



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF VOCATIONAL AND ADULT EDUCATION

JUN 8 - 2010

PROGRAM MEMORANDUM FY 2010-02

To: State Directors of Adult Education

From: Brenda Dann-Messier
Assistant Secretary for
Vocational and Adult Education

Subject: Use of Funds Provided Under the *Adult Education
And Family Literacy Act (AEFLA)* for Integrated Education and Training (IET)

Career pathways models are gaining widespread recognition from State adult education offices, national organizations, employers, and others using adult education services to prepare adults for success in postsecondary education and work. Career pathways models connect education and training with support services to enable individuals to secure employment in particular industry or occupation sectors and to advance to successively higher levels of education and employment in those sectors. These pathways lead to industry-recognized credentials. One method of designing career pathways is by using IET models. These models may be funded by a single source or by combining multiple funding sources to achieve service integration. This memorandum provides guidance on how funding under AEFLA (20 U.S.C. 9201 *et seq.*), enacted as Title II of the *Workforce Investment Act* (WIA), may be used to support IET models in combination with other funding sources. This guidance provides the U.S. Department of Education's interpretation of various statutory provisions and does not impose any requirements beyond those included in AEFLA and other applicable laws and regulations. In addition, it does not create or confer any rights for or on any person.

1. What is IET?

IET combines occupational skills training with adult education services to increase the educational and career advancement of participants. In programs that deliver IET, adults participate in both occupational skills training and adult education services at the same time. This approach is often referred to as concurrent enrollment, co-enrollment, or dual enrollment. This memorandum uses the terms "co-enrollment" and "co-enrolled" when referencing this approach.

2. What is adult education, and what are adult education and literacy activities?

AEFLA defines certain terms in section 203 (20 U.S.C. 9202). "Adult education" is defined as services or instruction below the postsecondary level for individuals defined as eligible under the law (i.e., individuals who satisfy the criteria in section 203(1)(A) through (C) of AEFLA). "Adult education and literacy activities" is defined as: (1) adult education and literacy services, including workplace literacy; (2) family literacy services; and (3) English literacy programs. "Workplace literacy" is defined as literacy services offered for the purpose of improving the

productivity of the workforce through the improvement of literacy skills. “Literacy” is defined as an individual’s ability to read, write, and speak in English, to compute, and to solve problems at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

3. What provisions of AEFLA support the advancement of individuals into postsecondary education and work?

AEFLA supports, through multiple references in its provisions, the advancement of individuals into postsecondary education and into further education and training and employment. These provisions include the following:

- *Purpose*—Describes, as a purpose of the program, creation of a partnership to “assist adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency.” (20 U.S.C. 9201)
- *Performance accountability system*—Identifies, as a core indicator of performance, the “[p]lacement in, retention in, or completion of, postsecondary education, training, unsubsidized employment or career advancement.” (20 U.S.C. 9212(b)(2)(A)(ii))
- *State leadership activities*—Permits State leadership funds to be used for adult education and literacy activities, including for the “[i]ntegration of literacy instruction and occupational skill training, and promoting linkages with employers” and for “[l]inkages with postsecondary educational institutions.” (20 U.S.C. 9223(a)(10)-(11))
- *State plan*—Requires that State plans include “a description of how the adult education and literacy activities that will be carried out with any funds received under this part will be integrated with other adult education, career development, and employment and training activities in the State or outlying area served by the eligible agency.” (20 U.S.C. 9224(b)(11))
- *Grants and contracts for eligible providers*—Requires States to consider in awarding grants or contracts to eligible providers both “whether the activities provide learning in real life contexts to ensure that an individual has the skills needed to compete in the workplace and exercise the rights and responsibilities of citizenship” and “whether the activities coordinate with other available resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, one-stop centers, job training programs, and social service agencies.” (20 U.S.C. 9241(e)(7), (9))

4. What does AEFLA say about IET?

Although AEFLA does not specifically use the term “integrated education and training,” the statute permits the use of Federal funds for the adult education component of an IET program. Section 223(a)(10) of AEFLA (20 U.S.C. 9223(a)(10)) does refer to the “integration of literacy instruction and occupational skill training” as one allowable use of State leadership funds, highlighting the availability of those Federal funds for a similar purpose.

5. How may AEFLA funds be used to support IET programs?

AEFLA funds may be used to support the portion of an IET program that provides instruction in reading, writing, mathematics, or English proficiency that is *below* the postsecondary level. This instruction in basic literacy skills and the English language should be contextualized to support the occupational skills portion of the program. Curriculum for an IET program should adequately address both the basic literacy skills and the occupational competencies needed for the participant to complete the program successfully. AEFLA funds may be used to plan, develop, and deliver the portions of the curriculum that address basic literacy skills. To the extent that an IET program includes occupational training, AEFLA funds may not be used for that portion of the program. Therefore, the eligible entity must use other funds to support that portion of the IET program.

