



National Coalition for Literacy

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The National Coalition for Literacy (NCL) appreciates the opportunity to provide responses to the Senate HELP Committee WIOA discussion draft. NCL is an alliance of the leading national and regional organizations dedicated to advancing adult education, family literacy, and English language acquisition in the United States. NCL carries out its mission by increasing public awareness of the need to expand programs and funding; by promoting effective public policy; and by serving as an authoritative resource on national adult education issues.

NCL has worked extensively with Senate HELP Committee staff and other Senate staffers over many years to increase the relevance and effectiveness of the Workforce Innovation and Opportunity Act. Our feedback below reflects our appreciation for the ways the current draft incorporates earlier recommendations and staff's receptivity to suggestions based in our expertise. We have followed the provided template for our responses, including section references for both the Senate HELP draft and the existing WIOA legislation to reduce confusion (mainly our own).

[p. 5, Line Number 8, Draft Section 102, WIOA Section 3]

- Feedback #1: In Section 3, after the definition of "Chief Elected Official", insert "(10) COLLEGE AND CAREER NAVIGATOR.— The term "college and career navigator" means a professional with experience and expertise in providing preparation activities that support adults and youth in identifying education and work opportunities and identifying the skills, knowledge, and training they require." Renumber the subsequent subparagraphs accordingly.
- Brief context: Supports the involvement of college and career navigators in title I and title II activities (see feedback #16 and feedback #23 below). These professionals possess a combination of specialized knowledge and skills that makes them uniquely effective in guiding adults and youth to identify and achieve goals.

[p. 6, Line Number 14, Draft Section 102, WIOA Section 3]

- Feedback #2: After line 14, insert "(F) In subparagraph (J), as so redesignated, by striking "low levels of literacy," and inserting "foundational skill needs,";" (to read "individuals who have foundational skill needs")

- Brief context: Allows reference to all skills, including numeracy and digital skills, and aligns with the addition of “have foundational skill needs” (page 14, lines 6 and following) to replace “is basic skills deficient” and similar out of date terminology.

[p. 8, Line Number 6, Draft Section 102, WIOA Section 3]

- Feedback #3: After “;” insert “(vi) 1 or more representatives of adult education providers;”.
- Brief context: This addition calls out adult education providers as pivotal members of the education community with roles equivalent in importance to those of other members of that community in the context of industry and sector partnerships.

[p. 11, Line Numbers 10-13, Draft Section 102, WIOA Section 3]

- Feedback #4: Change “co-enrollment” to “concurrent enrollment”
- Brief context: WIOA Sections 205, 225, 232, 242 use “concurrent enrollment.” ESEA uses “dual or concurrent enrollment” throughout, with definition at Sec. 8002(15), and Perkins V cites the ESEA definition at Sec. 3(15). Recommend consistency here with other education laws; otherwise, make the change in Section 205 et seq.

[p. 11, Line Numbers 14-17, Draft Section 102, WIOA Section 3]

- Feedback #5: Between “(20 U.S.C. 9101)” and the period, insert “and includes the skill of information literacy as defined in section 589E(f)(3) of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (Public Law 116– 283), as amended by Public Law 117-81).”
- Brief context: Ensures youth and adults in Title I programs and adult learners in Title II programs gain information literacy skills as part of digital literacy skills to ensure workers are prepared for accelerating advances in technology.

[p. 13, Line Number: 23, Draft Section 102(a)(76)(B)(i), WIOA Section 3]

- Feedback #6: After “findings” insert “, including those derived from qualitative research,”
- Context: The inclusion of qualitative research in the definition of “evidence-based” is important in order to ensure that the outcomes of all high-quality research, not only those from quantitative studies, are represented.

[p. 14, Line Number 6 through p. 15, Line Number 5, Draft Section 102, WIOA Section 3]

- Feedback #7: Ensure use of the term “has foundational skill needs” throughout WIOA wherever needed to replace “is basic skills deficient.” See WIOA Sec. 129(a)(1); Sec. 134(b)(3)(E); Sec. 144(a)(3); Sec. 171(e)(1)(B)(i); Sec. 203(4)(C).
- Brief context: Ensures consistency in the use of updated terminology.

