Background: Two facts have become clear since passage of the Workforce Investment Act in 1998. First, when low-skilled individuals increase their basic skills, these higher skills pay off in the labor market in the form of higher employment and earnings. Second, these earnings increases are typically modest and fall short of what people need to become self-sufficient, even for adult education participants that earn a GED.1 These facts have led a number of states and localities to focus on increasing transitions from adult education to postsecondary education and training. The early results are quite promising:

- The Integrated Basic Education and Skills Training initiative (I-BEST) in Washington State pairs adult education/ESL instructors with vocational instructors to integrate contextualized remediation and English language services with occupational training. I-BEST students earned five times more college credits on average and were 15 times more likely to complete workforce training than other ABE/ESL students. Further, ESL students in I-BEST classes made the same progress learning English language skills as other ESL students did.2
- Kentucky has encouraged and supported local efforts to dual enroll students in adult education and college remediation, enabling them to work toward their GED and complete college coursework at the same time. For example, in Jefferson County (Louisville), the adult education program has partnered with the community college and two local universities to jointly enroll over 5,000 students, enabling 88 percent of them to bypass at least one college developmental education course, saving them time and over $400,000 in tuition costs in 2005-2006 alone. The program retains an impressive 72 percent of its students.3

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3 February 2007 e-mail correspondence with Trish Schneider, Coordinator, Jefferson County Public Schools Adult and Continuing Education.
Adult education students benefit greatly from programs such as those in Washington and Kentucky because they can earn marketable postsecondary credentials more quickly and avoid using up their limited student aid and personal resources on tuition for college remediation, accessing free adult education remediation for their coursework below college level. Many more states and localities could follow their example, but some are hesitant to do so without clearer guidance in this area from Congress. Currently Title II does not reflect this new consensus on the importance of postsecondary transitions for adult education students, and in fact there is much confusion in the field as to whether services that promote transitions are encouraged or even allowed under WIA. The following recommendations are intended to update Title II to support state and local innovations in this critical area, which in turn will increase persistence in adult education, increase transitions to postsecondary programs, and help low-income adults attain marketable postsecondary credentials.

Recommended Changes to WIA Title II

1) **Postsecondary transitions as an adult education goal.** The Senate bill expands the purpose of Title II to include transitions to postsecondary education. We support this change and suggest clarifying that postsecondary education includes occupational training.

2) **Update definitions to include transitions.** If transitions to postsecondary education and training are to be a purpose of adult education and ESL services, then Title II definitions should reflect that. Specifically, we suggest adding workforce bridge programs and postsecondary transition activities to the definition of adult education and adding definitions for each of these activities. A workforce bridge program combines workforce education for a specific occupation or occupational cluster with English language acquisition or other adult education activities, and includes but is not limited to those programs which provide for dual enrollment.

3) **Clarify that Title II does not bar transition activities.** While some states and localities are currently providing workforce bridge programs or postsecondary transition services with Title II funds, there seems to be a common misperception in the field that such services are not allowed under WIA Title II. We suggest adding language to clarify that nothing in the Workforce Investment Act should be interpreted to prohibit workforce bridge programs or postsecondary transition activities, provided that there are mechanisms in place to allocate Title II resources to these activities in proportion to the amount of adult education content in them. For example, if a program integrates English language and job training services, and half of the program’s content is English language instruction and half of it is job-specific skills training, then Title II funds could support half of the program’s costs.

4) **Report postsecondary transition rates for all students.** Currently states only report postsecondary transition rates for students who come into adult education already knowing that they want to go to college or training. This has the effect of making transition rates look much higher than they actually are, as few students enter adult education seeing themselves as college material. It also means local providers do not get credit for one of their most important accomplishments: helping adults gain enough skills and confidence to see that they can succeed as learners and reach higher in their education and career goals. We suggest that states report annually on the total number of adult education students that they help transition successfully to postsecondary education or training and, to the extent practicable, report on student transitions over time (five years).
postsecondary education administrative data, this is not a difficult task; and states that lack that capability would not be required to do it.) At least initially, this data should not be part of the performance accountability system but simply be information that can be used to improve policies and programs.

