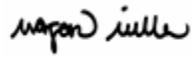


**TEXAS WORKFORCE COMMISSION  
ADULT EDUCATION AND LITERACY LETTER**

<b>ID/No:</b>	AEL 02-16, Change 1
<b>Date:</b>	October 13, 2016
<b>Keyword:</b>	AEL; Fiscal Administration; WIOA
<b>Effective:</b>	Immediately

**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 the Integrated Education and Training Service Approach—*Update***

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**PURPOSE:**

To provide Adult Education and Literacy (AEL) grantees<sup>1</sup> with updated information and guidance on implementing an Integrated Education and Training<sup>2</sup> (IET) service approach.

**CHANGES TO AEL LETTER 02-16:**

As revisions to AEL Letter 02-16 are substantial in this change letter, strikethrough of the original language to indicate deleted text and bold typeface to indicate new language have been omitted. Readers may request the original AEL Letter 02-16 by e-mailing [workforce.editing@twc.state.tx.us](mailto:workforce.editing@twc.state.tx.us) and including the letter number in the subject line.

**BACKGROUND:**

The Workforce Innovation and Opportunity Act (WIOA) strategically positions AEL to play an integral role within a broader, interconnected workforce development system and greatly expands the service-delivery options for participants with employment and postsecondary education and training goals. This strategic position provides customers with greater access to workforce and education services through Texas Workforce Solutions, and increases access to a broader array of services available.

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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.

WIOA strengthens alignment among AEL providers, Local Workforce Development Boards (Boards), postsecondary education and training providers, and employers, and reinforces AEL's strategic plan goal: To support increases in employment, postsecondary education and training transition, skills gains, and secondary completion through demonstrated approaches that integrate system services and leverage community partnerships.

WIOA underscores the use of flexible Career Pathways service-delivery options within its various programs.

IET aligns with the definition of Career Pathways in WIOA and represents a hallmark for innovative AEL instruction and Workforce Training for individuals who are Basic Skills Deficient.

Many states have well-recognized IET programs. Examples of these are the Washington state I-BEST service approach, Minnesota Fast Trac, and Accelerate Texas. To implement these approaches, AEL instructors and Workforce Training staff jointly design and deliver AEL Activities, Workforce Training, and Workforce Preparation Activities customized to support the academic and employment success of Basic Skills Deficient customers. AEL providers and Workforce Training partners deliver integrated programs of sufficient intensity and quality.

The Texas Higher Education Coordinating Board (THECB) and the Texas Workforce Commission (TWC) have developed agreed-upon tenets for implementing the various Career Pathway models for participants below the postsecondary level, including Accelerate Texas (TWC and THECB solicitations), Integrated Career Pathways (THECB solicitations), and IET (TWC solicitations). These tenets include:

- access to Workforce Training for underprepared AEL customers while maintaining program rigor;
- AEL support integrated and contextualized with Workforce Training and aligned with common learning objectives and integrated activities;
- acceleration of the AEL customer's educational and career advancement, to the extent practicable, through the organization of AEL Activities, Workforce Preparation Activities, Workforce Training, and other services to meet the particular needs of an individual;
- completion of a Recognized Postsecondary Credential integrated in an in-demand or targeted occupation, to assist an individual in entering in or advancing within a specific in-demand or targeted occupation or occupational cluster, as determined by the Board, and aligned with local and regional economic and labor market analysis;
- an overall scope of services that meet the particular needs of adults, such as accommodating schedules with multiple entry and exit points, flexible and

- non-semester-based scheduling, alternative class times and locations, and the innovative use of technology; and
- Workforce Preparation Activities and academic and support services through the Boards, workforce intermediaries, sector partners, employers, institutions of higher education, and other entities or other leveraged resources.

Accelerating participant completion and placement into in-demand and targeted occupations is a critical objective of IET models. Research clarifies the weaknesses of traditional sequential models, which require participants to progress through a sequence of remedial courses to achieve college readiness. To accelerate progress and reduce attrition, IET models admit customers below standardized academic admission levels, or without high school equivalency, into college-level Workforce Training Intensive and contextualized AEL Activities, along with other Transitions and Workforce Preparation Activities, support student success to credential completion and employment.

WIOA authorizes using AEL funds to implement IET models, including Workforce Training and Workforce Preparation Activities, creating new options that AEL grantees can implement to meet Career Pathways objectives and TWC’s priorities for AEL. IET is also a mandatory component of Integrated English Literacy and Civics Education (Integrated EL Civics) program services required in Year 3 AEL contracts under TWC Request for Proposals 320-14-10. Guidance on Integrated EL Civics can be found in AEL Letter 04-16, issued September 15, 2016, and entitled “Implementing Integrated Education and Training English Literacy and Civics Education.”