[p. 15, Line Numbers 11-15, Draft Section 102, WIOA Section 3]

- Feedback #8: Between “(20 U.S.C. 7801)” and the period, insert “and is equivalent to “secondary school diploma”.”
- Brief context: Alignment of definitions among federal education laws is the foundation for ensuring that those laws operate effectively in tandem. The change from “secondary school diploma” to “regular high school diploma” accomplishes this goal for WIOA and ESEA (ESSA),

but could create dissonance with Perkins V (P.L. 115-224) and the Higher Education Act (P.L. 89-239), particularly in the context of the definition of “career pathway.” The definition in Perkins V at Section 3 [23 U.S.C. 2302] (8) references the definition in WIOA [29 U.S.C. 3102], and the definition in Perkins V (Sec. 484 [20 U.S.C. 1091](d)(2)(F)) uses the term “secondary school diploma or its recognized equivalent.” The definition of “career pathway” allows for co-enrollment and co-investment in this important option for opportunity youth and adults, so the change here needs to make clear that the meaning of “regular high school diploma” and “secondary school diploma” is consistent across legislative contexts.

[p. 17, Line Number 1, Draft Section 111, WIOA Section 101(b)(1)(C)(ii)(III)]

- Feedback #9: After “including” insert “organizations that provide adult education and family literacy services and”.
- Brief context: Ensures greater coordination and collaboration between Titles I and II by including adult education providers on state workforce development boards as well as on local workforce development boards (see Sec. 107(b)(2)(C)(i)).

[p. 22, Line Number 22, Draft Section 112, WIOA Section 102(b)(2)(D)(ii)]

- Feedback #10: In subparagraph (II)(dd), insert “including how costs for such activities will be shared among relevant core programs” after “integrated education and training”.
- Brief context: Requires states to specify how costs for integrated education and training will be coordinated between Title I and Title II to address the concern that too much of the current burden is on Title II, which receives significantly less funding than Title I.

[p. 22, Line Number 23, Draft Section 112, WIOA Section 102(b)(2)(D)(ii)]

- Feedback #11: In subparagraph ii, after (ii)(V), insert the following: “(VI) how the eligible agency will promote, through funding priority or other means, professionalization of adult education and literacy activities through the adoption of staffing models that include (aa) requirements and support for teacher credentialing; (bb) standards, (cc) support for ongoing in-service professional development, and (dd) career ladders for professional growth, which may include more opportunities for full-time teaching positions;”.
- Brief context: Promotes the professionalization of adult educators and the adult education field.

[p. 22, Line Number 23, Draft Section 112, WIOA Section 102(b)(2)(E)(iii)]

- Feedback #12: In subparagraph E(iii)(II), insert “providers of adult education and literacy activities,” after “institutions of higher education,”.
- Brief context: Includes providers of adult education as among those from whom the state should seek input on developing the unified plan.

[p. 40, Line Number 16, Draft Section 116, WIOA Section 107(b)(4)(A)]

- Feedback #13: After “(v)” insert new (v) and renumber accordingly: “(v) A standing committee to provide information and assist with planning, operational, and other issues

relating to improving coordination between workforce development and adult education in order to address workforce development challenges for individuals with foundational skill needs, which shall include at least one entity administering adult education funding under Title II of this Act, at least one provider of adult education and literacy activities, and at least one individual enrolled in an a program of integrated education and training.”

- Brief context: Adds a standing committee focused on improving coordination in the workforce system to address the silos that exist between Titles I and II and improve continuity of access and support for individuals with foundational skill needs.

[p. 41, Line Numbers 4, 10, and 11, Draft Section 116, WIOA Section 107(b)(4)(A)]

- Feedback #14: On line 4, strike “and”; on line 10, strike “.”; on line 11, insert “(IV) at least one representatives of entities administering adult education funded under Title II of this Act.”
- Brief context: Includes input from the adult education community on this standing committee to support planning, operational, and other issues related to engagement of educational entities in the local area.

