National Coalition For Literacy

Honorable Congresswoman Virginia Foxx
Chair, Subcommittee on Higher Education and Workforce Training
1230 Longworth House Office Building
Washington, D.C. 20515

Dear Congresswoman Foxx:

On behalf of the National Coalition for Literacy, a coalition of 29 foremost national and regional organizations dedicated to advancing adult education, family literacy, and English language acquisition in the United States, I am writing to share our concerns with *Streamlining Workforce Development Programs Act of 2011*, H.R.3610. While we are pleased to see a recognition of the need for alignment between adult education and workforce training as well as the need to improve efficiency and effectiveness, we strongly urge you to incorporate three major recommendations concerning adult education (Title II) as WIA reauthorization progresses in the House.

1) **The allowance for states to consolidate federal funding with other funding streams under an approved unified plan would drastically reduce the provision of services to adults with low levels of literacy.** Section 117 of the H.R. 3610 allows for states to consolidate their federal allotment of adult education funds and other funding streams into a newly-created Workforce Investment Fund. Furthermore, it allows for these funds to be treated as though they are Workforce Investment Fund dollars, eliminating requirements under the Adult Education and Family Literacy Act to serve adults with low basic skills to become literate, obtain the knowledge and skills necessary for employment and self-sufficiency, and complete their secondary school education.

   Adult education students often have different and unique needs than higher-skilled workers that are unlikely to be addressed in a traditional job training program. Forty-one percent of adult education students have limited English skills, nearly 50-80 percent may have learning disabilities, and the majority are unemployed. In an era of scarce resources, a consolidated approach to education and training programs that serves all workers will inevitably leave behind those workers with the highest need or are the hardest to serve.

   - **Recommendation:** Remove "programs under Title II of the Workforce Investment Act" from the allowance to consolidate funding at the state level.

2) **While the Coalition supports alignment across the core programs in the Workforce Investment Act, key provisions in the Foxx bill would remove program incentives to serve students with low levels of literacy.** The Coalition places a high priority on alignment between the activities in Title I and Title II. Specifically, we support establishing goals for co-enrollment; establishing shared accountabilities for serving adult education students; explicitly allowing career pathways, integrated education/training and dual and concurrent enrollment; and creating a new funding stream to support a career pathways leadership grant program to be jointly administered by the Departments of Education and Labor.

While the provisions in this bill that support a unified plan could help states work toward these alignment priorities, the existing performance accountability system in the bill is too focused on outcomes for workers and learners with higher-level skills. Students in adult education, particularly those at the lowest skill levels, may take more than one year to become employed, receive a postsecondary credential, or receive a secondary school diploma or its recognized equivalent. In 2010, 46 percent of the two million adult learners in adult education began their program with less than 9th grade level skills (National Reporting System, 2012). The current performance accountability measures in H.R. 3610 would sanction, not reward, programs that served these students with the greatest need.

- **Recommendation:** Add an additional performance accountability measure to Sec.114. Performance Accountability System (1)(A): *(V) the percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measureable skill gains toward such a credential or employment.*

3) **Repeal of the National Institute for Literacy (NIFL) would leave the adult education system with no centralized resource for adult education research and best practices.** The de-funding of NIFL in FY2010 was a tremendous loss to the adult education field. Unlike elementary/secondary education and higher education, there is a scarcity of research on best practices for serving low-skilled adult learners. Also unlike these higher-profile systems, there are no private and independent national adult education research centers to fill this void. The previous center that conducted research on adult education, the National Center for the Study of Adult Learning and Literacy (NCSALL) has not been in operation since 2007. There are also only a very limited number of graduate-level adult educator programs from which new research emerges. Although NIFL is currently not funded, repeal of authorizing language for the Institute sends a message that adult education programs and teachers are somewhow a "second-class" education system and would perpetuate this lack of important research for the field. The loss of the Institute would deprive the field of research and the most relevant information available on effective instruction, limiting practitioners' efficiency to deliver services to students.

- **Recommendation:** Remove language from Title II, Sec. 201 (25)that repeals the authorizing language for the Natonal Institute for Literacy.

Thank you for your consideration. We look forward to learning whether you will incorporate these recommendations going forward. If you have questions, please contact our Advocacy Chair, Jackie Taylor, at Jackie@jataylor.net .

Sincerely,



Martin Finsterbusch
NCL President 2011-2012

CC: Congressman Phil Roe, Congressman Ruben Hinojosa, Congressman John Kline, Congressman George Miller