading applications, industry certification expectations, reading requirement goals, and the use of work-based scenarios to practice appropriate listening, reading, and communication skills. The college's efforts were supported by the Illinois Shifting Gears Initiative.⁵⁰

PROGRAM LIMITATIONS

- Although federal dollars may be used to deliver prerequisite courses, the 2006 legislation excludes funding for prerequisite courses that are remedial.
- Any course funded under Perkins IV must also meet all parts of the new definition of CTE.
- Although Perkins IV funds may be used to support the CTE component of a career pathway initiative, additional federal, state, and local resources (such as adult education and literacy funds) must be used to provide basic skills instruction and other elements of the career pathway.

OPPORTUNITIES FOR STATES

The flexibility under Perkins IV provides ample opportunities for states to create or expand career pathway initiatives, including:

- Align programs of study and overarching career clusters with the workforce and skill needs of regional employers.
- Use program approval authority to drive the development of programs of study and ensure access to the program for adults as well as young people.
- Collect outcome data for adults participating in CTE programs to track transitions to further education and training and into the labor market.
- In conjunction with other federal and state funds, use state leadership funds to initiate career pathway programs.
- Use the authority under the reserve (which may consist of up to 10 percent of funds that are distributed to local institutions) to award grants to secondary and postsecondary institutions.
- Support partnerships involving local schools, postsecondary institutions, and adult education providers to focus on successful transitions—promoting student attainment of academic, career, and technical skills.
- Under WIOA, Perkins is a required one-stop partner.

Temporary Assistance for Needy Families

Overview: Temporary Assistance for Needy Families is more than a cash assistance program. It is a block grant providing flexible funding to states to support a wide range of activities. Almost all components of career pathway strategies can be reasonably justified as promoting the second statutory purpose of TANF, which is to “end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.”

Type of Program: Block grants to states.

Eligibility and Targeting: Most benefits and services are limited to low-income families with children. States set the income criteria, which may vary for different services. Some activities aimed at preventing out-of-wedlock pregnancy and at promoting marriage are not restricted to such families.

Services/Program Support: TANF is a flexible funding stream and may be used for any initiative that reasonably advances one of the law’s stated purposes. There are very few restrictions.

Non-federal Funds: States must continue to spend at least 75 percent of what they spent on Aid to Families with Dependent Children and related programs prior to the creation of TANF (or 80 percent, if they fail to meet TANF’s work-participation requirements). This is known as the “maintenance of effort” (MOE) requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

TANF and maintenance-of-effort funds can be used for a wide variety of activities, including career pathway partnership and curricula development, the ongoing costs of providing education and training, and ongoing supportive services. Such services are not limited to recipients of cash assistance under TANF. The activities should be included in the TANF state plan. TANF support must be proportionate to career pathway participation by TANF recipients and/or other needy families with children. Federal approval from the Department of Health and Human Services (HHS) is not needed.

States have broad flexibility in engaging recipients in work-related activities. However, TANF places restrictions on what activities can be counted toward the federal participation rate for recipients of TANF assistance. States that do not engage a high enough share

of recipients in countable activities for the minimum required number of hours per week are subject to financial penalties.

Participation in a career pathway program can reasonably be counted as either “vocational educational training” or “job skills training directly related to employment.”

Basic education can only be counted as vocational educational training if it is a “necessary and regular part” of a vocational program. In the final rule implementing changes made by the Deficit Reduction Act of 2005, HHS explicitly told states that they could not count a sequence of activities that includes intensive standalone basic education (even when it leads to a vocational program).

Vocational educational training can count for all hours of a recipient’s participation requirement, but it can only be counted for 12 months per recipient. There is also a limit on the share of the caseload that can be counted based on this activity.

Job skills training is only countable when combined with 20 hours per week of a “core activity,” such as subsidized or unsubsidized employment.

To allow TANF recipients to participate in a career pathway program, states may wish to consider allowing recipients to participate in educational activities even when they are not countable toward the federal requirements. They may also consider developing work-study programs and other ways for recipients to combine work and education in a way that supports career pathways participation.

Arkansas has invested approximately \$103.3 million in federal TANF funds since 2005 to help low-income parents earn credentials in career pathways at two-year colleges across the state. The Arkansas Career Pathways Initiative provides a network of case managers at 25 campuses who help low-income parents persist in their studies. TANF funds also help defray a range of expenses related to parents’ participation, including the costs of tuition, child care, transportation, and other student support services.

Kentucky’s \$10.8 million Ready to Work (RTW) initiative helps TANF recipients succeed in community and technical college programs while helping the state meet its TANF work participation rate. In addition to getting help from college-based RTW coordinators at 16 colleges, students can earn additional income and gain work experience in TANF-funded work-study jobs. Work-study students can be placed in on-campus or off-campus jobs with either public- or private-sector employers. These work-study jobs also enable recipients to meet the core 20-hour-a-week federal work participation requirements, even after they reach the 12-month limit on vocational educational training.

PROGRAM LIMITATIONS

- Participants must be members of “needy families,” meaning they must be in families with children and be low income (although the state may set the income criteria, which can be higher than those established for cash assistance).
- TANF funds may not be used to support generally available public education.
- Under TANF, states must meet a federal work-participation rate with regard to recipients of TANF assistance. In most cases, funding career pathways programs will not trigger this requirement. However, transportation and child care provided to non-employed adults is considered to be “assistance.” If the families are not receiving cash benefits, this can trigger time-limit, participation-rate, and data-reporting requirements.
- TANF is a fixed block grant, and the allocations have not been adjusted for inflation since 1996. This is the main barrier to using of TANF funds to support career pathways. Due to the loss of TANF Supplemental Grants and the expiration of the temporary TANF Emergency Fund, many states now receive less TANF funding than in recent years. As most states have committed their allotments to other activities, increasing spending in one area often requires cuts in others.