[p. 43, Line Number: 1, Draft Section 116, WIOA Section 107(d)(5)]

- Feedback #15: After “(5)”, by striking “secondary and postsecondary education” and inserting “secondary, postsecondary, and adult education”.
- Brief context: Requires representatives of adult education to join the board and representatives of secondary and postsecondary education in leading efforts in the local area to develop and implement career pathways for all adults.

[p. 44, Line Number 15, Draft Section 116, WIOA Section 107(d)]

- Feedback #16: Before “(3)” by inserting at end of subsection (d), “(14) COLLEGE AND CAREER NAVIGATORS.— The local board, in collaboration with providers of workforce development and adult education and literacy activities in the local area, shall promote the employment of college and career navigators or other professionals with experience and expertise in providing college and career preparation activities by the one-stop centers and eligible providers (as defined in section 203) in the local area, to provide the services described in section 134(c)(2).”.
- Brief context: Adds promoting the employment of college and career navigators or those with similar experience and expertise to deliver 134(c)(2) career services as a function of local boards.

[p. 48, Line Number 5, Draft Section 117]

- Feedback #17: Change “co-enrollment” to “concurrent enrollment.”
- Brief context: See Feedback #3 above.

[p. 49, Line Numbers 5-6 etc., Draft Section 119(a)(1)(ii)(A)(I), WIOA Section 116(b)(2)(A)(ii)(1) et al.]

- Feedback #18: Delete “(related to the training or services received)” here and in all subsequent measure descriptors in Draft Section 119(a).
- Brief context: This parenthetical is unworkable in terms of showing that a given category of unsubsidized employment is “related” to specific types of training or services. What data points would a Title I or Title II program collect in order to demonstrate a connection that could be considered “related”? In addition, a key objective of training and services provided through titles I and II is to develop worker resilience, including the ability to connect and transfer skills from one context or situation to another.

[p. 50, Line Numbers 14-15, Draft Section 119(a)(1)((ii)(VI)], WIOA Section 116(b)(2)(A)(i)(V)

- Feedback #19: Strike “enrolled in the program for at least 2 quarters”.
- Brief context: Education and training programs are designed to measure interim progress toward recognized postsecondary credentials at credential-appropriate times; for example, demonstrating training milestones at 6 and 12 weeks, or passing a high school equivalency subtest after 4 weeks of preparation. A timeframe of 6 months (2 quarters) does not align with the milestone timelines typical of WIOA programs that are designed to measure, document, and report skills development.

[p. 52, Line Number 14, Draft Section 119(a)(1)(iv)(I), WIOA Section 116(b)(2)(A)(iii)]

- Feedback #20: Strike WIOA subparagraph iiiii entirely and insert “(iii) INTERIM INDICATORS FOR ADULT EDUCATION.—A State may develop interim indicators for measuring the percentage of program participants on track to meet the indicators described in subclauses (IV) and (V) of clause (i) for adult education and literacy activities authorized under title II.”
- Brief context: Strikes the provision specifying that program participants can only be counted as meeting the performance indicators if they have obtained a secondary school diploma or its recognized equivalent and have obtained or retained employment or are in an education or training program leading to a recognized postsecondary credential within 1 year of exit from the program. Replaces it with a provision that allows states to develop interim indicators that measure program and participant successes more accurately and appropriately.

[p. 101, Line Number 19, Draft Section 122(a)(2)(E) as revised]

- Feedback #21: After “occupational skills training” insert “or integrated education and training programs”.
- Brief context: Adds eligibility for adult education providers who are providing activities in combination with integrated education and training (IETs).

[p. 186, Line Numbers 15-16, Draft Section 143(a)(4)(D)(ii)(IV)(aa), WIOA Section 134(a)]

- Feedback #22: On line 15 strike “or”; on line 16 insert, “or those with foundational skill needs” after “adults”.
- Brief context: Adds priority for partnerships that demonstrate the ability to serve those with foundational skill needs.

[p. 201, Line Number 2, Draft Section 143(b)(2)(B), WIOA Section 134(c)]

- Feedback #23: After “services”, insert “, such as by a college and career navigator or other professional with similar experience and expertise,”.
- Brief context: Emphasizes the importance of utilizing college and career navigators or others with experience and expertise in providing college and career preparation activities, to ensure that these services are provided by those who have the necessary skills and training.

