

**TEXAS WORKFORCE COMMISSION  
ADULT EDUCATION AND LITERACY LETTER**

<b>ID/No:</b>	AEL 04-16
<b>Date:</b>	September 15, 2016
<b>Keyword:</b>	AEL; Fiscal Administration; WIOA
<b>Effective:</b>	October 15, 2016

**To:** Adult Education and Literacy Grant Recipients  
Local Workforce Development Board Executive Directors  
Commission Executive Offices  
Integrated Service Area Managers

**From:**   
Reagan Miller, Deputy Director, Workforce Solutions

**Subject:** **Implementing Integrated Education and Training English Literacy and Civics Education**

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**PURPOSE:**

To provide Adult Education and Literacy (AEL) grantees<sup>1</sup> with information and guidance on implementing Workforce Innovation and Opportunity Act (WIOA) §243, Integrated Education and Training English Literacy and Civics Education (Integrated EL Civics).<sup>2</sup>

**BACKGROUND:**

WIOA strengthens alignment among AEL providers, postsecondary education and training providers, Local Workforce Development Boards (Boards), and employers, and reinforces AEL's strategic plan goal, which is to support increases in employment, higher education transition, skill gains, and secondary education completion through demonstrated approaches that integrate system services and leverage community partnerships. To support this purpose, WIOA underscores the use of flexible service delivery options within its various programs, including Integrated EL Civics program activities and Integrated Education and Training (IET) as described in AEL Letter 02-16, "Implementing the Integrated Education and Training Service Approach."

WIOA Title II and subsequent federal regulations make distinctions that govern Integrated EL Civics program service delivery depending on the WIOA funding source.

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<sup>1</sup> For the purposes of this AEL Letter, AEL grantees are entities that will be Texas Workforce Commission grantees funded with AEL funds.

<sup>2</sup> Capitalization represents terms that have specific definitions outlined in this AEL Letter or in other AEL Letters, guides, state or federal laws, or other publications cross-referenced in this AEL Letter.

## **PROCEDURES:**

**NLF**: AEL grantees must be aware of the following definitions:

**Coenrollment** means enrollment of an eligible individual in two or more of the six core programs administered under WIOA, which include the following:

- Adult, dislocated worker, and youth programs (WIOA Title I);
- Adult Education and Family Literacy Act (AEFLA) (WIOA Title II);
- Employment Service program under the Wagner-Peyser Act of 1933 (WIOA Title III); and
- Vocational Rehabilitation program (Title I of the Rehabilitation Act of 1973).

In practice, the term often has a wider meaning, such as coenrollment between AEL and Workforce Training, regardless of the funding source.

**English Language Learner** means an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language, and whose native language is a language other than English; or who lives in a family or community environment where a language other than English is the dominant language.

**English Literacy and Civics Education Services (EL Civics)** means education services provided to adult English language learners, including professionals with degrees or credentials in their native countries, to enable them to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. EL Civics services must include instruction in literacy, English as a Second Language, and the rights and responsibilities of citizenship and civic participation, and may include Workforce Training.

**Integrated Education and Training English Literacy and Civics Education (Integrated EL Civics)** means a program funded under WIOA §243 for adult English language learners, including professionals with degrees and credentials in their native countries. WIOA §243 Integrated EL Civics funds require that the program service approach include EL Civics services in combination with IET for participants for whom IET services are appropriate. Additionally, the Integrated EL Civics program must:

- be designed to prepare adult English language learners for, and place them in, unsubsidized employment in existing and emerging in-demand industry sectors or targeted occupations that lead to economic self-sufficiency; and
- integrate with Board and Workforce Solutions Office functions to carry out the activities of the program.

**NLF**: *IET Requirement*: AEL grantees must use Integrated EL Civics funds allocated under WIOA §243 to provide EL Civics services in combination with IET.

Integrated EL Civics funds can be used to support the IET service approach outlined in AEL Letter 02-16, including Workforce Training and Workforce Preparation Activities. Integrated EL Civics must:

- include instruction in literacy and English as a Second Language;
- include instruction on the rights and responsibilities of citizenship and civic participation;
- be designed to prepare adult English language learners for, and place them in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency; and
- be integrated with Board and Workforce Solutions Office functions to carry out the activities of the program.

