



### ABOUT THIS SERIES

The stated purpose of the federal Workforce Innovation and Opportunity Act (WIOA) is “to strengthen the United States workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs in the United States, and to promote individual and national economic growth.” Through this series of briefs on key equity levers in WIOA, World Education, Inc. (WEI) provides analysis of WIOA quantitative data 2016-2019 and recommendations for WIOA reauthorization on five key topics:

- **CO-ENROLLMENT**
- **CO-INVESTMENT**
- **CAREER PATHWAYS**
- **PERFORMANCE ACCOUNTABILITY**
- **SYSTEM INTEGRATION**

The goal of the series is to inform policy makers and other key stakeholders on WIOA outcomes to date and present options for increasing the efficacy of the WIOA legislation to promote equity.

# CO-ENROLLMENT

The term 'co-enrollment' as used in this brief refers specifically to simultaneous enrollment in more than one of the Workforce Innovation and Opportunity Act (WIOA) six core programs:

- **Title I** Adult
- **Title II** Adult Education and Family Literacy
- **Title I** Youth
- **Title III** Wagner-Peyser
- **Title I** Dislocated Worker
- **Title IV** Vocational Rehabilitation Services

WIOA does not define co-enrollment, but does require state reporting of participants who received services under more than one core WIOA program. A 2017 joint U.S. Department of Education and Labor webinar<sup>1</sup> discussed the purpose of co-enrollment as a route “to better develop an understanding of which programs are necessary for participant success and advancement toward their career and educational goals,” without describing how co-enrollment would indicate this. In response to a question, webinar presenters provided direction on reporting and performance— noting that a co-enrolled individual’s performance gains are reported in ALL systems in which that individual is enrolled, not divided up based on funds spent or services provided. This webinar transcript remains the only federal guidance to the field to date on how co-enrollment is to be understood and evaluated.

In 2018, in response to state questions on co-enrollment, a federal technical assistance project<sup>2</sup> was conducted to enable a cohort of states to develop individual state plans. One of those states, California, went on to create their state co-enrollment directive<sup>3</sup> that includes public benefit programs in addition to the six WIOA core programs. The California directive provides both a strong definition and clear purpose for co-enrollment to increase program and participant success, maximize resources, enable greater efficiencies in service delivery, and align services with regional sector pathways. The directive also notes the power of co-enrollment: “By braiding resources and realigning program service delivery models, we can redefine participant flow and facilitate access to comprehensive services.”

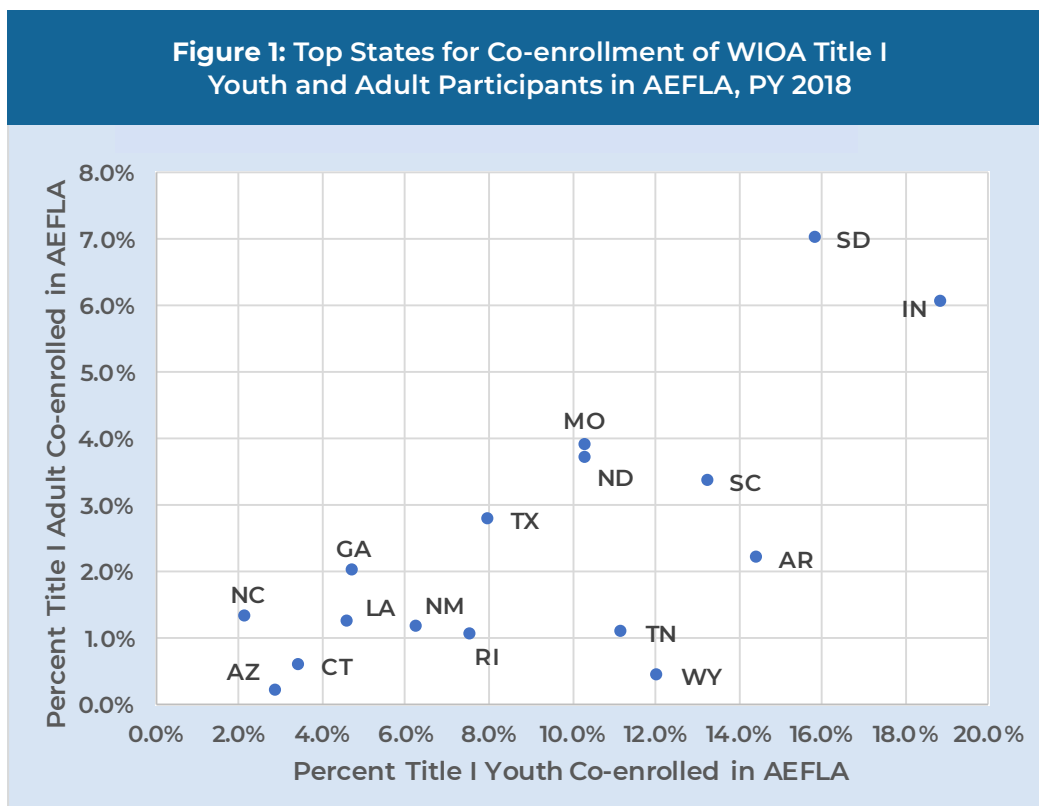
## WIOA QUANTITATIVE REPORTING

WEI’s analysis of co-enrollment focused on the extent to which states are utilizing co-enrollment of WIOA Title II Adult Education and Family Literacy Act (AEFLA) participants with other WIOA core partners to provide holistic, human-centered career and training services, particularly with WIOA Title I out-of-school youth and WIOA Title I Adult participants.

The AEFLA summary data reporting indicates that 5.9 percent of AEFLA participants were enrolled in another WIOA title in PY 2017, and 6.2 percent were in PY 2018. However, this data is greatly underreported, with only 25 of the 57 states and territories reporting any co-enrollments in PY 2017, and only 22 states and territories reporting in PY 2018.

WEI also analyzed summary data on co-enrollments of WIOA Title I Youth and Title I Adults in AEFLA. The data was drawn from the Performance Accountability, Information, and Reporting (PIRL) system, the individual participant records submitted by the states to U.S. Department of Labor on a quarterly basis, which contain variables on the enrollment of participants in all WIOA Titles. This data indicates that only about 3.2 percent of WIOA Title I Youth were co-enrolled in AEFLA nationally, and just 0.6 percent of WIOA Title I Adults were co-enrolled in AEFLA, even though AEFLA participants are a priority-of-service population for the WIOA Title I Adult program. These co-enrollment percentages vary substantially across states, with 11 states co-enrolling more than 6 percent of their

Title I Youth participants in AEFLA, and five states enrolling more than 3 percent of their Title I Adult participant in AEFLA. See **Figure 1**.



Co-enrollment, the leveraging of the education and workforce development partner services to holistically meet the needs of program participants, was to be the hallmark of WIOA career pathways. Why isn't it happening? While Congressional intent embedded equity into the law, subsequent siloed rule-making, lack of guidance, and calcified practices have kept that intent from becoming reality.