OPPORTUNITIES FOR STATES

- TANF is a flexible funding source that can be used to support career pathways activities. States should examine their current spending under TANF to see whether unobligated funds are available or if some existing activities would be supported more appropriately with other funding sources.⁵⁶
- State funds spent on career pathways may be countable toward the TANF MOE requirement to the extent that they benefit needy families and represent new spending (compared to 1995 levels). “Excess” MOE spending beyond the amount required may be used to reduce the effective work-participation-rate requirement.

- States should consider strategies to expand access to education and training for TANF recipients. One way to accomplish this is to allow participation in educational activities to count toward state requirements (even when not countable toward the federal rate). States should define the countable activities (vocational education, job skills training, and education related to employment) to include career pathways components and should develop work-study programs and other opportunities for recipients to combine work and education.
- WIOA, which has a strong emphasis on career pathways programs, makes TANF a mandatory partner unless governors choose to opt out. As a partner, TANF agencies would provide access to services and be an integral partner in supporting the infrastructure and operation of one-stops. Partnerships between TANF and one-stops may enable more efficient use of resources and improved services for individuals who face significant barriers to employment. States should consider how a collaboration between TANF and one-stop centers can best use shared resources and career pathways strategies to support TANF recipients.
- To encourage broader adoption and evaluation of promising approaches and address impediments to the use of the career pathways approach among TANF agencies, HHS should issue formal guidance to clarify how activities under the career pathways approach can be countable for the purpose of the work participation rate and that TANF funds may be used to finance the career pathways approach.⁵²

Supplemental Nutrition Assistance Program Employment and Training

Overview: Supplemental Nutritional Assistance Program Employment and Training (SNAP E&T; formerly known as Food Stamps Employment and Training, or FSET) funds can be used to support a variety of education, training, employment, and related services for SNAP recipients. Federal administration of the SNAP E&T program is housed within the Food and Nutrition Service of the U.S. Department of Agriculture.

Type of Program: Grants to states and federal reimbursement to states. The SNAP E&T program includes two main types of funding: 100 percent federal funds and 50 percent federal reimbursement funds.

Under the first type of funding, each state receives a capped allotment of 100 percent federal funds to provide SNAP E&T services (other than participant reimbursements). This allotment is very low compared to the total number of potentially eligible SNAP recipients. In many states, it is entirely consumed by job search activities and referrals to education and training that are also funded from other sources. States can also qualify for additional 100 percent federal funds, known as Able Bodied Adults Without Dependents (ABAWD), who would otherwise be at risk of losing SNAP benefits due to a time limit that restricts them to three months of SNAP in a three-year time span if they are not working or participating in a work activity.

Under the second type of funding, states can claim 50 percent reimbursement for non-federal spending on SNAP E&T activities. This is not capped. To draw down these funds, states must include a description of these activities and a proposed budget in a SNAP E&T plan. The Food and Nutrition Service must approve the plan.

Eligibility and Targeting: Participants must be recipients of SNAP benefits and not Temporary Assistance for Needy Families recipients. In general, SNAP recipients must have gross monthly incomes under 130 percent of the federal poverty level and have assets under defined limits. In some states, services further target “able-bodied adults without dependents” who are at risk of losing SNAP eligibility if they are not participating in a work-related activity. Some states impose additional criteria, such as targeting certain regions.

Services/Program Support: SNAP E&T funds can support operating costs of education and training programs, support services for participants, and job retention services for up to 90 days.

Non-federal Funds: States receive a limited allotment of 100 percent federal funds and must provide a match to receive the 50 percent federal reimbursement funds. Third-party (non-governmental) expenditures may be claimed as state spending for this purpose, contingent upon approval by the Food and Nutrition Service.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

SNAP E&T supports education and training activities for SNAP (Food Stamp) recipients and is quite flexible with respect to eligible programs. SNAP E&T can pay for the costs of operating education and training programs, including basic skills instruction, as long as the program or service is not available to the participant at no cost through another government program or private source. The federal government will share half the cost of reimbursing recipients for a wide range of expenses related to participation in a SNAP E&T component, such as the costs of dependent care, transportation, uniforms, books, safety equipment, interview clothing, test fees, and supplies. In a provision added by the Food, Conservation, and Energy Act of 2008 (P.L. 110 - 234), SNAP E&T funds can also be used to provide job retention services for up to 90 days after an individual who received employment and training services under SNAP E&T gains employment.

In the past, states mostly claimed reimbursement for direct state and local expenditures under the 50 percent reimbursement funding stream. In recent years, a number of states have developed processes to claim expenses incurred by community colleges and other not-for-profit organizations under contract to the state agency operating SNAP E&T. These are sometimes referred to as “third-party match” programs.

Since 2005, [Washington](#) has operated a third-party match SNAP E&T program called Basic Food Employment and Training (BFET). The program includes partnerships between community colleges and community-based organizations (CBOs) that provide participants with support services. The non-federal funds spent on support services for SNAP E&T students by CBOs are allowable expenses to claim for the federal 50 percent reimbursement. Expenses claimed by community colleges for the SNAP E&T 50 percent reimbursement can include tuition, mandatory student fees, books, and specific administrative costs associated with running BFET, as long as these charges are consistently applied to other grants or charged to the general public. The Food and Nutrition Service does not allow reimbursement for

expenses above and beyond what the general public or other grants pay (e.g., state funding to community colleges for instruction is not an allowable reimbursement expense).