[p. 204, Line Number 19, Draft Section 143(b), WIOA Section 134(c)]

- Feedback #24: Insert “digital literacy” after “(including literacy,”.
- Brief context: Ensures that initial skills assessment will include digital literacy.

[p. 207, Line Number: 3, Draft Section 143, WIOA Section 134(c)]

- Feedback #25: After “(II)”, insert “in subclause (xii)(VI) by inserting “digital skills” after “learning skills,”.
- Brief context: Ensures that career services will include digital skills training.

[p. 211, Line Number 6, Draft Section 143]

Feedback #26: Change “co-enrollment” to “concurrent enrollment.”

Brief context: See Feedback #3 above.

[p. 212, Line Number 15, Draft Section 143, WIOA Section 134(c)(3)(D)]

- Feedback #27: After “(B)”, strike “in clause (xi)” and insert “by redesignating clause (xi) as (xii)”; insert “(xi) digital skills training;” and “in redesignated clause (xii)”.
- Brief context: Ensures training services include digital skills training.

[p. 222, Line Number 7, Draft Section 143, WIOA Section 134(d)]

- Feedback #26: Insert “those with foundational skill needs,” after “workers,”
- Brief context: Ensures that one-stop center staff receive professional development on tools and strategies for delivering high-quality services and outcomes for individuals with foundational skill needs.

[p. 281, Line Numbers 12-13, Draft Section 173, WIOA Section 169]

- Feedback #28: On line 12, insert “adult education needs,” after “opportunities”. On line 13, insert “digital literacy and other)” before “skills development”. On line 13 before the period, insert “, including the impact on outcomes for individuals with foundational skill needs”.
- Brief context: Ensures that the new study on the effectiveness and use of emerging technology will include an analysis of digital literacy skill development and the impact on outcomes for individuals with foundational skill needs.

[p. 282, Line Number 14, Draft Section 173, WIOA Section 169]

- Feedback #29: Strike “training programs under this title” and replace with “education and training programs under this Act.”
- Brief context: Ensures the inclusion of participants in title II programs in the new study on the provision and effects of supportive services. These supportive services are critical to successful outcomes for title II participants.

[p. 283, Line Number 12, Draft Section 173, WIOA Section 169]

- Feedback #30: Insert “education and” before “workforce”.
- Brief context: Ensures that adult education programs are included in the new study of alignment between education and workforce development systems, in order to support coordination and collaboration between adult education providers and the workforce system.

[p. 283, Line Number 19, Draft Section 173, WIOA Section 169]

- Feedback #31: After “,” insert “adult education programs, integrated education and training programs,”
- Brief context: Specifies that adult education programs and IETs should be part of State efforts to integrate data to inform decision making and improve educational opportunities and outcomes.

[p. 406, Line Number 5, Draft Section 202(3)(C), WIOA Section 203]

- Feedback #32: After “services” delete the semicolon and insert “, including concurrent enrollment in adult education and postsecondary education;”
- Brief context: Ensures that the definition includes concurrent as well as sequential educational opportunities. Concurrent enrollment is an evidenced-based acceleration strategy that allows adult learners to begin their postsecondary education while also receiving needed foundational skill building, including high school diploma/equivalency programming where appropriate.

[p. 406, Line Numbers 15-18, Draft Section 202(4), WIOA Section 203]

- Feedback #33: Before the “.” insert “and includes the skills of information literacy as defined in section 589E(f)(3) of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (Public Law 116– 283), as amended by Public Law 117-81.”
- Brief context: Ensures that adult learners in title II programs gain information literacy skills as part of digital literacy skills so they are prepared for accelerating advances in technology.

[p. 408, Line Number 1, Draft Section 202, WIOA Section 203]

- Feedback #34: After “(9)”, insert in paragraph (13) (as so redesignated) “(and may be provided concurrently with other activities and services, such as adult basic education)” after “workforce training”.

- Brief context: Clarifies that integrated education and training can be provided alongside other adult education activities and services, with the goal of promoting greater utilization of IETs to help learners more quickly gain needed skills.