6. How may AEFLA State leadership funds be used to support IET programs?

Section 223(a)(8) of AEFLA (20 U.S.C. 9223(a)(8)) allows State leadership funds to be used to conduct activities of statewide significance that promote the purpose of AEFLA. For example, a State may choose to use State leadership funds to provide the basic literacy skills components of pilot or demonstration IET programs and to develop portions of the curriculum pertaining to basic literacy skills. State leadership funds also may be used to provide teacher training relating to basic literacy skills, which is an important component of program success. The State may also elect to use State leadership funds to provide incentive funding to programs that successfully coordinate training services in IET models. These funds also may be used to engage employers in high-demand sectors in the development and implementation of IET models in the State. 20 U.S.C. 9223(a)(10).

7. How may funds under Title I of WIA be used to support IET?

Title I of WIA allows funds to be provided for adults and dislocated workers who meet WIA Title I eligibility requirements for occupational skills training, on-the-job training, programs that combine workplace training with related instruction, skills upgrading and retraining, entrepreneurial training, job-readiness training, and other training described in section 134(d)(4)(D) of WIA (29 U.S.C. 2864(d)(4)(D)). Title I of WIA also allows for adult education and literacy activities to be provided in combination with many of these training services. See section 134(d)(4)(D)(i)-(vii) of WIA (29 U.S.C. 2864(d)(4)(D)(i)-(vii)). Students receiving adult education services under AEFLA (WIA Title II), as well as training services under WIA Title I, should be co-enrolled in both programs.

8. May AEFLA participants be co-enrolled in postsecondary occupational training?

Yes. There is no prohibition in AEFLA against enrolling an individual who is participating in an adult education program funded under AEFLA in occupational training for which postsecondary credit may be earned. No statutory prohibition in AEFLA prevents a participant in a program funded by AEFLA from co-enrolling in such training at any level. AEFLA does, however, prohibit enrolling students in AEFLA-supported adult education if those students are still enrolled or required to be enrolled in secondary school (see section 9202(1)(B) of AEFLA).

9. Who is eligible for co-enrollment in IET programs funded in part by AEFLA funds?

Any individual who meets the eligibility requirements of AEFLA may be co-enrolled in an IET program. IET costs that may be charged to AEFLA include the costs for adult education and literacy activities below the postsecondary level for AEFLA-eligible individuals. To be eligible, these individuals must:

- (i) be 16 years of age or older;
- (ii) not be enrolled or required to be enrolled in secondary school under State law; and
- (iii) lack sufficient mastery of basic educational skills to enable them to function effectively in society; lack a secondary school diploma or its recognized equivalent and have not achieved an equivalent level of education; or be unable to speak, read, or write the English language. See 20 U.S.C. 9202(1).

10. What audit considerations must be taken into account when implementing IET models?

A State is responsible for establishing and implementing adequate internal controls to ensure that AEFLA funds expended in IET programs are used only to support the portion of the program that provides adult education activities allowable under AEFLA. The *Education Department General Administrative Regulations* (EDGAR) at 34 CFR part 80 contain rules governing post-award requirements and financial administration of grant funds. The basic rule for non-Federal audits related to AEFLA grants may be found in EDGAR at 34 CFR 80.26.

11. What are the Federal National Reporting System (NRS) reporting requirements for students enrolled in IET programs?

States are responsible for reporting in the NRS all students who receive at least twelve hours of adult education services, including students who are enrolled in IET programs, if they are receiving any services funded by AEFLA. States must report on the educational functioning levels of these IET program participants based on approved NRS tests and in ways consistent with the State's assessment policy, in addition to other reporting requirements. Additional information regarding the NRS implementation guidelines is available on the NRS Web site at www.nrsweb.org/foundations.

12. How should NRS goals be set for participants in IET programs?

Each student entering an IET program should undergo a high-quality intake and assessment process that provides an opportunity for the student and programs to set realistic NRS goals for the student, including completion of secondary education, transition to postsecondary education, and attainment or retention of employment. If an IET program offers enrollment in postsecondary education or training at program entry, that program should not set the goal of entrance into postsecondary education as an outcome of program exit. Programs should set the goal of entrance into postsecondary education only for program participants who are not enrolled

in postsecondary occupational training (for example, certain Certified Nursing Assistant or Food Service Worker programs). Programs should set goals related to employment since students enrolled in IET programs presumably have goals to obtain jobs in their areas of study. If a student does not have a high school diploma at entry, it may be appropriate to set a goal of high school completion.