

TAB 8 for the 6/9/15 Public Meeting: Discussion, Consideration and Possible Action Regarding State Level Program Year 2015 Adult Education and Literacy Performance Measure Targets From the U.S. Department of Education

1 **Introduction** – On March 13, 2015, the U.S. Department of Education (ED) issued guidance on submitting PY15
2 target proposals. Staff submitted target proposals on March, 31, 2015 and reached agreement on the targets
3 with ED on June 5, 2015.

4 **Negotiations** - The performance accountability changes brought by the passage of the Workforce Innovation &
5 Opportunity Act (WIOA) do not go into effect until PY16 but the incentive and sanction provisions of the
6 Workforce Investment Act (WIA) expire at the end of PY14. That makes PY15 a transition year using WIA
7 measures and negotiation methods but without all of WIA’s incentive and accountability provisions.

8 The U.S. Department of Labor recognized the significant challenges that states and locals workforce
9 development boards would be experiencing in PY15 working to implement WIOA and opted to offer states the
10 opportunity to keep their PY14 targets.

11 The U.S. Department of Education looked at the transition year and saw it as an opportunity to set aggressive
12 targets under the theory that there were no consequences for failure (i.e., no sanctions). ED put out target
13 proposal guidance that required substantial increases in performance for many states – increases unlike any
14 staff had ever seen achieved¹.

15 Staff disagreed with ED’s assessment of PY15. Just because there would be no federal sanction authority
16 doesn’t mean that TWC wouldn’t want to hold our local AEL Grantees accountable if they fail to achieve
17 performance. Staff submitted targets that mostly followed ED’s guidance but which did not in three instances
18 where staff believed that the targets required by ED were likely not achievable, at least not achievable by most
19 Grantees.

20 Ultimately, ED accepted TWC staff’s initial proposals on two of the three measures and accepted a revised staff
21 proposal on the third. Page 2 provides more details related to the negotiations including PY13 performance,
22 staff’s proposed targets and the finally agreed upon targets (shaded in grey). With Commission approval, these
23 targets will become part of the state’s AEL State Plan.

24 **Commission Request** – The Commission is requested to approve the newly-agreed to targets listed on page 2 of
25 this briefing document.

¹ For example, ED’s guidance would have required TWC to achieve a 7 percentage point increase in Employment Retention over PY13 – TWC has never seen greater than a 5 percentage point shift in any 2 year period, even coming out of the Great Recession.

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	PY13 Perf	ED Target Guidance*	Agreed Upon Targets
ABE Beginning Literacy	75%	A level that demonstrates "Continuous Improvement"	75%
ABE Beginning	63%		63%
ABE Low Intermediate	63%		63%
ABE High Intermediate	56%		56%
ASE Low	64%		64%
ESL Beginning Literacy	63%		64%
ESL Low Beginning	68%		70%
ESL High Beginning	71%		72%
ESL Low Intermediate	74%		74%
ESL High Intermediate	64%		64%
ESL Advanced	66%		66%
Entered Employment	43%		45%
Retained Employment	56%	63%	61%
Entered Postsecondary Ed / Training	13%	22%	18%
HS Diploma/GED	66%	76%	60%

*In some cases ED’s Target Guidance specified a minimally acceptable level for each state/measure but where performance was already strong, the instructions were to simply demonstrate continuous improvement. Staff’s proposals on the first 12 measures listed followed the guidance but focused continuous improvement on the measures where TWC was not in the top 3 nationally. In the three cases that staff did not propose targets at levels consistent with ED’s guidance, staff provided detailed explanations to support the alternate proposals. A summary of these points and the negotiations follows:

Retained Employment	TWC proposed 61% because staff had never seen a 7 point improvement in any 2 year period. ED accepted this explanation and target proposal.
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Entered Postsecondary Ed / Training	TWC proposed 18% because TWC has been emphasizing the integrated education model which is a best practice supported by ED but which is not counted as successful in this measure. ED accepted this explanation and target proposal.
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HS Diploma/GED	PY13 Performance was primarily on the "Old Test". Scores on the New Test in PY13 were 52%. TWC initially proposed 55%. ED countered with 66%. TWC did additional analysis and found that performance would likely increase 3 points to 55% in PY14 and offered a target of 60% which ED accepted.
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