[p. 409, Line Number 19, Draft Section 205, WIOA Section 212(a)]

- Feedback #35: After “program” on line 19, insert “, workplace adult education and literacy program, work-based learning program, or workforce preparation program.”
- Brief context: Given the June 24, 2024 update to US ED Program Memorandum 17-2, which makes the relevant Effectiveness in Serving Employers performance accountability measure a consolidated metric across the WIOA core programs, these additional WIOA title II employer-driven program model participants can appropriately be included in the measure.

[p. 409, Line Number 25, Draft Section 205, WIOA Section 212]

- Feedback #36: Before the “.” Insert “(c) PILOT FOR INNOVATIVE PERFORMANCE ACCOUNTABILITY SYSTEMS” and text from page 22, line 14 through page 27, line 2 of [S. 3075](#), the bipartisan Reed-Young Adult Education WORKS Act.
- Brief context: This pilot would allow States to test out systems for assessing performance that use innovative measures and indicators to better capture the full range of skills and credentials that learners attain. Several states have indicated interest in trying out performance measures and indicators that would lead to a more accurate, appropriate, and fair accountability system.

[p. 411, Line Number 7, Draft Section 207, WIOA Section 223 (a)(1)(C)(i)]

- Feedback #37: After “acquisition” insert “digital literacy, and family literacy” (to read “English language acquisition, digital literacy, and family literacy programs”).
- Brief context: Ensures that technical assistance to adult education providers includes the development and dissemination of instructional and programmatic practices in digital literacy and family literacy.

[p. 413, Line Number 3, Draft Section 207, WIOA Section 223(a)(2)]

- Feedback #38: Insert after subparagraph (D) the following: “(E) Developing content and models for family literacy programs.”; and renumber the subsequent subparagraphs accordingly.
- Brief context: Adds a new permissible state leadership activity to encourage the development of content and models for family literacy programs.

[p. 423, Line Number 17, Draft Section 213, WIOA Section 242]

- Feedback #39: Strike the “and” in line 17; in line 19, before the final semicolon, insert “, adults with the greatest foundational skill needs, and adults who are supporting the education of their children”.
- Brief context: Ensures that the identification of effective strategies for working with adults includes those with the greatest skill needs and those who are supporting the education of

their children, recognizing that the literacy levels of parents greatly influences the literacy levels and educational outcomes of their children.

[p. 423, Line Number 20, Draft Section 213, WIOA Section 242(c)(2)(C)(iii)]

- Feedback #40: Strike “with the lowest literacy levels” and insert “with the greatest foundational skill needs”
- Brief context: See feedback #1 above.

[p. 423, Line Number 20, Draft Section 213, WIOA Section 242(c)(2)(C)(vii)]

- Feedback #41: In subparagraph III, insert “, including digital literacy skills development;” after “activities”
- Brief context: Ensures that digital literacy skills are included in the development, replication, and dissemination of best practices and innovative programs.

[p. 424, Line Number 5, Draft Section 213, WIOA Section 242(c)(2)(D)(ii)]

- Feedback #42: In subparagraph (D)(ii), insert “for themselves and their children” after “education and training”.
- Brief context: Ensures that the independent evaluation of adult education and literacy activities considers the positive impact such activities have on future generations.

[p. 426, Line Number 3, Draft Section 214, WIOA Section 243]

- Feedback #43: Before line 3, insert “Section 243 of the Adult Education and Family Literacy Act (29 U.S.C. 3333) is amended in subsection (a), by striking “, in combination with integrated education and training activities”; *and*

[p. 426, Line Numbers 8-25, Draft Section 214, WIOA Section 243]

- Feedback #44: Strike subparagraphs (1) through (5) completely. Insert after “designed to” the following: “prepare adults who are English learners for full participation in the economic, educational, and civic life of the community, which may include integration with the local workforce development system.”
- Brief context for both: IELCE funds are small, and grantees use them in combination with other funds to design and implement comprehensive programs. This change addresses the need for flexibility in designating funds for services that leverage partnership for the greatest impact.