In [Fresno, California](#), the Fresno Bridge Academy, a program of the nonprofit Reading and Beyond, accesses SNAP E&T resources to help eligible unemployed and underemployed adults become job ready and undertake job searches. In the 18-month program, individuals work one on one with a case manager who helps develop individual goals; offers workshops on soft skills, such as resume writing and interviewing; and provides wraparound services to meet needs that affect workforce success (e.g., transportation). Foundation funding supplements services that are not funded by SNAP E&T resources. The Bridge Academy partners with local schools to provide vocational training for participants. Bridge Academy participants can enroll in various training programs (e.g., medical assistance, administrative, manufacturing) to receive their certifications in a period of 8 to 18 months, after which case managers help place them in jobs.

PROGRAM LIMITATIONS

- Historically, many SNAP E&T programs have not been robust education and training offerings. They have largely been designed to provide an activity for participants who are unemployed and mandated to participate in a SNAP E&T program to maintain food stamp benefits.
- Participants must be assessed for appropriateness and enrolled in SNAP E&T programs to receive services and be counted toward the reimbursement. They cannot be assumed to be eligible for services based on SNAP receipt. SNAP E&T funds cannot be used to provide services to individuals receiving TANF cash assistance.
- Federal grant programs, including the SNAP E&T program, cannot be charged more for services than the general public pays. Therefore, when states are considering which expenses to claim for the 50 percent reimbursement, they must ensure that these

claimed expenses are consistent with what the public pays or what is charged to other federal, state, or local grants. Student tuition, mandatory student fees, case management, course books, transportation, and child care are generally considered allowable expenses. It is not allowable to claim the amount of funding a state provides to an institution.

- There is no statutory or regulatory limit on how long a SNAP E&T component may last, but it is clear that the Department of Agriculture thinks of the program as providing short-term skills training for unemployed individuals. However, P.L. 110-234 clarified that individuals may volunteer to participate for more than 30 hours a week. This flexibility allows SNAP E&T funds to be used for more robust education and training activities for individuals who are employed in low-wage jobs.

OPPORTUNITIES FOR STATES

- The 50 percent reimbursement stream can be a significant, flexible source of federal funding. States are reevaluating the types of supports they would like to provide under these programs, and a few are offering more robust education and training offerings. Some states, such as Washington and Minnesota, have implemented innovative SNAP E&T programs where community and philanthropic stakeholders are essential partners for providing funding and services for E&T participants. In areas where E&T programs can be strengthened, states can look to best practices to inform development of more robust offerings.
- Because SNAP E&T dollars can be used to serve low-income individuals who do not have children, SNAP E&T is a valuable complement to TANF, which only funds services for low-income families with children.
- When Congress reauthorized the SNAP program in 2014, it included \$200 million to create and evaluate three-year pilot projects testing innovative SNAP E&T programs in up to 10 states. These programs are designed to help SNAP recipients enter the workforce, increase their earnings, and ultimately reduce their SNAP participation. These pilots will

be influential in informing future policymaking on SNAP E&T programs. FNS will announce the ten pilot projects in February 2015. States should closely follow the progress and lessons of these pilots and assess whether any (or a combination) of the strategies may be effective in their states.

Appendix: Federal Funding for Support Services

This appendix provides additional information on how a wide variety of federal sources can be used to fund support services for participants in career pathway initiatives. Adequately funding these services emerged as a significant challenge as states began to use Funding Career Pathways as a tool for braiding funding. This appendix provides additional guidance to help interagency state teams identify and use federal resources to fund the support services components of career pathway programs. State teams can use this appendix to:

- Understand the types of support services that are important for participants in career pathways;
- Identify how federal resources can support these key components and tasks, and
- Pinpoint state policy changes or other state actions needed to maximize federal funding opportunities for support services.

Highlighted in this section are four categories of support services and a matrix outlining the potential use of ten federal programs for support services. To more fully explore opportunities to use federal funds for these services, it includes three federal programs that are not profiled in the toolkit itself.⁵³

The 10 federal programs included in this appendix are:

- Workforce Innovation and Opportunity Act, Title I (Adult and Dislocated Worker);
- Workforce Innovation and Opportunity Act, Title I (Youth);
- Workforce Innovation and Opportunity Act, Title II (Adult Education and Family Literacy Act);

- Pell Grants;
- Carl D. Perkins Career and Technical Education (Perkins CTE);
- TRIO, Student Support Services Program (TRIO SSS);
- Temporary Assistance for Needy Families (TANF);
- Community Services Block Grant (CSBG);
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T); and
- Community Development Block Grant (CDBG).

Support services are defined as the range of supports that should be available to students to help them persist in and complete career pathway programs.

