May 29, 2014

Ms. Alicia Bolton  
U.S. Department of Education  
Washington, DC 20202

RE: Request for Information on Adoption of Career Pathways Approaches for the Delivery of Education, Training, Employment, and Human Services

Dear Ms. Bolton,

On behalf of National Skills Coalition – a broad-based coalition of business leaders, union affiliates, education and training providers, community-based organizations, and public workforce agencies advocating for policies that invest in the skills of U.S. workers – thank you for inviting the public to provide information on career pathways. National Skills Coalition shares the agencies’ interest in improving alignment of adult basic education (ABE) and English language acquisition (ESL), occupation training, postsecondary education, and supportive services at the federal level to better support career pathways programs, and appreciates the opportunity to weigh in on this issue.

To get a job, keep a job, or secure a better job, workers at all levels of today’s labor market will need to upgrade their skills throughout their lifetime. Over the next decade, two-thirds of all job openings will require some postsecondary education or training. At current production rates, by 2020, the U.S. will encounter a shortfall of 5 million workers with postsecondary credentials.\(^i\) To maintain our global economic competitiveness, the U.S. must ensure that employers have access to the skilled workforce they need to grow their businesses.

Despite growing employer demand, the supply of skilled workers is low, due in part to tremendous unmet need for education and training services. A recent report by the Organization for Economic Cooperation and Development (OECD) found that 36 million – or one in six – U.S. adults have low basic skills. The same report found that three million low-skill adults who are not enrolled in adult education programs would like to enroll, and six million low-skill adults who have participated in adult education would like to participate more.

Meeting the increasing skill needs of both employers and workers will require expanded access to innovative education and training programs that prepare workers for available jobs. Career pathways offer a policy solution by creating clear and manageable pathways to postsecondary and career success.
Elements of a Career Pathways Program

Career pathways – which align ABE, ESL, job training, higher education, and basic support systems to create pathways to postsecondary educational credentials and employment – have emerged as a best practice for building the skills of workers while they continue to work and support their families. Career pathways should allow individuals to move seamlessly across both programs and institutions, and to continuously improve their employment and earnings potential. Career pathways are meant to serve workers at all skill levels – from low-skill workers to middle-skill workers and beyond – preparing them for employment or advancement in a locally or regionally in-demand industries.

To meet the needs of all workers, career pathways should be designed to meet the basic education needs of workers in addition to their occupational skills needs, provide wrap-around supportive services to ensure individuals succeed in education and training programs, and offer flexibility for workers to move on and off of the pathway as necessary. Career pathways should be “chunked” and accelerated into easily manageable components, and each step should be designed to lead to the attainment of a stackable and portable credential that is clearly linked and articulated to the next step along that career pathway. Finally, career pathways should be linked to sector partnerships to ensure that the pathway is preparing workers for jobs in locally or regionally in-demand occupations and industries.

Career pathways should integrate or contextualize ABE, ESL, and occupational skills

There is a growing understanding in the field of the need for integrated ABE and ESL as part of a career pathway, recognizing that limited literacy or English proficiency along with low basic skills prevents adults from securing quality employment. Research has shown that accelerator programs such as the Washington State I-BEST (Integrated Basic Education and Skills Training) program – which combine adult basic education and occupational skills training – can improve outcomes for adult learners. This is particularly true when the programs offer college level credits to students enrolled. Individuals who participate in accelerator programs more rapidly obtain college credits, a credential, or make basic skills gains. Other effective program models include bridge programs (programs that prepare adults with limited academic or limited English skills to enter and succeed in credit-bearing postsecondary education and training); Vocational ESL (VESL) programs; and dual enrollment programs (in which students enroll in postsecondary instruction and receive both postsecondary and secondary credit). Each of these strategies can serve as an element of a career pathway, although they do not constitute a fully articulated pathway on their own.

Bridge programs and other integrated or contextualized learning models within career pathways can help boost participation, by allowing adults to bypass remediation and reducing the amount of time spent enrolled in education. Offering credit for prior learning can help accelerate movement along a career pathway as well, though creating opportunities for students to obtain credit for prior learning can be a challenge, as institutions and accreditors have been hesitant about how to assign credit for prior learning.
Career pathways should be coordinated across a range of key stakeholders

Career pathways involve a range of stakeholders on the ground, and therefore require significant coordination across agencies and funding streams. Possible partners include training providers, workforce investment boards (WIBs), community colleges, community-based organizations (CBOs), support services providers, employers, and state and local agencies. Coordination can look quite different depending on how the state systems are structured, what entities are on the ground, and which agencies are responsible for each funding stream. Articulation agreements help facilitate coordination between institutions, though they too vary in structure from state to state. For instance, more centralized state systems may produce statewide articulation agreements, while local control areas may go institution by institution. Facilitated peer-to-peer sharing between states can help states and local areas develop these agreements.