Specifically, two WIOA equity strategies remain largely unfulfilled:

### WIOA TITLE I Youth

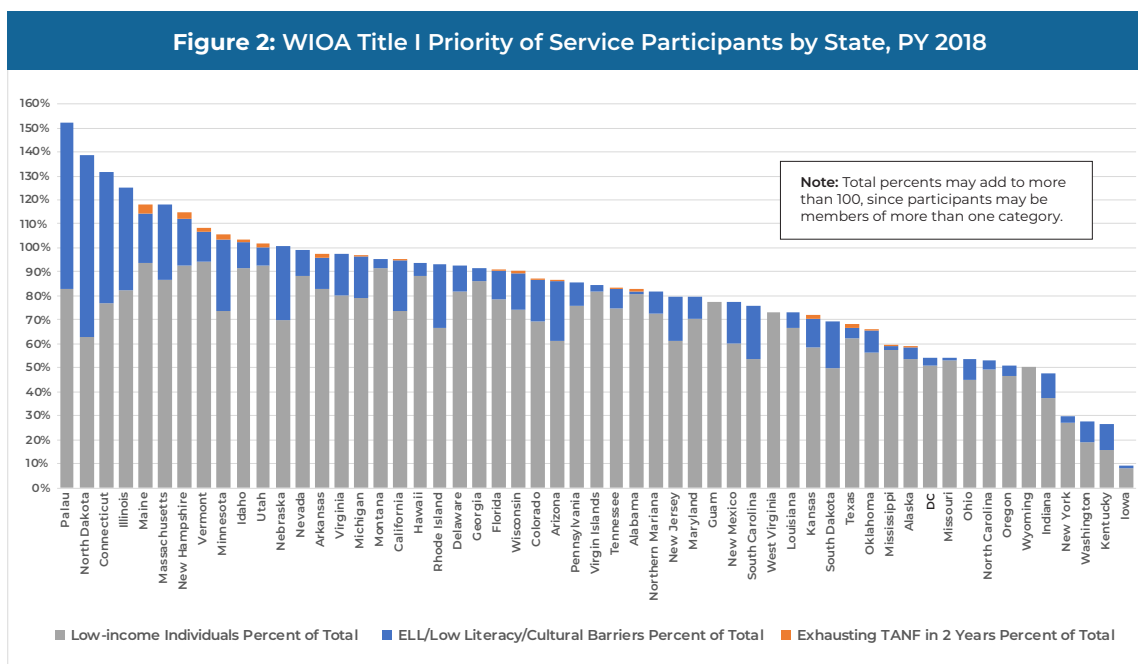
First is the critical requirement to turn the WIOA Title I Youth program toward the out-of-school youth (OSY) population. WIOA requires 75% of WIOA Title I Youth funding to be spent on OSY. However, many WIOA 2020 plans include OSY waiver requests, allowing states to opt out of building partnerships with community organizations and public benefit programs to serve OSY and instead focus on providing career exposure only through K12 partnerships. While a number of exemplar communities are building partnerships to serve more OSY and serve them well, the year-over-year granting of waivers without consequences means that some states are able to disregard the WIOA mandate to address the needs of their least-well-served youth populations.

### WIOA TITLE I Adult

The second largely ignored equity strategy is the WIOA Title I Adult priority-of-service mandate, which focuses funds on three key populations: "recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners)." WIOA closed a loophole in the previous legislation that allowed states to use the "limited funding"

rationale to avoid prioritizing these populations, but the data reveals little effort by states to push beyond “low-income” as a target population. **Figure 2** illustrates this point using data on percentages of low-income individuals, individuals who are English learners or have low literacy, and Temporary Aid to Needy Families (TANF) recipients by state/territory for PY 2018.

Similarly, recent Department of Labor guidance<sup>4</sup> sets an expectation that states will dedicate 75% of WIOA Title I adult funds for priority of service populations, but WIOA 2020 plans<sup>5</sup> reveal little intent to move beyond 51%.



## RECOMMENDATIONS

As the WIOA legislation comes due for reauthorization, policy makers need to amend it to strengthen definitions, close loopholes, and provide joint guidance and incentives in order to ensure that its intended equity outcomes are realized.

**First, provide a definition of co-enrollment** that supports each state’s strategic plan, whether that is a unified plan—the minimum requirement to include the six WIOA core partners—or a combined plan (see box below for a sample definition of strategic co-enrollment). States that have taken up the combined plan option are creating equity strategies with Perkins Career and Technical Education (CTE) partners, community colleges, Temporary Assistance to Needy Families (TANF) partners, Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T) partners, and other entities in the list of “required one-stop partners” in WIOA Section 121(b)(1)(B), and they should be rewarded for developing and implementing these co-enrollment strategies.

**Second, align definitions of the two key WIOA activities:** career services and training services. As it now stands, the joint performance accountability guidance documents from the Departments of Labor<sup>6</sup> and Education<sup>7</sup> describe the same activity—for instance, participation in adult education—in two different ways and limit shared accountability through different interpretations of activities across the titles. This creates unnecessary barriers for states seeking to serve their youth and adults with equity strategies that align with WIOA’s equity mandates.

**Strategic co-enrollment** – Intentional enrollment in more than one WIOA Plan Partner program, as defined in a state’s WIOA Unified or Combined Plan. Shared case management, leveraged resources, and improved participant experiences and outcomes are made possible through the strong partnerships that characterize strategic co-enrollment. Strategic co-enrollment is participant centered and provides all necessary services to achieve positive outcomes. Coordination should prevent duplication or the supplanting of intensive services.

## ADDITIONAL RECOMMENDATIONS FOR WIOA REAUTHORIZATION

### For core partners:

- Eliminate OSY waivers and provide guidance and incentives to help local providers “find” and serve the OSY population in their communities through partnerships with TANF, SNAP E&T, and more.
- Codify 75% for Title I Adult priority of service populations AND set a target percent of funds for training services. Too many local areas use WIOA Title I Adult funds for infrastructure rather than service delivery. A priority-of-service target is needed, but it is useless without a target for percent of funds used for career and training services within the Title I Adult program.
- Produce joint U.S. Departments of Education and Labor guidance clearly detailing how co-enrollment is “counted” in WIOA performance.
- Provide incentive funding for co-enrollment. WIOA ended the incentive funding structure that seeded many of the career pathway innovations that were built into the legislation. A reauthorized WIOA should include an incentive funding structure completely built on providing effective services to those community members who are most in need of public education and workforce development programs.

### For broader partners:

- Provide guidance specifically for serving shared populations such as the expanded Perkins CTE low-income adults and public benefit recipients (e.g., TANF, SNAP E&T).
- Support adult education and postsecondary education dual enrollment through active promotion of the Higher Education Act Ability to Benefit provision.