THE OPPORTUNITIES OF FULLY INTEGRATING SUPPORT SERVICES

Federal programs provide critical funding that helps states, as well as education and training providers, offer the support services necessary for nontraditional students to persist in and complete their programs of study. To use federal resources most effectively, states and local providers should:

- **Take an entrepreneurial approach to providing and finding resources for support services.** This includes seeking and securing philanthropic and other private funds for support services; engaging in unique partnerships to provide these services (e.g., with AmeriCorps, civic organizations, and libraries); and considering technology solutions (e.g., through online career explorers and navigators). Supplementing public funding for support services with these atypical resources and partnerships can stretch limited public dollars.
- **Braid together funding sources to provide support services.** Because of limits on how funds may be used, programs with a diverse customer base may need to braid funding from different streams in order to provide the full range of needed services. Some programs have found that they need a dedicated staff member or a reliable partner who can organize and blend these streams into a cohesive funding scheme while meeting the specific requirements of each program. Dedicating staff to braid funding, including assembling, managing, and accounting for public funds, can be challenging if programs are already understaffed.⁵⁴
- **Form partnerships to bring together resources necessary for providing support services.** Many partners in career pathway efforts or potential partners in the community offer or have the capacity to offer some support services. Community-based organizations, one-stop career centers, and human services agencies may already provide career counseling and financial assistance for child care, transportation, or other expenses to participants. Community colleges and other postsecondary education entities may provide academic advising and other academic supports. Many of these partners, as well as employers, can assist with finding jobs or arranging internships for participants. The key is to organize

these resources into a cohesive plan that draws on the strengths of all relevant partners.⁵⁵

Support services are frequently underfunded components of career pathways and may be seen as add-ons rather than as vital supports necessary for students to persist in their coursework and complete their programs of study.⁵¹ Though many support services are allowable activities of federal programs, a lack of funding and misaligned accountability systems may lead program administrators to use scarce funds for other priorities.

CATEGORIES OF SUPPORT SERVICES

This appendix describes four types of support services:

- Financial stability support;
- Personal support;
- Academic support; and
- Career preparation support.

These categories encompass a full range of supports that should be available to help students persist in and complete career pathway programs. Depending on their individual circumstances, income, and other indicators of eligibility, students may benefit from services in only one category or in multiple categories.

Financial Stability Support includes financial support that falls outside the traditional system of financial aid. The purpose of this support is to ensure students can meet the financial demands of participating in career pathway programs. The cost of participation can be much more than the amount adults and youth pay in tuition and fees. Books and other training and educational expenses increase the cost to participants, and the opportunity cost of spending time in training rather than working is significant. Student parents must often pay for child care in order to attend training. In addition, they must continue to meet basic living expenses—rent, utilities, food, transportation, and health care—for themselves and their families. In some cases, career pathway participants experience unexpected financial emergencies, such as a car that requires repair.⁵⁶ For low-income individuals, these issues can serve as roadblocks to completing career pathway programs. One strategy for improving students' financial stability is to help them

secure public support. Low-income students frequently qualify for federal programs designed to assist low-income individuals. These programs can increase financial support for adults and youth and help them care for their families, and they may help them reduce their work hours while enrolled in training. Financial assistance may include, but is not limited to, food assistance through the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and the free and reduced-price school lunch program for children; cash assistance through Temporary Assistance for Needy Families (TANF) and state general assistance programs; subsidized health insurance, most frequently

through Medicaid or the Children’s Health Insurance Program (CHIP); and housing assistance through the Section 8 Program and other housing programs.

The table below shows the range of financial stability support that should be available to participants in career pathway and bridge programs.

CATEGORIES OF FINANCIAL STABILITY SUPPORT	DEFINITIONS
Assistance accessing traditional financial aid	Information about and assistance obtaining various sources of financial aid, including federal and state grants, such as federal Pell Grants, as well as information about student loans
Assistance using nontraditional sources of aid to pay for education and training	Assistance accessing and paying for the direct costs of training and education, such as tuition, books, and fees, from sources other than traditional financial aid. These may include private or institutional scholarships, TANF, or federal programs that offer individual tuition support.
Funding for child care and transportation	Assistance with paying for or providing child care and transportation services for students
Funding for living expenses ⁵³	Assistance with meeting living expenses, such as rent, utilities, food, and health care, for participants and their families

Personal Support assists participants in addressing non-financial, nonacademic barriers to academic progress, so that they can fully engage in their learning. These supports address the challenges that arise as students balance the demands of training participation, work, and family. If these services are not available at the community organization or college campus, students may have to be referred to off-site services.

counseling to address a mental health issue could quickly become a financial crisis. Additionally, an individual who does not have the knowledge or skills to manage debt, follow a budget, and plan financially for the future is likely to experience challenges meeting financial responsibilities. Effective financial coaching and education could mitigate these challenges.

Personal support has implications for the financial stability of program participants. For example, for a student who does not have affordable health care, accessing

The table that follows shows the range of personal support that may be available to participants in career pathway and bridge programs.

CATEGORIES OF PERSONAL SUPPORT	DEFINITIONS
Mentoring	One-on-one relationships between participants and experienced adults who can provide help and advice about navigating academic and employment challenges
Case management	One-on-one assistance to participants meant to optimize financial, personal, and academic outcomes through needs assessment, resource identification, referrals, and service facilitation
Mental health, substance abuse, or other counseling	Counseling for domestic violence, mental health, substance abuse and other personal obstacles
Group support (group counseling, learning communities, cohort support)	Use of groups to support participants, often with similar characteristics, such as student parents, first-generation students, and disadvantaged students. This may include group counseling and learning communities that are designed to provide peer-to-peer support to cohorts of students.
Financial coaching/financial literacy workshops	Assistance with budgeting, financial goal setting, saving, accessing financial products, building assets, understanding financial opportunities and consequences, and strategies for improving an individual's financial situation

Academic Support helps participants meet the academic requirements of career pathway programs. Many adults and youth enter career pathways unprepared to complete the academic work or fail to understand what is required of them. They may be the first in their family to attend such a program, or they may be returning to education and training many years after finishing high school. These supports help students plan for a program of study

and its requirements and provide them with the study skills and course support needed to succeed. These supports help students plan for a program of study and its requirements and provide them with the study skills and course support needed to succeed. The table below shows the types of academic support that can help students persist in and complete their programs of study.