Career pathways should link to sector partnerships

Career pathways programs should also take advantage of existing capacity in the state, such as sector partnerships. Sector partnerships – which bring together employers and other stakeholders connected to local or regional industries to address skills shortages and develop workforce pipelines – can be a tool to engage employers in a well-defined career pathways program. Career pathways should be demand-driven, and should prepare workers for jobs that are available in their local or regional area. Career pathways should always – when feasible – be linked to sector partnerships, to ensure that the pathway is designed with local employer needs in mind. These partnerships can also be used to help identify labor market need, establish formal or industry skill standards, aid in curriculum design, or establish industry certifications.

Career pathways should offer wraparound support services

In addition to core services, well-designed career pathways offer wraparound supportive services to help ease transitions across programs. Low-skill adults entering a career pathway may experience numerous barriers to success along a pathway and often require additional services to persist, such as transportation and child care. Navigators, professionals who work closely with participants as they move through a career pathway, play an important role in connecting participants with the right services. States have recognized the impact of navigators on participant persistence, and have in some instances, begun dedicating funding to employ navigators. In 2013, for instance, Iowa dedicated $10.5 million to ABE and workforce training, a portion of which went to employing pathway navigators at community colleges.

Career pathways should offer financial aid that meets the needs of low-income adults

Navigators may also connect participants with the resources needed to finance their education. Nontraditional students often face several barriers to accessing financial aid. Working students are penalized for even very small earnings, and students seeking occupational skills through non-credit courses (more than 5 million community college students) and/or who are attending school less-than-half-time because they are balancing the demands of family, work, and school
are often ineligible for financial aid. Financial resources have become more difficult to access in recent years, as a result of federal and state funding cuts, coupled with programmatic changes (including changes to Pell eligibility).

For example, previously the Ability-to-Benefit (AtB) provision of the Higher Education Act allowed newly enrolled students who demonstrated college readiness but who did not have a high school diploma or its equivalent to access federal financial aid. The 2012 elimination of the AtB provision dealt a significant blow to community college career pathways efforts in particular, by limiting access to financial aid and by extension eliminating access to career pathways for thousands of low-skilled adults. Similarly, the elimination of year-round Pell and reduction in the number of semesters a student is eligible for Pell disproportionately impacted low-skilled adults who may take more time to complete their education or progress along a pathway. Recent proposals to eliminate Pell for less-than-half-time students also threaten to reduce access to career pathways.

Integrated learning models within career pathways that allow adults to bypass remediation, as well as credit for prior learning can help offset the costs of career pathway programs for participants, though they do not make up for decreasing investments in education and training and shrinking availability of financial aid.

**Recommendations for Strengthening Career Pathways**

Career pathways have emerged as a promising strategy for helping low-skill adults achieve career and postsecondary success. That success has come, in some instances, not because of federal policy but in spite of it. At the federal level, there is a need for better support of career pathways, as well as for alignment across agencies to help facilitate coordination between programs on the ground. In the recommendations below, we propose several strategies to improve federal support for career pathways systems.

*Target federal investment toward programs aimed at strengthening career pathway models through education and training programs that integrate basic literacy and numeracy skills with occupational education or training.*

Perhaps the most significant obstacle to success of career pathways models is a lack of alignment between postsecondary education and training. Though integrated models have shown to be most effective, co-enrollment across Workforce Investment Act (WIA) Titles I and II is exceptionally low (just 0.1 percent of program year [PY] 2012 WIA Adult exiters were co-enrolled in adult education programs), suggesting that many individuals seeking adult education are not taking advantage of the range of employment and supportive services – including child care and transportation assistance – that are available under Title I. This also suggests that adults are enrolling in programs that may not be adequately aligned with entrance requirements for occupational training and postsecondary program models. Difficulties integrating funding streams mean that providers offering integrated education and training programs must maintain and track separate funding streams to support different components.
of the same program. American Job Center (AJC) operational costs count against the 5 percent cap for administrative expenses under WIA Title II, which may create disincentives for state and local adult education agencies to pursue integrated programming.

Federal investments should be supportive of and targeted to integrated learning models. A portion of federally funded WIA Title II state grants should be used for seeding and scaling these types of programs, and waivers should be made available to states that make it easier to integrate WIA Title II with Title I as well as other federally funded postsecondary education and training programs. Discretionary grants to states to support systemic efforts to scale integrated basic skill/workforce and postsecondary education should also be made available.

**Significantly increase federal investments in ABE, ESL, and contextualized occupational training.**

Despite tremendous unmet need for services in the U.S, adjusted for inflation, federal support for the programs that help adults build their basic literacy and numeracy skills has declined by nearly 24 percent since 2003 and the number of individuals served has declined by one million people (30 percent) since 2000.