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<sup>1</sup> WIOA Performance Accountability Hot Topics. Retrieved from <https://www.workforcegps.org/sitecore/content/global/events/2016/12/14/12/38/WIOA-Wednesday-WIOA-Performance-Accountability-Hot-Topics>

<sup>2</sup> WIOA Co-enrollment Lessons Learned. Retrieved from <https://www.workforcegps.org/events/2018/06/21/15/09/WIOA-Co-Enrollment-Cohort-Lessons-Learned>

<sup>3</sup> Strategic Co-enrollment Unified Plan Partners. Retrieved from [https://www.edd.ca.gov/Jobs\\_and\\_Training/pubs/wsd19-09.pdf](https://www.edd.ca.gov/Jobs_and_Training/pubs/wsd19-09.pdf)

<sup>4</sup> Training and Employment Guidance Letter 7-20. Retrieved from [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_7-20.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_7-20.pdf)

<sup>5</sup> WIOA State Plans. Retrieved from <https://wioaplans.ed.gov>.

<sup>6</sup> Training and Employment Guidance Letter 10-16 Change 1. Retrieved from [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_10-16-Change1.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_10-16-Change1.pdf)

<sup>7</sup> Program Memorandum OCTAE 17-2. Retrieved from <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-2.pdf>

# CO-INVESTMENT

The Workforce Innovation and Opportunity Act (WIOA) has fundamental purposes: to create more access and opportunity for educational and economic mobility within target populations, and to support alignment across the workforce, education, and economic development systems to increase the quality and accessibility of education and employment services. The law endorses two complementary strategies, co-enrollment and co-investment, for realizing these purposes. WEI’s brief on co-enrollment presents data and recommendations on this strategy as it pertains to WIOA’s six core programs:

- **Title I** Adult
- **Title I** Youth
- **Title I** Dislocated Worker
- **Title II** Adult Education and Family Literacy
- **Title III** Wagner-Peyser
- **Title IV** Vocational Rehabilitation Services

The co-investment strategy pertains to these programs and more, as it includes all of the “required one-stop partners” listed in WIOA Section 121(b)(1)(B), such as programs authorized under the Perkins Act, the Senior Community Service Program, and Temporary Assistance to Needy Families (TANF). Even more than co-enrollment, co-investment requires a conversation around what it means to partner. Partnership goes far beyond signing an annual Memorandum of Understanding; it means bringing resources and taking responsibility. However, in many states co-investment is an unrealized equity strategy.

## WIOA QUANTITATIVE REPORTING

WIOA’s mandated statewide performance reporting demonstrates the lack of investment being made in quality career and training services. **Figure 1** shows the data for PY 2019 as an example. In the Title II Adult Education program, just over one million participants received career services at an average cost of \$129.50 per person, while under 40,000 received training at an average cost of \$449.45. This represents an abysmally low investment in people confronting barriers to success and even less than was spent per participant in PY 2018.

**Figure 1: Statewide Performance Report – WIOA Title II Adult Education Program PY 2019<sup>1</sup>**

PROGRAM		TITLE (select one):			
STATE: NATIONAL SUMMARY	Title I Local Area:	Title I Adult	<input type="checkbox"/>	Title II Adult Education	<input checked="" type="checkbox"/>
REPORTING PERIOD COVERED (Required for current and three preceding years.)		Title I Dislocated Worker	<input type="checkbox"/>	Title III Wagner-Peyser	<input type="checkbox"/>
From (07/01/2019):	To (06/30/2020):	Title I Youth	<input type="checkbox"/>	Title IV Vocational Rehabilitation	<input type="checkbox"/>
		Title I and Title III combined	<input type="checkbox"/>		
SUMMARY INFORMATION					
Service	Participants Served (Cohort Period: 07/01/2019 - 06/30/2020)	Participants Exited (Cohort Period: 04/01/2019 - 03/31/2020)	Funds Expended (Cohort Period: 07/01/2019 - 06/30/2020)	Cost Per Participant Served (Cohort Period: 07/01/2019 - 06/30/2020)	
Career Services	1,075,311	1,008,947	\$139,253,800.02	\$129.50	
Training Services	38,260	30,491	\$17,195,957.13	\$449.45	

**Figure 2** presents data for the PY 2019 Title I Adult program, where spending per participant was higher — \$1,139 for Career Services and \$1,854 for Training Services — but still not anywhere near the cost for a quality educational program for an adult with foundational skill needs, which in 2017 was estimated to be more than \$7,000.<sup>2</sup>



Figure 2: WIOA Adult Performance PY 2019<sup>3</sup>

PROGRAM				
STATE:	Title I Local Area:	TITLE (select one):		
REPORTING PERIOD COVERED (Required for current and three preceding years.)		<input checked="" type="checkbox"/>	Title II Adult Education	<input type="checkbox"/>
From: 07/01/2019	To: 06/30/2020	<input type="checkbox"/>	Title III Wagner-Peyser	<input type="checkbox"/>
		<input type="checkbox"/>	Title IV Vocational Rehabilitation	<input type="checkbox"/>
		<input type="checkbox"/>	Title I and Title III combined	
SUMMARY INFORMATION				
Service	Participants Served (Cohort Period: 07/01/2019 - 06/30/2020)	Participants Exited (Cohort Period: 04/01/2019 - 03/31/2020)	Funds Expended (Cohort Period: 07/01/2019 - 06/30/2020)	Cost Per Participant Served (Cohort Period: 07/01/2019 - 06/30/2020)
Career Services	354,470	293,637	\$403,848,091	\$1,139
Training Services	147,365	88,326	\$273,158,348	\$1,854

## RECOMMENDATIONS

With WIOA legislation due for reauthorization, policy makers need to amend our federal education and workforce development law to strengthen definitions and provide joint guidance and incentives in order to ensure that its intended equity outcomes are realized.

**First, align definitions.** Current WIOA guidance offers contradicting definitions for career and training services. While federal guidance<sup>4</sup> tells a Title I Adult program to report English language learning and Integrated Education & Training as “individual career services,” the same guidance tells a Title II Adult Education program to report these activities as “training services.” Co-investment is hardly possible when programs do not have clear agreement on how services are defined.

**Second, clarify roles.** There is also a need to differentiate roles to support co-investment. Federal guidance is clear that all WIOA funds can cover the full range of services. This works well for local flexibility, but on the ground it can mean that adult education programs are hiring their own career counselors rather than utilizing the expertise in the Title I system, and youth programs are hiring their own high school equivalency instructors rather than utilizing the Title II system. Guidance and incentives for state and local leaders to create aligned strategies for serving shared populations can both increase the quality of services and provide higher return on investments in those services. Federal toolkits<sup>5</sup> provide samples to support funding alignment; these need to be raised up within reauthorization and rewarded through incentives for co-enrollment in strategically aligned partnerships.