CATEGORIES OF ACADEMIC SUPPORT	DEFINITIONS
Integrated education and training	Individual or group assistance with course concepts, completing assignments, or remedial work
Academic advising (e.g., course planning)	Information and guidance on planning a course of study and selecting courses and instructors
Academic preparation and course support (e.g., study skills)	Preparation of students to meet program expectations; includes teaching study skills and how to access college and community resources, integrated education and training to provide concurrent and contextualized foundational skill building workforce preparation and occupational training.

Career Preparation helps participants use the knowledge and skills they acquire in their training to plan for a career pathway and secure employment. Students identify their interests, explore careers, and develop plans. They may also need assistance with securing an internship or other work-based learning opportunity

while they are enrolled and with finding a job at the end of the program.

The table below describes three types of career preparation.

CATEGORIES OF CAREER PREPARATION	DEFINITIONS
Career navigation	Assistance understanding job and career information, assessing career interests, exploring career options, understanding various steps in a selected career, and developing career plans
Job search assistance and placement	Assistance with preparing a resume, preparing for interviews, understanding the job market and recent trends, understanding the job search process, identifying employment opportunities, and getting placed into jobs
Assistance gaining work experience, searching for an internship, and getting a placement	Developing or identifying work experiences (e.g., summer employment opportunities, internships related to the course of study, and work-study placements) and getting placed into jobs

The matrix on the following page is a guide to the support services that can be funded by 10 federal programs administered by 5 federal departments:

The U.S Department of Labor

- Workforce Innovation and Opportunity Act (WIOA), Title I (Adults and Dislocated Worker)
- Workforce Innovation and Opportunity Act, Title I (Youth)

The U.S. Department of Education

- Workforce Innovation and Opportunity Act, Title II (Adult Education and Family Literacy Act)
- Pell Grants
- Carl D. Perkins Career and Technical Education (Perkins CTE)
- TRIO, Student Support Services Program (TRIO SSS)

The U.S. Department of Health and Human Services

- Temporary Assistance for Needy Families (TANF)
- Community Services Block Grant (CSBG)

The U.S. Department of Agriculture

- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

The U.S. Department of Housing and Urban Development

- Community Development Block Grant (CDBG)

A solid circle on the matrix indicates that a funding source is generally or commonly used to provide the support to eligible participants. A hollow circle indicates that a funding source can be used to provide the support, but it may not be used widely as a result of limited funding, program eligibility requirements, or other reasons. Federal funding for most of the programs profiled in this appendix does not go directly to an individual; rather, it flows to states, cities, educational institutions, or local programs, which can provide the support directly to the participant or pay for the support on behalf of the participant. State teams should use the matrix in conjunction with the lengthier descriptions of most of the programs in the body of this toolkit, along with the notes following the matrix, which provide information on program-specific eligibility requirements, allowable activities, and other limitations on program-specific eligibility requirements, allowable activities, and other limitations.

Federal Funding for Support Services in Career Pathways

PROGRAM	FINANCIAL STABILITY SUPPORT				PERSONAL SUPPORT				ACADEMIC SUPPORT			CAREER TRANSITION			
	Funding for living expenses	Funding for child care and transportation	Assistance using nontraditional sources of aid to pay for education and training	Assistance accessing traditional financial	Financial coaching/ financial literacy workshops	Group support (e.g., group counseling, learning communities)	Mental health, substance abuse or other counseling	Case management	Mentoring	Integrated Education and Training	Academic advising (e.g., course planning)	Academic preparation and course support (e.g., study skills, integrated education and training)	Career navigation	Job search and placement	Assistance gaining work experience, internship search, and placement
WIOA Title I Adult & Dislocated Worker	○	○	○	○	○	●	○	○	○	○	○	○	○	○	○
WIOA Title I Youth	○	○	○	○	○	●	○	○	○	○	○	○	○	○	○
WIOA Title II	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
Pell Grants	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
Perkins CTE	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
TRIO SSS	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
TANF	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
CSBG	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
SNAP E&T	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
CDBG	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○

● Funding source is commonly used for the specified support service

○ Funding source can be used for the specified support service, but is not widely used due to limited funding, program restrictions, etc.

LIMITATIONS ON THE USE OF TEN FEDERAL PROGRAMS TO FUND SUPPORT SERVICES

(to be used in conjunction with the preceding matrix)

Workforce Innovation and Opportunity Act, Title I

(Adult and Dislocated Worker Programs): These WIOA funds can be used for a range of financial, personal, academic, and career transition supports, such as tuition assistance, career counseling, job search assistance, and assistance with gaining work experience. Supportive services under WIOA, which include funding for transportation, child care, dependent care, and other services, are restricted in several ways. They must be necessary to enable an individual to participate in services, and individuals must be unable to obtain these services through other programs. Needs-related payments may be provided to adults and dislocated workers who qualify for them and who require them to participate in services. Supportive services and needs-related payments are optional and may not be available to WIOA participants in every local area because of limited funding or local policy choices.