5) Reduce the barriers to postsecondary transition by aligning assessments. Currently students in workforce bridge or postsecondary transition activities must take two sets of tests both upon entering and exiting a program: the basic skills test used by the college to determine readiness for college coursework, remediation needs, and “ability to benefit” for federal student aid purposes and the basic skills test used by the adult education provider (tests approved by the U.S. Department of Education for adult education performance accountability purposes). In both cases, the lists of tests are intended for use with adults who lack a high school diploma or GED, but most of the ability to benefit tests are not on the list of approved assessments for Title II accountability use. These two sets of different assessments impose a burden of multiple testing on students and providers and make it more difficult for adult education providers and colleges to work together to prepare adult education students for college without the need for further remediation. We suggest that Congress ask the Secretary to convene a group of testing experts and adult education practitioners to work to align these two lists of approved assessments to the greatest extent possible, and to allow at least some of the ability to benefit assessments, or “crosswalks” between them and adult education tests, to be used for accountability purposes under the adult education National Reporting System for students in workforce bridge programs or postsecondary transition activities.

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

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

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4 The “ability to benefit” provision of the Higher Education Act allows individuals without a high school diploma or GED to qualify for student aid if they can achieve a passing score on an approved test to demonstrate their ability to benefit from postsecondary education. The Department of Education issues a list of approved tests and passing scores for colleges to choose from for this purpose.
Legislative language for WIA Title II recommendations to promote alignment and integration between adult education/ESL and postsecondary education and training

(Note: CLASP ideas for new legislative language appear in italics.)

Changes to HR 27 EAS Title II

1. **Sec. 201 Purpose.** Support the Senate bill’s addition of postsecondary transitions to the purpose of the title, but make this new purpose its own goal rather than making it a subset of completion of a secondary school education. Students may not need to complete a high school diploma or GED before transitioning to postsecondary education, since neither federal student aid policy nor many colleges require a high school diploma or GED for enrollment. In addition, many ESL students already have a high school diploma in their native countries. We also suggest adding the word “training” after “education” to clarify that all types of postsecondary education, including job training, are encompassed here.

**Proposed Change:** Amend Sec. 201(b) [which amends 20 U.S.C. 9201] by striking (2) on p. 247, lines 3 through 5, and inserting a new (2) as follows, and redesignate accordingly:

“(2) insert a new number (4) as follows:

“(4) assist adults to transition successfully to postsecondary education and training; and””

2. **Sec. 202 Definitions.** Support the Senate bill’s changes to the definition of adult education and literacy activities and add to that new definition services that promote transitions to postsecondary education and training. Also, clarify that workforce bridge programs and postsecondary transition programs are allowable adult education activities and add a definition of postsecondary transition programs.

**Proposed Change:** Amend Section 202(2) [which amends 20 U.S.C 9202] by inserting “workforce bridge and postsecondary transition activities” before “or other activities necessary” on p. 248, line 8.

**Proposed Change:** Amend Sec 202(10) [which amends 20 U.S.C. 9202] by inserting the following on p. 250, line 20:

““(20) WORKFORCE BRIDGE PROGRAM.- The term “workforce bridge program” means a program that combines workforce education for a specific occupation or occupational cluster with English language acquisition or other adult education activities, and includes but is not limited to those programs which provide for dual enrollment.””

““(21) POSTSECONDARY TRANSITION ACTIVITIES.- The term “postsecondary transition activities” means programs and services to assist adults in transitioning successfully from adult education to postsecondary education or training that leads to recognized credentials and in reducing or eliminating these adults’ need for further remediation. These activities may include dual enrollment in adult education and postsecondary education or
training; workforce bridge programs; contextualization of adult education content to postsecondary education or training goals; and alignment of assessments, curricula, and entry and exit standards between adult education and postsecondary education and training.””