**NLF:** *Integrated EL Civics Targets:* AEL grantees must meet targets for Integrated EL Civics participants as outlined in AEL Letter 03-16, “Adult Education and Literacy Enrollment Targets for Program Year 2016–2017.”

**LF:** Once AEL grantees meet the Integrated EL Civics targets described in AEL 03-16, they may provide English language learners with EL Civics services without IET services using WIOA §243 funds.

**NLF:** Students who participate in EL Civics services and are not coenrolled in IET do not count toward the Integrated EL Civics targets described in AEL Letter 03-16; these do, however, count toward the total participant target described in AEL Letter 03-16.

**NLF:** AEL grantees must be aware that they cannot count a participant toward both the Career Pathways target and the Integrated EL Civics target as outlined in AEL Letter 03-16.

**NLF:** AEL grantees must use the following three unique activity code conventions in the Texas Educating Adults Management System (TEAMS) to describe program variations and funding sources:

- “IET (EL Civics),” when EL Civics is delivered with WIOA §243 funds in combination with IET;
- “EL Civics (EL Civics),” when EL Civics is delivered with WIOA §243 funds not in combination with IET;
- “El Civics (AEFLA),” when EL Civics is delivered with WIOA §231 funds not in combination with IET.

**NLF:** *Assessment Guidelines:* AEL grantees must follow assessment guidelines for English language learners receiving services with WIOA §243 Integrated EL Civics funds, as outlined in the Texas Adult Education and Literacy Assessment Guide (Texas AEL Assessment Guide). Currently, the National Reporting System (NRS) standardized tests approved for English language learner assessments in Texas include the *BEST Plus 2.0*, *BEST Literacy*, and *TABE® CLAS-E*.

**LF:** *Assessment of English Language Learners:* While AEL grantees may use any assessment test approved in the Texas AEL Assessment Guide for English language learners, when selecting a test, AEL grantees are strongly encouraged to take into consideration the intent for which the test publisher developed the test. The best results are attained when the intent of the test matches the purpose for testing. For example, if the purpose of the course or program is employment or employment advancement, best practice is to select tests that were developed to measure skills associated with these objectives.

The intended purpose of the tests approved for English as a Second Language are as follows:

- TABE<sup>®</sup> CLAS–E: These tests are “... an integrated system of assessments, instructional guidance, and staff development materials designed to measure adult learners’ English language proficiency and aid in transitioning learners into mainstream education programs or career paths.”
- BEST Literacy & BEST Plus 2.0: These tests are “intended to assess interpersonal communication using everyday language.”

AEL grantees are encouraged to be aware that the NRS Implementation Guidelines state that students who pretest in the highest range of the *BEST Literacy* should be retested using another assessment. Therefore, AEL grantees are encouraged to keep in mind that some tests assess advanced English language learners more accurately than other tests. Using tests with higher score ranges to establish baseline assessments of advanced English language learners can prevent these participants from “testing out” of the score range of a less suitable assessment tool.

For example, according to a *TABE<sup>®</sup> CLAS-E/TABE<sup>®</sup> 9 & 10* linking study reported in the *TABE<sup>®</sup> CLAS-E Technical Manual*, transition scores to the *TABE 9 & 10* are the following:

- *TABE<sup>®</sup> CLAS-E* Reading test: 588 (NRS Level 6) or above; and
- *TABE<sup>®</sup> CLAS-E* Writing test: 612 (NRS Level 6)

These higher transition scores allow grantees to accurately test higher-level English language learners for programs such as Integrated EL Civics.

**LF:** *Coenrollment of Participants:* AEL grantees may use the following two options for meeting the IET coenrollment requirement for IET EL Civics:

- Coenroll participants in IET services funded with non-AEL funds; or
- Use WIOA §243 Integrated EL Civics funds to provide IET.

Additionally, AEL grantees may find cost efficiencies through coenrolling participants in Workforce Training services funded through other sources, e.g., coenrollment of participants in other WIOA programs, community and technical college systems, or certain grants or state or federal financial aid that lower the

average cost per participant for Integrated EL Civics as outlined in AEL Letter 03-16.