**Third, pool or braid funds.** Congress authorized Performance Partnership Pilots for Disconnected Youth (P3) to support co-investment and the development of a more efficient and integrated education and workforce development system to support out-of-school youth. Initial evaluations show positive findings for credential completion and employment under certain interventions including case management and WIOA career and training services.<sup>6</sup> To support more co-investment in proven strategies, WIOA reauthorization should incorporate authority that would allow tribal, municipal, county, and state governments to request flexibility and grant waivers to pool resources from various WIOA Titles and WIOA Partner Programs<sup>7</sup> to build career pathway systems and programs in exchange for improved outcomes for low-income youth and adults in the domains of education, training, employment, earnings, health and wellbeing.

While P3 models show impact, they also rely on waivers and, in some sense, risk-takers within the public systems to operationalize pooled funding. Another option is to **braid funding**—to utilize separate funding streams together in a way that still allows clear reporting back to each funding source. WIOA reauthorization can provide incentives for co-enrollment and templates for braided funding across WIOA program partners to help state and local leaders understand the leverage points for differentiating services for shared populations.

One advantage of braided funding is building cross-system understanding of partners' services and performance structures. This understanding supports local decision making on *who* does *what* within a specific intervention. California public systems created a braided funding worksheet to support their career pathway co-investment. When deciding on which fund to braid into each key task, the partners also differentiated which partner was responsible for that key task. For example, partners can decide that providing support services and career navigation is the responsibility of the Title I Adult partner while designing and delivery the integrated education and training is undertaken by the Title II Adult Education and Perkins Career Technical Education partners.

## SUMMARY RECOMMENDATIONS FOR WIOA REAUTHORIZATION

- Legislate joint cross title alignment of definitions of career services and training services, so that partners share a common understanding of services.
- Require aligned joint guidance from the U.S Departments of Labor and Education on reporting co-enrollment and co-investment with WIOA Combined State Plan partners.
- Provide incentives for braided funding in strategic co-enrollment and co-investment with WIOA Combined State Plan partners.
- Promote continued experimentation with pooled funding efforts beyond youth, building from the evidence base developing under the P3 pilots.

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<sup>1</sup> Statewide Performance Report – WIOA Title II Adult Education Program PY 2019. Retrieved from <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/spr/py2019/nationalsummary.pdf>

<sup>2</sup> Investing in Quality – Literacy Assistance Center. Retrieved from [https://drive.google.com/file/d/1v\\_F0voDHFzjMbbG4UA7Ova4sqWFs3jmy/view](https://drive.google.com/file/d/1v_F0voDHFzjMbbG4UA7Ova4sqWFs3jmy/view).

<sup>3</sup> WIOA Adult Performance PY 2019. Retrieved from <https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/PY%202019%20WIOA%20Performance%20Summary.pdf>

<sup>4</sup> Training and Employment Guidance Letter 10-16 Change 1. Retrieved from [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_10-16-Change1.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_10-16-Change1.pdf); Program Memorandum OCTAE 17-2. Retrieved from <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-2.pdf>

<sup>5</sup> DOL ETA Career Pathways Toolkit. Retrieved from [https://careerpathways.workforcegps.org/resources/2016/10/20/10/11/Enhanced\\_Career\\_Pathways\\_Toolkit](https://careerpathways.workforcegps.org/resources/2016/10/20/10/11/Enhanced_Career_Pathways_Toolkit)

<sup>6</sup> Local Evaluations of the Cohort 1 P3 Pilots: A Synthesis of Their Findings. Retrieved from [https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/ETA\\_P3\\_SynthesisReport\\_June2020.pdf](https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/ETA_P3_SynthesisReport_June2020.pdf)

<sup>7</sup> The WIOA Partner Programs include: (HHS-administered) TANF; Community Services Block Grant; (ED-administered) Career and Technical Education programs authorized under Perkins V; (USDA-administered) Employment and Training programs and Work programs under the Supplemental Nutrition Assistance Program; (DOL-administered) Trade Adjustment Assistance for Workers programs; Jobs for Veterans State Grants programs; Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law); Senior Community Service Employment program; and Reintegration of Ex-Offenders; and (HUD-administered) Employment and Training activities carried by the Department of Housing and Urban Development.



# CAREER PATHWAYS – INTEGRATED EDUCATION & TRAINING

## DEFINED FOR EQUITY

Effective career pathways require partnership. No one program or institution can build a comprehensive, responsive program to meet the complex educational and economic needs of individuals confronting barriers to success.<sup>1</sup> Career pathways are an equity tool for aligning high quality services to build equitable outcomes for people in our public education and workforce development systems. A decade ago, a federal interagency workgroup pledged a cross-agency commitment to career pathways.<sup>2</sup> The three federal investments in adult learning – WIOA, Perkins V, and Higher Education Act – now all share the same definition of career pathway and, within it, the Integrated Education and Training (IET) delivery model.

The term “career pathway” means a combination of rigorous and high-quality education, training, and other services that—

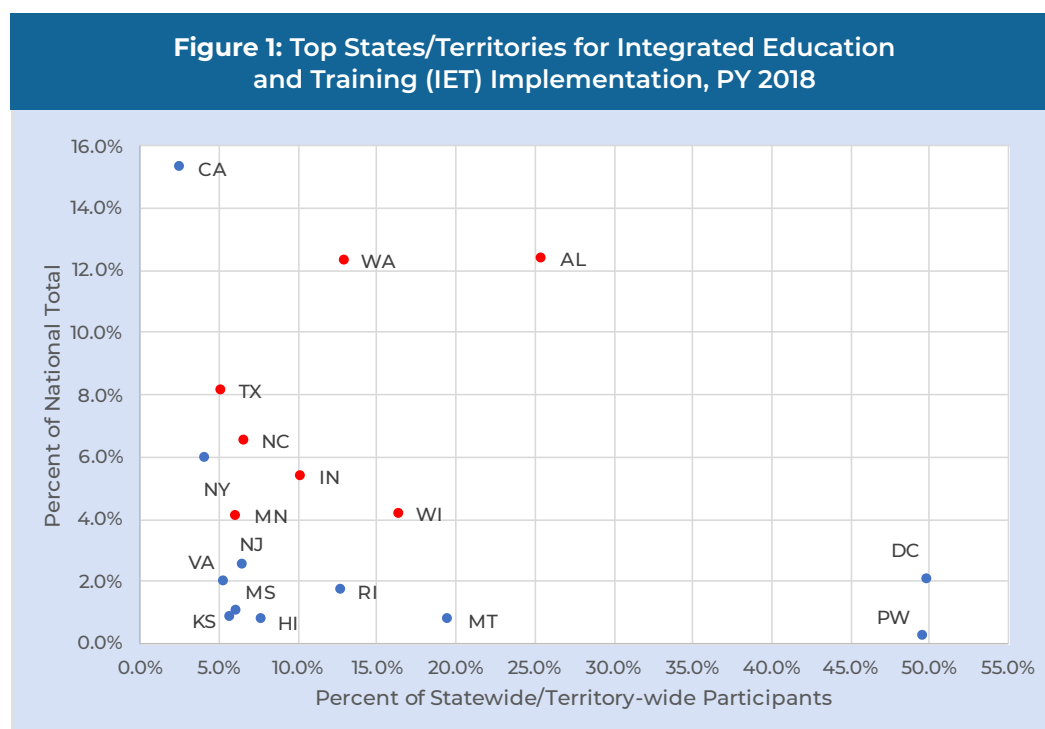
- (A) aligns with the skill needs of industries in the economy of the State or regional economy involved;
- (B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937;
- (C) includes counseling to support an individual in achieving the individual's education and career goals;
- (D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- (E) organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
- (F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- (G) helps an individual enter or advance within a specific occupation or occupational cluster.