Workforce Innovation and Opportunity Act, Title I

(Youth Program): WIOA youth funds serve out-of-school youth aged “16 to 24 and in-school youth ages 14 to 21” most of whom must meet specific income-eligibility requirements or live in high-poverty areas and face barriers to continued education and employment. Supports provided depend on the specific service strategy designed for each participant, based on an individualized needs assessment. One of the 14 required program elements is supportive services, including child care, transportation, dependent care, housing, and needs-related payments. These supports are provided when necessary to participate in youth activities. Youth participants may also receive a range of other WIOA-funded financial, personal, academic, and career transition supports, such as tuition assistance, career counseling, and assistance with gaining work experience.

Workforce Innovation and Opportunity Act, Title II (Adult Education and Family Literacy Act): When awarding WIOA Title II grants to local adult education provid-

ers, states must consider whether supportive services (e.g., child care or transportation) are available to enable individuals to attend and complete programs. Due to limited funding under WIOA Title II, supportive services linked to these programs are often funded with other sources, such as through partnerships with local community-based organizations or community colleges. In addition, an increasing number of states and local providers are hiring “transition coordinators” to help students transition from basic skills courses to postsecondary education or training. Transition coordinators may help participants complete financial aid applications, navigate career choices, or connect to community resources or federal benefits for which they may be eligible. Though adult education students may also be enrolled in postsecondary institutions, instruction funded by Title II can only support coursework below the postsecondary level.

Pell Grants: Pell Grant recipients must: demonstrate financial need (as calculated using information on the Free Application for Federal Student Aid, or FAFSA); be a U.S. citizen or an eligible noncitizen; have a high school diploma or its equivalent or be a student in an eligible career pathway program and qualify through a test score, earning 6 college credits toward an academic award, or another state-specified process (or be an eligible home-schooled student); have resolved any issues related to drug convictions; not be in default on a federal student loan; make “satisfactory progress” in his or her academic program; and not have completed requirements for or earned a bachelor’s degree or higher. If any Pell Grant funds remain after the college applies this and other student aid to tuition and fees, the student gets a refund check and may use these funds to pay for books and supplies necessary for their programs, as well as room and board, child care, and transportation expenses. Students may experience delays in receiving aid due to FAFSA processing time requirements by the U.S. Department of Education and the postsecondary institution. Students may not receive Pell Grants for more than six academic years (prorated for part-time students). Some shorter vocational programs may not qualify for student aid. Practitioners should work with student aid administrators, college deans, and faculty to

maximize program eligibility for student aid, especially for career pathway programs.

Carl D. Perkins Career and Technical Education (Perkins CTE): Perkins CTE funds can be used for programs that include a broad range of personal, academic, and career transition supports, such as mentoring, the development of learning communities, academic advising, assistance with internships, and career development. However, the ability to provide direct assistance to individuals is strictly limited. Direct assistance is defined to include tuition, books, supplies, child care, dependent care, and transportation, and it may be provided only to members of special populations who are participating in CTE and require such assistance to address barriers to participation. Direct assistance must also be part of a larger set of strategies to meet the needs of special populations and must supplement, not supplant, assistance that is otherwise available from non-federal sources.⁵⁹

TRIO, Student Support Services (SSS): TRIO SSS is a competitive grant for which postsecondary institutions apply. Competitions for funding take place every five years. Therefore, unless an institution already receives the grant, it may be difficult to access funds. Most SSS programs serve only a small portion of the students who qualify. At each participating institution, the population served by SSS must be two-thirds low-income and first-generation students or students with disabilities. Among those who are disabled, one-third must be low income. To qualify, students must be U.S. citizens and be eligible for Pell Grants. Students who have unmet need after federal financial aid can receive grant aid through SSS or assistance accessing other financial resources. Funds are also used to meet living expenses for a subset of SSS students—those who are homeless, current foster youth, or foster youth who have aged out of the foster care system—to assist them in securing temporary housing during breaks.

Temporary Assistance for Needy Families (TANF): TANF is a highly flexible funding stream that can be used to support all types of support services. However, with limited exceptions, TANF funds may be spent only on benefits and services for members of low-income fami-

lies with children. Because of TANF’s flexibility, there are many competing demands for its use. Many states have adopted “work-first” approaches under TANF that emphasize immediate employment and provide limited support for recipients to attend school. A few states use TANF funds to support education and training-related services for members of low-income families with children regardless of whether they are receiving cash assistance; however, in most cases, services are only provided to families receiving assistance. For more information, see CLASP resources that highlight innovative state strategies for using TANF for education and training participants.⁶⁰

Community Services Block Grant (CSBG): CSBG is a flexible block grant that can be used to provide a wide array of anti-poverty services to individuals with incomes below the poverty level (125 percent of poverty at state option). Funding is allocated to all 50 states and distributed through local grantees, typically Community Action Agencies (CAAs). The CAAs establish program priorities through a community needs assessment and use CSBG funds to address the causes and conditions of poverty in local communities. CSBG is often used to provide support services to participants in career pathway programs to help individuals and families reach self-sufficiency.

Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T): SNAP E&T provides employment-and-training-related services, including some support services, to individuals who are receiving food assistance through SNAP (Food Stamps) and are not receiving TANF cash assistance. SNAP E&T funds may not be used to remediate barriers to employment that would have qualified recipients for an exemption from work registration under SNAP. The SNAP E&T program may not be charged more for services than what is charged to the public or other programs for the same activities. Therefore, it may not be used to pay for activities that are otherwise available to students free of charge. However, it may be used to provide supplemental services that are not otherwise available to training participants who are receiving SNAP. For more information, see CLASP resources that highlight innovative

state strategies for using SNAP E&T for participants in education and training.