While the IET EL Civics–allocated funds, and associated targets described in AEL Letter 03-16, must be used to deliver services in combination with IET to prepare participants for employment, some eligible participants do not require training and employment services because they are gainfully employed or self-employed. Alternatively, some participants may not yet have the English proficiency or academic preparation to enter and succeed in IET within a program year. AEL grantees are encouraged to find ways to not exclude or discourage these individuals from participating in activities funded under Integrated EL Civics funding allocations.

**LF:** *Participants Not Participating in IET:* AEL grantees that meet contracted targets for Integrated EL Civics at a lower cost per participant may use unexpended WIOA §243 Integrated EL Civics funds to provide EL Civics services for participants who do not require Workforce Training, or who do not yet have English proficiency or academic preparation for Workforce Training, including participants who would benefit from a career-focused curriculum or Workforce Preparation Activities to prepare for IET.

AEL grantees may also provide EL Civics services using AEFLA funds allowed under WIOA §231. When using AEFLA funds to provide EL Civics services, the program is not required to be provided in combination with IET services.

**NLF:** For participants who do not require Workforce Training and are funded with WIOA §243 funds, AEL grantees must request approval from their program support specialists to access the TEAMS activity code “EL Civics (EL Civics)” to track EL Civics services, which they can do once contracted targets for Integrated EL Civics have been met.

**NLF:** *Integration with Boards and Workforce Solutions Offices:* When implementing an Integrated EL Civics program, AEL grantees must integrate with the function of Boards and Workforce Solutions Offices when identifying in-demand industries and occupations and carrying out employment placement in such industries and occupations. Examples of integration include collaboration on identifying existing and emerging in-demand industry sectors or targeted occupations for IET training in the local workforce development area (workforce area); workshops or services provided as part of IET-required Workforce Preparation Activities; employment assistance; data and wage information for the workforce area or region; and the identification of employer partners to support program design, implementation, and employment placement.

**LF:** AEL grantees may apply additional program entry requirements for participants when implementing the Integrated EL Civics program with Boards, Workforce Solutions Offices, and Workforce Training providers.

**NLF:** AEL grantees must be aware that before implementing Workforce Training services under the IET service approach, they must submit the proposed IET program of study to the Texas Workforce Commission (TWC) through the Career Pathways Implementation Plan portal at <http://www-tcall.tamu.edu/twcael/grantees.htm>.

**NLF:** AEL grantees must report Workforce Training expenditures by funding source as part of the monthly expenditure reports submitted through TWC’s Cash Draw and Expenditure Reporting System.

**INQUIRIES:**

Direct inquiries regarding this AEL Letter to [aelpolicy.clarifications@twc.state.tx.us](mailto:aelpolicy.clarifications@twc.state.tx.us).

**RESCISSIONS:**

None

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**REFERENCES:**

Workforce Innovation and Opportunity Act of 2014 and appropriate regulations Implementation Guidelines: Measures and Methods for the National Reporting System for Adult Education, February 2016,

[http://www.nrsweb.org/docs/NRS\\_Implementation\\_Guidelines\\_February2016.pdf](http://www.nrsweb.org/docs/NRS_Implementation_Guidelines_February2016.pdf)

TABE Complete Language Assessment System—English. Technical Report (2009)  
CTB/McGraw-Hill LLC

AEL Letter 02-16, “Implementing the Integrated Education and Training Service Approach,” issued March 23, 2016

AEL Letter 03-16, “Adult Education and Literacy Enrollment Targets for Program Year 2016–2017,” issued July 14, 2016, and subsequent issuances

TABE CLAS-E Product Quick Facts. (n.d.). Retrieved August 30, 2016, from <http://www.ctb.com/ctb.com/control/ctbProductViewAction?productFamilyId=608&productId=865&p=products>

BEST Plus Trainer Manual. (2005). Washington, DC: Center for Applied Linguistics

**FLEXIBILITY RATINGS:**

**No Local Flexibility (NLF):** This rating indicates that AEL grantees must comply with the federal and state laws, rules, policies, and required procedures set forth in this AEL Letter and have no local flexibility in determining whether and/or how to comply. All information with an NLF rating is indicated by “must” or “shall.”

**Local Flexibility (LF):** This rating indicates that AEL grantees have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this AEL Letter. All information with an LF rating is indicated by “may” or “recommend.”