*Mandate that each of the three required local activities funded by WIA Title II—adult education and literacy services (including workplace literacy services), family literacy services, and English literacy services—increase the rate at which students attain career and postsecondary success.*

The Office of Career, Technical, and Adult Education (OCTAE; formerly OVAE) has recently made progress on this issue by beginning to measure core outcomes (educational gains, entered employment, retained employment, receipt of secondary school diploma or GED, and entered postsecondary education or training) for all WIA Title II participants instead of tracking outcomes only for students who report a goal related to the measure. The next step OCTAE should take is to ensure that federal adult education accountability is focused on objective, measurable, evidence-based indicators of student progress toward credentials of value in the labor market and success in the labor market. Finally, outcomes under Title II should measure postsecondary success (rather than enrollment), such as completing the equivalent of one semester of occupational training or college-level math or English, or earning a credential of demonstrated value in the labor market.

*Remove disincentives to serve low-skilled individuals by adjusting and aligning accountability across programs.*

Under WIA, common measures should be improved by using regression models to account for hard-to-serve individuals, and adopting interim outcome measures that signal basic skills gains or progress toward long-term employment or educational outcomes. Regression models will address “creaming” issues related to disincentives for providers to serve very low-skill individuals. In addition, because low-skilled adults often require a range of services, agencies should be permitted to report a single set of outcomes for individuals co-enrolled in WIA Title I
training, Title II adult basic education, or TANF and require states and local areas to establish and meet annual co-enrollment goals to ensure eligible participants have access to needed services.

**Ensure low-skilled adults have access to financial aid.**

Congressional action eliminating the AtB provision and narrowing Pell eligibility has had the effect of limiting low-skilled adults’ access to federal financial aid and by extension, their access to educational and career opportunities. The Department of Education should in its fiscal year (FY) 2016 budget proposal, ask Congress to restore the AtB provision, restore year-round Pell, and increase the number of semesters students are eligible for Pell (back to 18 semesters from the current limit of 12 semesters).

**Clarify to states that individuals can receive WIA-funded services for longer than one year.**

Although there is nothing under law that limits how long individuals can receive WIA-funded services, there is a widely held incorrect belief that there is a one-year time limit. The Department of Labor (DOL) should issue guidance to the states clarifying this issue and affirmatively encouraging AJCs to provide long-term services and supports for low-skilled individuals, particularly in the context of clearly articulated career pathways.

**Signal that American Job Centers should seek to serve individuals at all skill levels.**

While some AJCs have done a good job serving low-income adults—including those with limited basic skills—the performance overall across the system could be better (WIASRD data has shown a decline in the number of low-income people being served in recent years).viii DOL should issue guidance that encourages AJCs to reaffirm their commitment to these clients—for example, by adopting the new career pathways models that DOL has begun to promote—and to reassure local systems that they will not be penalized for enrolling harder-to-serve clients.

**Offer technical assistance to states on program alignment.**

The Departments of Labor and Education should offer technical assistance to states to help facilitate partnerships between agencies and other stakeholders involved in career pathways at the state and local level. Technical assistance should cover articulation agreements, braiding funding streams, and developing partnerships across agencies to facilitate career pathways.

**Ensure that federal place-based, community, and economic development initiatives, particularly in areas with high density of adults with low basic skills or English proficiency, integrate adult basic education and workforce training.**

Too often, the skills of the local workforce are an afterthought in community and economic development initiatives as well as place-based initiatives. Because of this, the impact of these initiatives is constrained when local residents don’t have the basic skills to enter the jobs that are being created or to enter the necessary training to prepare for the jobs. This can be particularly challenging because many of the cities and neighborhoods that these initiatives
target have a disproportionately high number of individuals with low basic skills. To ensure that basic skills education is aligned with federal place-based initiatives, create “Skill-Up Zones” in areas receiving basic skill emergency grants that would align with other federal place-based efforts such as Promise Zones, Choice Neighborhoods, etc. Cities should be rewarded for demonstrating meaningful coordination of adult basic education, workforce development and community/economic development activities with a focus on low-income populations. The departments of Education, Labor, Housing and Urban Development, Commerce, and Health and Human Services should also develop coordinated waivers that reward efforts to integrate employment focused basic skills education and community and economic development efforts by making it easier to braid funding streams and serve the hardest to employ.

Ensure special populations are served by career pathways

Lastly, a number of cities have experienced rapid population loss which has led to a decrease in formula resources, yet the residents who remain are often those with the lowest basic skills. Thus, while the number of individuals has gone down, the intensity of demand has gone up. Special populations in these cities, including immigrant workers and youth have significant need, but often lack connections the public workforce system. Funding should be targeted at states and local areas that partner with organizations that have demonstrated ability to connect and provide services these populations.

Thank you for the opportunity to comment on the development of high-quality career pathways programs. If you have any questions, please feel free to contact Angela Hanks, Senior Federal Policy Analyst (angelah@nationalskillscorlition.org or 202-223-8991, ext. 103).

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iii http://www.seattlejobsinitiative.com/jobseekers/career-pathways-program/.
vii National Skills Coalition calculation based on U.S. Department of Education data.