Community Development Block Grant (CDBG): Funds from this flexible block grant are predominantly used for developing suitable, affordable housing for low- and moderate-income individuals and families and for other economic development activities that improve communities. CDBG funds are allocated by the U.S. Department of Housing and Urban Development to large cities, urban counties, and states. States, in turn, spend their funds in smaller communities. With few restrictions, grantees have significant flexibility in determining how CDBG funds will be used. Communities may spend no more than 15 percent of the grant on public services, including employment, child care, education, and welfare needs, which may include support services. Many communities spend much less on these activities.⁶¹ The only activities that grantees are expressly prohibited from using CDBG funds to support are overtly political activities and some cash payments.⁶² While funds cannot be allocated directly to individual participants, they could subsidize a program's cost, as long as the program meets eligibility and national objective requirements.

ENDNOTES

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- 13 Tim Harmon, *Shared Accountability in WIOA and Career Pathways*, CLASP, December 2014 http://www.clasp.org/resources-and-publications/publication-1/WIOA_sharedaccountability.pdf
- 14 For a guide to online self-sufficiency tools that have been used by employment programs to focus career counseling on longer term employment goals, see: <http://www.wowonline.org/ourprograms/fess/documents/WOWGuidetoOnlineSelf-SufficiencyToolsFinal.pdf>.
- 15 For more information, see recent guidance issued by the Employment and Training Administration, including Training and Employment Notice No. 36-11 and Training and Employment Notice No. 39-11. These provide career pathways technical assistance resources.
- 16 Bird et al., *Key Provisions of the Workforce Innovation and Opportunity Act (WIOA)*, www.clasp.org/resources-and-publications/publication-1/KeyProvisionsofWIOA-Final.pdf
- 17 Annual appropriations legislation enacted in FY 2011 and FY 2012 reduced the portion of funds reserved at the state level from 15 percent to 5 percent.
- 18 See Career Academy at Baltimore City Schools: <http://www.baltimorecityschools.org/domain/4882>
- 19 Bird et al., *Key Provisions of the Workforce Innovation and Opportunity Act (WIOA)*, www.clasp.org/resources-and-publications/publication-1/KeyProvisionsofWIOA-Final.pdf
- 20 The benefits and services described in this profile are available to workers covered by petitions filed on or after October 21, 2011.
- 21 Robert Lerman, *Proposal 7: Expanding Apprenticeship Opportunities in the United States*, The Brookings Institution, June 2014, http://www.brookings.edu/~media/research/files/papers/2014/06/19_hamilton_policies_addressing_poverty/expand_apprenticeships_united_states_lerman.pdf.
- 22 For a directory of State Offices of Apprenticeship, see <http://www.doleta.gov/oa/stateoffices.cfm>.
- 23 For additional RACC resources, see <http://www.doleta.gov/oa/racc.cfm>.
- 24 DOL Training and Employment Guidance Letter (TEGL) 2-07. <http://wdr.doleta.gov/directives/attach/TEGL/tegl2007/TEGL2-07.pdf>.

- 25 Washington State Board for Community & Technical Colleges. Apprenticeship Fee Guidance (2012-2013). Guidance can be found here: <http://www.sbctc.ctc.edu/college/workforce/2011-13feeguidance.pdf>
- 26 For state examples, see Lerman, Training Tomorrow's Workforce.
- 27 For additional information on NJ Place, see <http://www.rci.rutgers.edu/~njplace/index.html>
- 28 For additional information on Apprenticeship Carolina, see <http://www.apprenticeshipcarolina.com/>
- 29 29 CFR 29.5, <http://www.gpo.gov/fdsys/pkg/CFR-2011-title29-vol1/pdf/CFR-2011-title29-vol1-sec29-5.pdf>
- 30 DOL Training and Employment Guidance Letter (TEGL) 2-07. <http://wdr.doleta.gov/directives/attach/TEGL/tegl2007/TEGL2-07.pdf>.
- 31 "American Apprenticeship Funding Opportunities FAQs" Department of Labor, February 2015, http://www.doleta.gov/oa/pdf/Registered_Apprenticeship_FAQs_2014.pdf
- 32 "Postsecondary level" is not defined in law; however, a common definition that states use is 12.9 grade level.
- 33 For more information, see Amy Ellen Duke and Evelyn Ganzglass, *Strengthening State Adult Education for Low Skilled Workers*, Center for Law and Social Policy, 2007, <http://clasp.org/admin/site/publications/files/0384.pdf>.
- 34 See Use of Funds Provided Under the Adult Education and Family Literacy Act (AEFLA) for Integrated Education and Training (IET).
- 35 Benjamin Collins, *Rehabilitation Act: Vocational Rehabilitation State Grants*. Congressional Research Service, December 30 2014.
- 36 See Section 101(a)(5) of the Rehabilitation Act (29 U.S.C. 721[a][5]).
- 37 For complete list, see Section 103(a) of the Rehabilitation Act (29 U.S.C. 723[a]).
- 38 For more information, see CRS Report R41833, *The Individuals with Disabilities Education Act (IDEA), Part B: Key Statutory and Regulatory Provisions*.
- 39 Information and Technical Assistance on the ADA, About Olmstead, U.S. Department of Justice, http://www.ada.gov/olmstead/olmstead_about.htm
- 40 See Section 484(d)(1) of the Higher Education Act.
- 41 See Section 484(d)(2) of the Higher Education Act.
- 42 See Section 484(r)(2) of the Higher Education Act.
- 43 For more information, see U.S. Department of Education, *FY2018 Budget Request for Student Financial Aid*, <http://www2.ed.gov/about/overview/budget/budget18/justifications/p-sfa.pdf>.
- 44 In December 2011, the U.S. Department of Education announced several new experiments to test alternative methods for distributing federal Title IV student aid under its Experimental Sites Initiative authority. Experiment #2 will test allowing students in short-term training programs of at least 8 weeks in length and at least 150 clock hours that meet local or regional workforce needs. Interested parties should monitor the department's Experimental Sites website for more information.
- 45 See Michael Leach, *The Arkansas Career Pathways Initiative: A New Model for Delivering Postsecondary Training to Adult Students*, Southern Good Faith Fund, February 2008.
- 46 See WorkSource Oregon's website: <http://www.worksourceoregon.org/index.php/career-pathways/113-about-oregon-statewide-pathways-initiative>
- 47 Although the Oregon guidelines do not explicitly mention it, according to federal student aid guidelines, other aid-eligible programs of study can include credit-based certificate programs and short-term, clock-hour certificate programs as defined in this summary.
- 48 This limitation was imposed with the Consolidated Appropriations Act 2012 (Public Law 112-74), passed by Congress in December 2011. Previously, students enrolled after July 1, 2008, were limited to 18 semesters of Pell Grant awards (also prorated). Under current law, all students are limited to no more than 12 semesters of Pell Grant awards.
- 49 For a full list of required and permitted activities that can be carried out with Perkins IV funds, see the legislation at http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=109_cong_bills&docid=f:s250enr.txt.pdf.
- 50 For more information on career pathway bridge programs, see, Julie Strawn, *Farther, Faster: Six Promising Programs Show How Career Pathways Bridges Help Basic Skills Students Earn Credentials That Matter*, Center for Law and Social Policy, 2011, <http://www.clasp.org/admin/site/publications/files/Farther-Faster.pdf>.
- 51 State-by-state information on the use of TANF and MOE funds in 2009 is available at: http://www.clasp.org/resources_and_publications/publication?id=0808&list=publications
- 52 Action Is Needed to Better Promote Employment-Focused Approaches GAO-15-31: Published: Nov 19, 2014. Publicly Released: Dec 19, 2014.
- 53 The list of federal programs that can be used to fund support services profiled in this appendix is not exhaustive. Additional programs tend to target specific populations, including workers who have lost jobs due to foreign trade, veterans, individuals with disabilities, Native Americans, and others facing unique labor market challenges. The appendix draws upon a CLASP resource that outlines how to use federal funding sources for Integrated Service Delivery, a strategy that shares key elements with career pathways. For more information see Federal Funding for Integrated Service Delivery, CLASP, 2011, http://www.clasp.org/admin/site/publications/files/CWF_ALL.pdf.