## WIOA QUANTITATIVE REPORTING

While WIOA requires state and local strategic planning and implementation of career pathways, there is no reporting mechanism on those efforts except within WIOA Title II Integrated Education & Training (IET). From PY 2016 to PY 2018, the total national enrollments in IET grew substantially. During this period, IET enrollments increased by 123 percent, and while that is an impressive growth rate, in actuality the IET percentage of *total* participants rose just from 1.6 percent to 3.9 percent of total WIOA Title II participants (see **Table 1**).

Nine states represented more than four percent of the PY 2018 national IET total, and together accounted for about three-quarters of IET programming in that year (**Figure 1**). Sixteen states had more than five percent of their statewide participants enrolled in IET during PY 2018. Seven states fell into both categories (see red data points in **Figure 1**).

Table 1: IET Total Enrollments, PY 2016 - 2018				
Program Model	2016	2017	2018	2016 - 2018 Percent Change
IET Participants	23,301	43,905	51,915	122.8%
IELCE Participants	116,683	160,128	167,326	43.4%
Total Participants <sup>2</sup>	1,492,137	1,433,599	1,332,457	-10.7%
IET Percent of Total Participants	1.6%	3.1%	3.9%	



## FEDERAL ASSISTANCE

The Office of Career Technical and Adult Education (OCTAE) continues to build technical assistance projects to support IET scale; e.g. implementing IET Design Camps<sup>3</sup> in each state and in correctional settings.

OCTAE's recent reinterpretation of WIOA performance accountability to allow the use of all Measurable Skill Gain types for negotiated target setting within IET and workplace education programs<sup>4</sup> should finally provide more authentic ways for states to document learning.

Importantly, the IES What Works Clearinghouse released an intervention report<sup>5</sup> documenting IET's benefits and a complementary WWC Practice Guide for implementing career pathways in community colleges. For community colleges, it is especially important to help leaders understand that their current intra-institutional *guided pathway* reforms will make them even better partners in adult career pathway work.

Like dual enrollment for high school students, IET works and works well for all learners, helping them move farther, faster through a focus on acceleration rather than remediation. So how can WIOA reauthorization create more incentives for partners to build these pathways?

## RECOMMENDATIONS

- Invest in career pathways. WIOA reauthorization should include a dedicated investment in WIOA Title II AEFLA and in WIOA Title I Adult and Youth for career pathway programs, with an emphasis on strategic co-enrollment to comprehensively support older youth and adults through education and career progression.
- Create joint U.S. Departments of Education and Labor guidance on building these programs into state and local Eligible Training Provider Lists to promote strategic co-investment.
- Require state level policies on IET performance accountability, including Measurable Skill Gain types 3-5 for IETs. OCTAE requires all WIOA Title II state agencies to have an assessment policy, exclusively related to standardized pre-post testing.<sup>7</sup> With recently expanded access to MSG types 3-5 within IET, OCTAE's assessment plan requirement should broaden. Assessment policies should require states to guide local providers in intentionally building IET programs with alternative assessment and documenting training milestones and skill progression.
- Support dual enrollment between WIOA Title II and community college career pathways through a national awareness campaign and technical assistance project promoting the use of the Higher Education Act Ability to Benefit provision, allowing adult learners to simultaneously work on secondary and postsecondary credential attainment while accessing federal student aid.
- Support dual enrollment between WIOA Title II and community colleges through correcting the misinterpretation of Measurable Skill Gain type 1c 'transition to postsecondary' as an exit measure rather than an interim progress measure.

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<sup>1</sup> WIOA uses 'individuals with barriers to employment' to designate priority populations. See discussion on Confronting Barriers (p.19) for a recommendation on asset-based language in reauthorized legislation.

<sup>2</sup> Joint Letter on Career Pathways from the U.S. Departments of Education, Health and Human Services, and Labor. Retrieved from <https://www2.ed.gov/about/offices/list/ovae/ten-attachment.pdf>.

<sup>3</sup> IET Design Toolkit. Retrieved from [lincs.ed.gov/professional-development/resource-collections/profile-8850](https://lincs.ed.gov/professional-development/resource-collections/profile-8850).

<sup>4</sup> Resources for Reporting Measurable Skill Gains (MSG) Types 3, 4, and 5. Retrieved from <https://nrsweb.org/policy-data/Resources-for-Reporting>

<sup>5</sup> Integrated Basic Education and Training (I-BEST) Intervention Report. Retrieved from [https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/WWC\\_I-BEST\\_Report\\_508.pdf](https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/WWC_I-BEST_Report_508.pdf)

<sup>6</sup> Designing and Delivery Career Pathways at Community Colleges. Retrieved from <https://ies.ed.gov/ncee/wwc/PracticeGuide/27>.

<sup>7</sup> State Assessment Policy Guidelines. Retrieved from <https://nrsweb.org/resources/state-assessment-policy-guidelines-508-compliant-version>.

# PERFORMANCE ACCOUNTABILITY

## WIOA QUANTITATIVE REPORTING

To act as an equity investment, WIOA requires disaggregated reporting in order to ascertain who is receiving services and to what impact.

### Who Is Being Served?

Target populations are defined in 'individuals with barriers to employment'<sup>1</sup> and mapped to race/ethnicity and age demographics. Education services for 'basic skills deficient' participants cover a range of Education Function Levels.<sup>2</sup> World Education's analysis of Program Year (PY) 2016-2018 WIOA Title II Adult Education and Family Literacy state data shows increasing levels of service to target populations (see **Figure 1**).

Reporting indicates a gradual increase of the proportion of adult education participants designated as English language learners (see **Figure 2**) and remarkably consistent race/ethnicity participation (see **Figure 3**).

### What Outcomes Are They Achieving?

WIOA title II Adult Education services are reaching their intended target, but to what result? WIOA introduced reporting on employment and credential measures and Title II has begun to report those outcomes in PY2017 and PY2018 (see **Figure 4**).

