



National Coalition For Literacy

March 5, 2013

The Honorable John Kline
Chairman, Education and the Workforce Committee
2181 Rayburn House Office Building
Washington, DC 20515

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

Dear Chairman Kline and Representative Foxx:

On behalf of the National Coalition for Literacy, a coalition of 35 foremost national and regional organizations dedicated to advancing adult education, family literacy, and English language acquisition in the United States, I am writing to inform you that we oppose The *Supporting Knowledge and Investing in Lifelong Skills* ("SKILLS") Act (H.R. 803).

While we strongly support the long-awaited reauthorization of the Workforce Investment Act (WIA), H.R. 803 would threaten the ability of states and communities to educate low-skilled adults and English language learners and prepare them for self-sufficiency, not improve it. Over 17.6 million adults do not have a high school diploma or equivalency in the U.S., and unemployment rates for these workers are at nearly twice the rate as their higher-educated peers. Instead of making targeted investments in these workers who are most in need of services, the bill provides for consolidation of this scarce funding into a general purpose fund for all workers—not just those who are underserved.

The Coalition supports efforts to better coordinate and align our nation's education and training systems, but believe that H.R. 803 does not smartly achieve this goal. We suggest the following improvements to the bill, which we believe would strengthen H.R. 803 and ensure that more low-skilled individuals are provided with the education and skills training they need to transition to further education or employment.

- 1) **Remove adult education as an option for consolidation under the State Unified Plan.** Section 142 ("State Unified Plan") of H.R. 803 allows for states to consolidate their federal adult education funding and other funding streams into a newly-created Workforce Investment Fund. The allowance for states to consolidate federal funding with other funding streams under an approved unified state plan is likely to reduce the provision of services to adults with low basic skills or limited English. Adult education students are a unique population, often having different needs than higher-skilled workers that are unlikely to be addressed in a traditional job training program. Forty-one percent of adult education students have limited English skills, nearly 50-80 percent may have learning disabilities, and the majority is unemployed. In a time of scarce resources, a consolidated approach to education and training programs that serves all workers will inevitably leave behind those workers with the highest instructional need or those who are the hardest to serve. A case-in-point is what has occurred in California where, in 2009, the state relaxed rules on how school boards can allocate

funding for education. This resulted in an effective cut in state adult education funding by nearly half, from \$754 million to \$400 million, and a reduced capacity of the system, which now serves hundreds of thousands fewer students than in 2009.

- 2) **Restore the Maintenance of Effort Provision.** Eliminating the maintenance of effort requirement that requires states to maintain 90 percent of the fiscal effort per student or aggregate expenditure or face a proportionate reduction in federal funding puts adult education funding in jeopardy. While states would still be required to provide a 25 percent nonfederal match (an existing requirement under the law), eliminating this “maintenance of effort” provision could result in significant declines in state and local funding and threaten the availability of services to adults with lower basic skills or limited English proficiency.
- 3) **Safeguard students against tuition or fee hikes as a potential result of adding for-profit entities as an eligible provider of federal AEFLA funds.** While for-profit agencies are often a key source of innovation in education, broadly expanding the availability of federal funds to these types of providers—which often charge for their services—requires a careful consideration of the potential impact on student access. The students served by adult education and English language services are often low-income individuals and youth who have been unsuccessful in the K-12 system, taking the initiative to improve their lives and the lives of their families. States and local programs widely recognize that making these services readily accessible is critical. In fact, charging tuition for adult education or English language services is prohibited in 22 states. The bill should include provisions that protect students from tuition charges that would pose an insurmountable barrier to student access.
- 4) **Codify English Language/Civics.** At the present time, the English Language/Civics program exists on a year-to-year basis through the appropriations process. NCL recommends making this program a permanent part of the Adult Education and Family Literacy Act (Title II of WIA). It addresses the needs of a unique and rapidly increasing portion of those adults in need of adult education services. Individuals in need of English literacy (ESL) services already comprise nearly half of the students served under WIA Title II. Furthermore, proposed English language requirements in forthcoming immigration reform will expand the need for these programs significantly.
- 5) **Restore the required state leadership funds to a minimum of 15 percent of the state grant and require professional development and technical assistance to eligible providers.** Professional development, which is often provided through state leadership funds, is the primary mechanism for preparing adult educators with the knowledge and skills about instructional practices that spur adult student achievement. Research shows that most adult educators have limited formal education specifically related to teaching adults. Furthermore, the re-vamp of the GED in 2014 to an assessment that is aligned to college and career readiness as well as 21st century skill needs will require extensive curriculum re-design and professional development for instructors.
- 6) **Retain the National Institute for Literacy (NIFL) and redefine it to meet 21st century adult education needs.** In 2010, Congress de-funded the National Institute for Literacy (NIFL), the nation’s primary research center for adult education and literacy. Unlike elementary/secondary education and higher education, there is virtually no research on best practices for serving low-skilled adult learners. Also unlike these systems, there are no private and independent national adult education research centers to fill this void. There are also only a very limited number of graduate-level adult educator programs from which new research emerges. Although NIFL is currently not funded, removal of authorizing language for such an institute further guarantees the lack of this important research for the nation.

While we oppose H.R. 803 in its current form, we are interested in working with you and other Committee members to develop bipartisan legislation that will serve adult learners and workers most in need of services. If you have questions about these recommendations, please contact our advocacy co-chairs, Jackie Taylor (Jackie@jataylor.net) and Marcie Foster (mwmfoster@clasp.org).

Sincerely,

A handwritten signature in cursive script that reads "Martin Finsterbusch".

Martin Finsterbusch
NCL President 2011-2013

CC: Representative Phil Roe, Representative Ruben Hinojosa, Representative George Miller