- 54 For local examples of braided funding, see Maureen Conway, *The Price of Persistence: How Nonprofit–Community College Partnerships Manage and Blend Diverse Funding Streams*, The Aspen Institute, 2011, <http://www.aspeninstitute.org/sites/default/files/content/docs/pubs/11-005.pdf>
- 55 For examples of strong partnerships, see the program profiles in this toolkit and additional reports, including Cynthia D. Liston and Robert Donnan, *Clearing the Financial Barriers to Student Success*, Center for Working Families at Community Colleges, MDC, 2012, <http://www.mdcinc.org/sites/default/files/resources/CWF%20Clearing%20the%20Financial%20Barriers%20to%20Student%20Success%20-%20Complete.pdf>, and Maureen Conway, Amy Blair, and Matt Helmer, *Courses to Employment: Partnering to Create Paths to Education and Careers*, The Aspen Institute, 2012, <http://www.aspenwsi.org/wordpress/wp-content/uploads/C2E.pdf>.
- 56 Recent research has shown that supports in the form of intensive student coaching can increase persistence in programs and increase completion rates. See Eric P. Bettinger and Rachel Baker, *The Effects of Student Coaching in College: An Evaluation of a Randomized Experiment in Student Mentoring*, Stanford University, 2011. There is also evidence of an association between enrollment in student success courses—a form of support services that enhances the study skills of first-time students and orients them to the institution—and positive academic outcomes. See Sung-Woo Cho and Melinda Mechur Karp, *Student Success Courses and Educational Outcomes at Virginia Community Colleges*, Community College Research Center, Teacher’s College Columbia University, 2012.
- 57 Colleges and other providers increasingly cite the need for funding to help students respond to emergencies. This funding may not be available from most federal programs, but it can be instrumental in preventing a student from dropping out or falling behind in coursework.
- 58 This includes both sources like Pell Grants, which can be used for a range of living expenses, and funds limited to one or more of these expenses.
- 59 Special populations under Perkins include individuals from economically disadvantaged families, individuals with limited English proficiency, single parents and others as listed in the lengthier program profile in the toolkit. For more information, see non-regulatory guidance issued on June 2, 2009 by the Office of Vocational and Adult Education, U.S. Department of Education, <http://cte.ed.gov/docs/nonregulatory/PerkinsIVNon-RegulatoryGuidanceQAVersion3.0.pdf>.
- 60 For examples of states using TANF for education and training, see CLASP resources at <http://www.clasp.org/postsecondary/pages?id=0007#state>.
- 61 For more information on the TRIO Student Support Services Program, see Federal Funding for Integrated Service Delivery, a Toolkit, p. 15, http://www.clasp.org/admin/site/publications/files/CWF_ALL.pdf.
- 62 U.S. Department of Housing and Urban Development, “Community Development Block Grant Entitlement Communities Grants,” September 5, 2012, http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs/entitlement#in_eligibleactivities.



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