Adult Education continues to focus on reporting Measurable Skill Gains which are the type of performance measure used in WIOA Title II negotiated target setting. WIOA introduced five Measureable Skill Gain types. However, the U.S. Department of Education only recently allowed performance reporting on all five types beginning PY 21 and then only in limited program models.<sup>3</sup> Hopefully, these other MSG types will continue to become a larger piece of the pie as Adult Education participants demonstrate more skill gains through occupational exams and training milestones (see **Figure 5**).

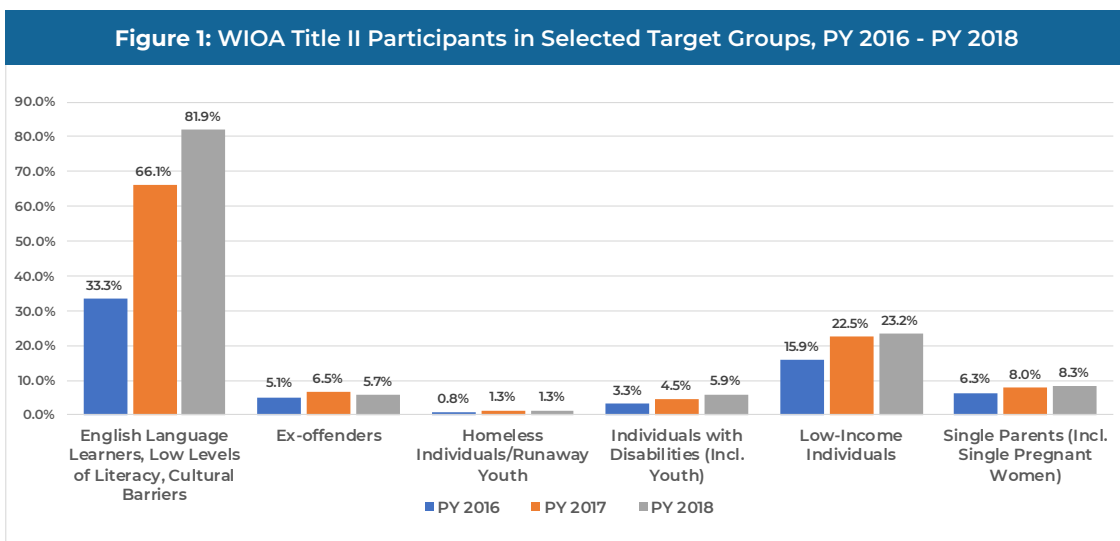


Figure 2: Educational Functioning Level Shares, PY 2015 - PY 2018

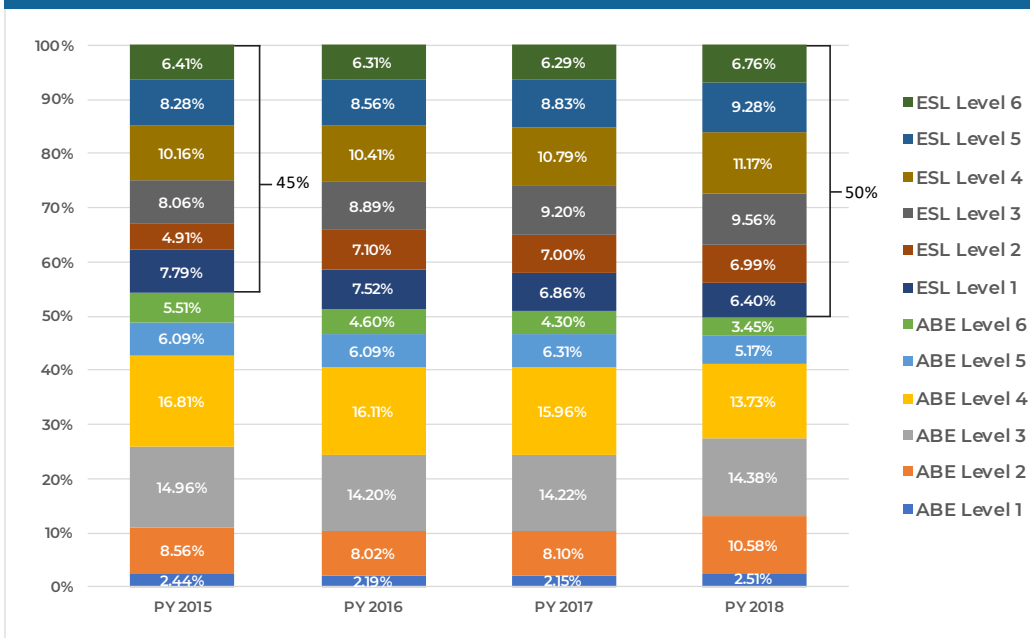


Figure 3: WIOA Title II Participants by Race/Ethnicity

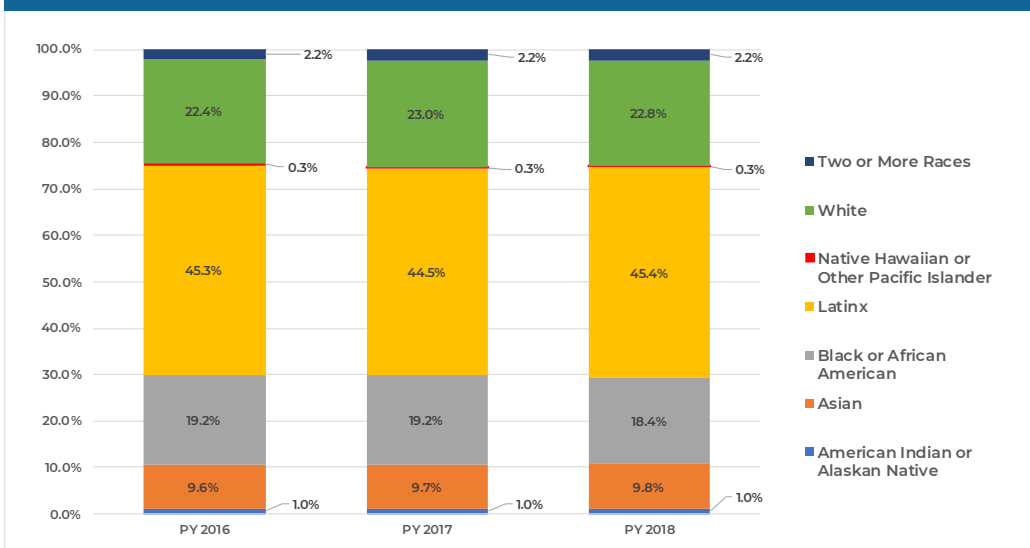
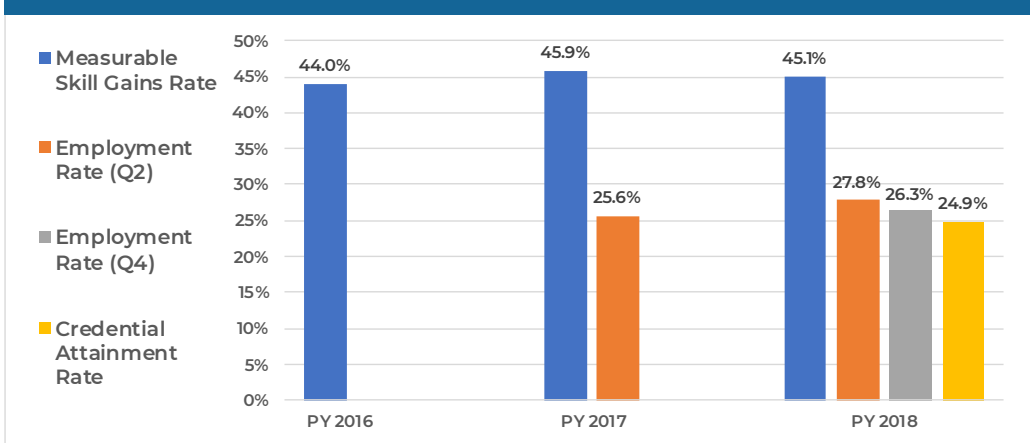
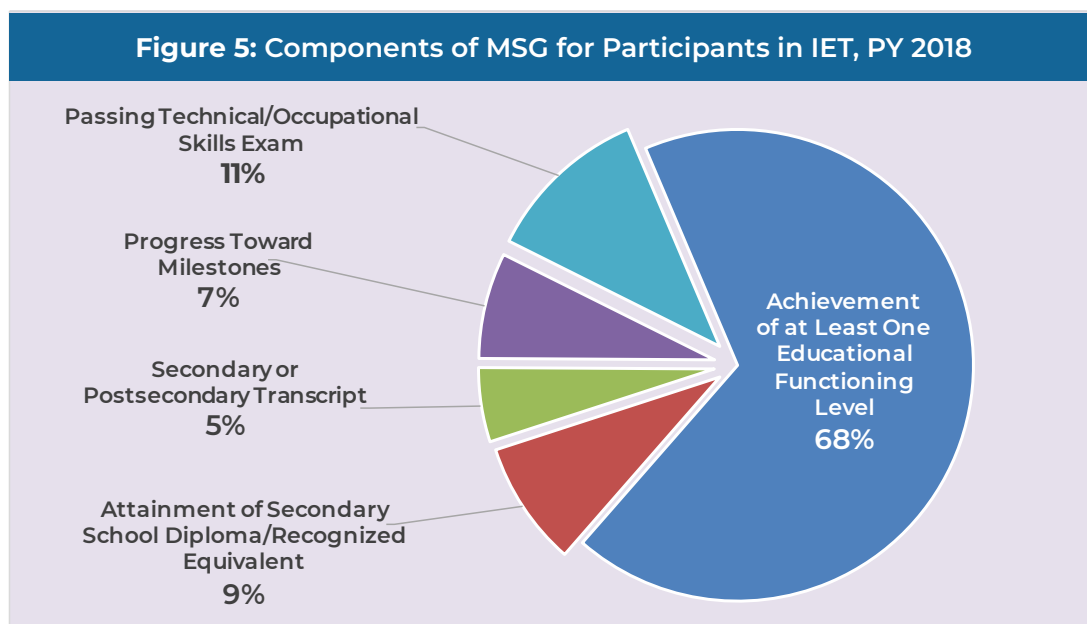


Figure 4: National Outcomes for WIOA Title II – Rate Measures



**Figure 5: Components of MSG for Participants in IET, PY 2018**



## RECOMMENDATIONS

WIOA Title II will continue to use Measurable Skill Gain as its primary performance metric, but the system needs more and better ways to assess skill gains.

- OCTAE should implement demonstration pilots for AEFLA providers modeled after the Every Student Succeeds Act (ESSA) Innovative Assessment and Accountability (IADA) Demonstration Pilots. IADA allows participating states to pilot innovative new systems of assessments in a subset of school districts before scaling statewide. States may apply on their own or as part of a consortium of up to four states. Such demonstrations could be used to encourage experimentation in developing assessment models related to:
  - o Competency-based education; or
  - o Placement practices that do not engage standardized testing, including self-placement.

All WIOA Titles need better ways to measure engagement with employer partners.

- Reauthorization should include a shift from the current emphasis on measuring employer engagement (e.g., market penetration, repeat business) to employer investment, in which the focus is on counting employer involvement in education and training that includes substantive investments by the employer in its workforce. This could include activities such as on-the-job training, internships, incumbent worker training, and other forms of workplace education, as long as they involve improvements to the educational skills of workers.