3. **Section 205. New Section.** Clarify that neither the Department of Education nor the states should interpret anything in the Workforce Investment Act to prohibit workforce bridge programs or postsecondary transition programs.

**Proposed Change:** Insert a new Sec. 204 (and redesignate accordingly) on p. 251, line 5, as follows:

“Sec. 204. Add a new section 205 as follows (redesignate accordingly):

“SPECIAL RULE. Nothing in this Act shall be construed to prohibit or discourage the use of funds under this Title for workforce bridge programs or for postsecondary transition activities provided that there is an appropriate mechanism in place for allocating funds from this Title to the program or activity in proportion to the amount of reading, writing, speaking, mathematics, or English language acquisition content included in it.”

4. **Section 206. Performance Accountability System.** Require reporting on the total number of all adult education participants transitioning to postsecondary education or training in each year.

**Proposed Change:** Amend Sec. 206 (2)(A)(ii) [which amends 20 U.S.C. 9212] by adding a new (E) on p. 261, line 24 as follows:

““(E) The total number of all adult education participants transitioning successfully to postsecondary education or training that leads to recognized credentials and, to the extent practicable in a state, the number transitioning successfully over time within five years of adult education participation. Such annual and longitudinal data shall not be part of the performance accountability system until and unless the Secretary determines that is appropriate to add it.”

5. **Section 206. Performance Accountability System.** Add a new requirement that the Secretary convene a group of testing experts and adult education practitioners to work toward aligning college remediation assessments used for Ability to Benefit purposes and Title II-approved assessments so that to the greatest extent possible the same assessments may be used for enrolling individuals in workforce bridge and postsecondary transition activities, especially those that offer dual enrollment.

**Proposed Change:** Amend Section 206 (3) [which amends 20 U.S.C. 9212] by adding the following on p. 263, line 8:

““(e) PROMOTING POSTSECONDARY TRANSITIONS THROUGH ALIGNMENT OF ASSESSMENTS.- The Secretary of Education shall convene a workgroup of testing experts and adult education practitioners to make
recommendations to the Secretary on ways to align to the greatest extent possible the assessments approved for use under Sec. 484(d) of the Higher Education Act with assessments approved for performance accountability purposes under this Title in order to reduce the burden of multiple testing on students and on providers and to facilitate transitions to postsecondary education or training. The work group may also examine the use of crosswalks between assessments approved for Sec. 484(d) and those approved for use in this Title’s performance accountability system as a means of alignment. The work group shall report to the Secretary no later than one year after passage of this Act.”

6. **Section 212. Grants and Contracts for Eligible Providers.** Amend Sec. 212 to clarify that workforce bridge and postsecondary transition activities may be part of the adult education services that local providers choose to offer, and add a new requirement that states take into consideration whether a local provider offers workforce bridge programs or postsecondary transition activities in awarding adult education grants or contracts.

**Proposed Change:** Amend Sec. 212 (1)(A) [which amends 20 U.S.C. 9241] by inserting “, workforce bridge programs, and postsecondary transition activities” after “workplace literacy programs” on p. 276, line 3.

**Proposed Change:** Amend Sec. 212(2)(B) [which amends 20 U.S.C. 9241] by inserting the following on p. 276, line 21, and redesignate accordingly: “(4) whether the eligible provider offers workforce bridge programs or postsecondary transition activities;”

7. **Section 217. National Leadership Activities.** Add a new paragraph to Sec. 217 [which amends 20 U.S.C. 9253] to encourage national leadership in providing technical assistance on workforce bridge programs and postsecondary transition activities, especially with regard to assessment.

**Proposed Change:** Insert a new paragraph (F) after (E) on p. 287, line 8, as follows:

“(F) assistance for the purposes of developing, improving, identifying, and disseminating the most successful methods and techniques for providing workforce bridge programs and postsecondary transition activities, including developing approved crosswalks of commonly used adult education, English language, and postsecondary education and training assessments.”"