For WIOA to reach its vision of equitable outcomes for individuals confronting barriers and person-centered service models, reauthorization must reconceive the Statistical Adjustment Model (SAM) to incentivize service to more individuals confronting barriers. WIOA Section 116 requires the U.S. Departments of Education and Labor to use a Statistical Adjustment Model as part of their negotiation with states for setting goals for the WIOA measures. Under law, the SAM must account for differences among states in the characteristics of the participants being served, as well as the labor market conditions in which those participants are being served.

- Reconsider SAM approaches with a view toward development of models that permit more robust adjustments for changes in participant characteristics, so that the models are doing more to adjust for these differences among local program operators.



- Require submission of individual participant record data by WIOA Title II and IV state administering agencies, including individual characteristics and outcomes. Use these data to support SAM development. Development of a single national model for each common measure should include data for each of the core programs, at a minimum.
- Amend WIOA to reinstate performance incentive funding for states and local workforce development boards. An accountability policy that only includes sanctions for failure is not likely to motivate local program operators to excel. WIA performance outcomes received significant local attention due in large part to the fact that local boards stood to garner additional funds for exceeding their local goals.
- Include provisions in WIOA incentive funding to reward states and local operators for reducing racial and other equity gaps in outcomes.

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<sup>1</sup> WIOA uses ‘individuals with barriers to employment’ to designate priority populations. See discussion on Confronting Barriers (p.19) for a recommendation on asset-based language in reauthorized legislation.

<sup>2</sup> WIOA Title II’s National Reporting System requires sorting all participants into one of 12 Education Function Level categories: Adult Basic Education 1-6; English as a Second Language 1-6.

<sup>3</sup> Resources for Reporting Measurable Skill Gains (MSG) Types 3, 4, and 5. Retrieved from <https://nrsweb.org/policy-data/Resources-for-Reporting>.

<sup>4</sup> Retrieved from <https://aurora-institute.org/blog/the-u-s-department-of-education-is-inviting-new-applications-for-round-3-of-the-innovative-assessment-demonstration-authority-iada>

# SYSTEM INTEGRATION

## WIOA STRATEGIC PARTNERS

To act as an equity investment, WIOA requires state and local partners to strategically plan and implement complementary services in order to comprehensively support individuals confronting barriers to educational and economic mobility.<sup>1</sup>

Under WIOA, states choose to develop a four-year **Unified** or **Combined** State Plan describing the state's strategies to use the workforce development system to improve individual prosperity and regional economic competitiveness.

The minimal requirement is a Unified State Plan that demonstrates alignment among the six WIOA core partner programs: Title I Adult, Dislocated Worker, and Youth; Title II Adult Education; Title III Wagner–Peysner Employment Service; and Title IV Vocational Rehabilitation Services. The U.S. Department of Education oversees Titles II and IV while the U.S. Department of Labor governs Titles I and III. In the states, as many as four agencies oversee WIOA core partners and many more are involved as *required* partners.

In introducing the Combined State Plan option, WIOA promotes expanded partnerships through encouraging broad joint planning with other education, public benefit, and workforce development programs. However, there is limited uptake by states to use this federal flexibility. While 62 percent of states did submit Combined 2020 plans, the partners identified as jointly planning with the required WIOA core partners are mainly small-scale federal workforce development programs run within the same agency as WIOA Title I, e.g., trade adjustment assistance, veterans' state grants, senior community service program.

The partner listed in the WIOA State Plan template with the greatest potential to impact career pathway educational services is the Strengthening Career and Technical Education for the 21<sup>st</sup> Century (Perkins V) system. Eleven states submitted WIOA/Perkins combined plans: Alabama; Delaware; District of Columbia; Indiana; Minnesota; New York; Ohio; Pennsylvania; Rhode Island; Vermont; and Virginia. A limited number of states took the opportunity to strategize with public benefit program partners such as TANF, SNAP E&T, in support of shared participants.

The text of WIOA promotes integration, but implementation has kept programs pigeon-holed and participants largely responsible for cobbling together needed services. A bolder approach is needed.

## WIOA REAUTHORIZATION RECOMMENDATIONS

Amend WIOA to embed provisions in Section A of Title I - System Alignment focused on service integration, specifically on utilizing co-enrollment, shared performance accountability, and braided funding to comprehensively and efficiently serve WIOA participants. Change the title of Section A to System Alignment and Integration.

This Title should accomplish these goals:

- State overall federal policy on skill development integration comprehensively among all named core and required partners.
- Define target populations across programs and authorize the U.S. Departments of Education and Labor to provide guidance regarding participant co-enrollment, including guidelines to determine what to do with participants without work authorization.

- Create common definitions across programs, including ‘career’ and ‘training,’ so that these are defined as the same activity across each of the titles with a level of precision and clarity that would provide adequate direction to the field in absence of regulations. Define these key terms in the Definitions section of the law.
- Amend the authorizing statutes for antipoverty and economic mobility partners, including TANF ES (Temporary Assistance to Needy Families Employment Services); SNAP E&T (Supplemental Nutrition Assistance Program Employment and Training); HUD E&T (Housing and Urban Development Employment and Training); Opportunity Zones; TAA (Trade Adjustment Assistance). These amendments should address the requirement for coordination, specify partnership roles and responsibilities, and address braided resources and reporting. Alternatively, include authority for tribal, municipal, county and state governments to request — in exchange for improved outcomes — flexibility including waivers to pool all federal discretionary resources where workforce development activities are permissible.
- Establish shared performance metrics across all federal education and training investments. These metrics would be used to highlight how workers and businesses are being served by those programs, to identify racial and other equity gaps where they exist, and require corrective actions where programs are not meeting performance goals.
- Include Perkins V, TANF and HEA in a coordinated accountability system with the WIOA core titles. In addition to the use of the common WIOA metrics, this would provide for inclusion of these programs in the negotiation of state-level goals and authorize the U.S. Departments of Education and Labor to develop coordinated approaches to reporting.
- Authorize Higher Education Act Financial Services Administration adult dual enrollment to support accelerated models of secondary-postsecondary credential attainment for adult learners.
- OCTAE should implement demonstration pilots for AEFLA providers modeled after the Every Student Succeeds Act (ESSA) Innovative Assessment and Accountability (IADA) Demonstration Pilots. IADA allows participating states to pilot innovative new systems of assessments in a subset of school districts before scaling statewide. States may apply on their own or as part of a consortium of up to four states. Such demonstrations could be used to encourage experimentation in developing assessment models related to:
  - Competency-based education; or
  - Placement practices that do not engage standardized testing, including self-placement.
- Implement an integrated performance accountability system among the WIOA core titles. This integrated performance system would include:
  - Participant-level data collection by US ED and USDOL to support the effective measurement of results for each of the core measures, including access to appropriate administrative records within a framework that protects participant privacy;
  - A common approach to state and local goal setting across the programs, including an expanded statistical adjustment model process that incorporates data from all core program titles;
  - Reinstatement of incentive funding for exemplary performance for each of the core programs, including incentives for reduction in equity gaps;
  - Departmental authorization to issue guidance, waivers, and technical assistance, as needed, to facilitate the implementation of an integrated performance management model, including

permitting shared reporting of jointly managed services, such as career pathways programs, and technical assistance on performance reporting for integrated service delivery to common participants; and

- o Improvement of the measurement of the effectiveness of the system in serving employers, so that this measure is appropriately applied across all core partners, as well as other partners in the American Job Center. Additionally, refocus the metric on shared investment in employee reskilling by employers with the public workforce system and on hiring WIOA participants into quality, living wage jobs.

## Confronting Barriers

### Barriers To Success

WIOA seeks to direct services to those most in need in local communities through disaggregated reporting to a category of people deemed “individuals with barriers to employment.” This prioritizing of public resources is a laudable goal and the list of barriers is comprehensive and derived from data demonstrating the relationship between a barrier and unemployment rates. However, the characterization of the individual as containing the barrier is counterproductive in designing the very workforce development interventions needed to address those barriers, only some of which are temporary and situational, like homelessness. Further, this deficit-based framing disrespects those we serve and further taints the WIOA system and WIOA system participants as being individuals in need of fixing, with the “fix” frequently being placement in a low-quality job and an ‘exit’ from services.

### Recognize Assets

WIOA reauthorization needs to address this deficit-based language while maintaining critical reporting on who receives what services and to what impact. One way to do this would be to reframe ‘individuals with barriers’ to ‘individuals CONFRONTING barriers’ and to clearly articulate the public workforce system’s role to support that confrontation with resources needed to overcome barriers. Reauthorization should also involve a stakeholder consultative process, much like that included in Strengthening Career & Technical Education for the 21<sup>st</sup> Century Act (Perkins V) in which people confronting the barriers detailed in WIOA priority populations should be involved in designing the services for their communities. Adults in our communities have skills and experiences that can be a powerful starting point for building toward their career aspirations. WIOA needs to leverage job seekers’ assets in order to design more effective solutions.

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<sup>1</sup> Note recommendation to change WIOA’s Individuals with Barriers to Individuals Confronting Barriers (see text box above).

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**Questions or Comments?** Please contact Judy Mortrude, Senior Technical Advisor at World Education's National College Transition Network: [judy\\_mortrude@worlded.org](mailto:judy_mortrude@worlded.org).