**PROCEDURES:**

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

**Adult Education and Literacy Activities (AEL Activities)** in IET means programs and activities in the content domains of reading, writing, English as a Second Language, and mathematics.

**Basic Skills Deficient** means an individual who is unable to:

- read, write, or speak in English at a level necessary to function on the job, in the individual’s family, or in society; or
- compute or solve problems.

**Career Pathways** means a combination of rigorous and high-quality education, training, and other services that:

- align with the skill needs of industries in the economy of the state or regional economy involved;
- prepare 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;

- include counseling to support an individual in achieving the individual's education and career goals;
- include, as appropriate, education offered concurrently with and in the same context as Workforce Preparation Activities and Training for a specific occupation or occupational cluster;
- organize 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;
- enable an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- help an individual enter or advance within a specific occupation or occupational cluster.

**Coenrollment** means enrollment of an eligible individual in two or more of the six core programs administered under WIOA, including the Adult, Dislocated Worker, and Youth programs (WIOA Title I); the Adult Education and Family Literacy Act (WIOA Title II); the Employment Service program under the Wagner-Peyser Act of 1933 (WIOA Title III); and the Vocational Rehabilitation program, authorized under Title I of the Rehabilitation Act of 1973. In practice, the term often has a wider meaning, such as coenrollment between AEL programs and Workforce Training, regardless of enrollment in a particular WIOA program.

**College Knowledge** means the body of knowledge that includes, but is not limited to, the purposes, types, costs, and admissions requirements of college, as well as the academic and behavioral expectations of the college culture, which is necessary for both gaining admission to and navigating within postsecondary education and training systems. Competencies may include, but are not limited to, understanding college admissions, application requirements, and financial aid processes; college readiness testing and placement requirements; budget planning; non-credit, credit, and developmental education options; expectations around persistence, attendance, and communication with college faculty and support staff; adding and dropping courses; and the culture, challenge, and rigor of postsecondary education and training, in particular, how it differentiates from high school.

**Core Components of an IET (IET Components)** means the three required instructional and service activities of an IET. These include:

- AEL Activities contextualized for Workforce Trainings;
- Workforce Preparation Activities; and
- Workforce Training for a specific in-demand or targeted occupation or occupational cluster, as determined by the Board.

**Digital Literacy** means technology skills that enable users to find, evaluate, organize, create, and communicate information.

**In-Demand or Targeted** means:

- an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the state, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or
- an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector that will have a significant impact on the state, regional, or local economy, as appropriate.

**Integrated Education and Training (IET)** means an overall scope of services designed for a specific occupation or occupational cluster for the purpose of educational and career advancement, which includes the three IET Components delivered through Integrated Services—ensuring that participants gain the skills needed to succeed in the Workforce Training program by attaining a Recognized Postsecondary Credential, entering or advancing in employment, or advancing in postsecondary education and training.

**Integrated Services (Integrated)** means IET Components are provided concurrently and contextually such that the IET Components:

- are provided simultaneously at points within the overall scope of the program;
- are of sufficient intensity and quality and based on the most rigorous research available to support the advancement of education and career development;
- use occupationally relevant instructional materials;
- have a single set of learning objectives that identify specific competencies across the IET Components, which may include established learning objectives and/or trade-related benchmarks or competencies for a particular in-demand or targeted occupation or occupational cluster required for attaining a Recognized Postsecondary Credential; and
- are organized to function cooperatively.

**Recognized Postsecondary Credential (Credential) for IET** means:

- an industry-recognized occupational certificate or certification, such as the Texas Nurse Aide certification (Texas Department of Aging and Disability Services (DADS)), Certified Logistics Associate (Manufacturing Skill Standards Council), Level I Entry Welder (American Welding Society), A+, Network+, Server+, Security+ (Computing Technology Industry Association), Microsoft Office Specialist (Microsoft), and Heavy Equipment Operator (National Center for Construction Education and Research);
- certificate of completion of an apprenticeship;
- occupational licensure recognized by the state or federal government, such as Licensed Vocational Nurse (Texas Board of Nursing); or
- other recognized occupational certificates or certifications (e.g., Occupational Skills Awards, Level I or Level II certificates common in Texas community and technical colleges).

Although short-term certificates or certifications such as Occupational Safety and Health Administration (OSHA) 10-Hour Card or ServSafe (National Restaurant Association Educational Foundation) are industry-recognized, preparation for these Credentials is very short and does not, typically, lead to employment or career advancement without additional Workforce Training. Incorporating preparation for the OSHA 10-Hour Card in a Level I certificate in apartment and building maintenance or the ServSafe certification in a hospitality and food management program would ensure that IET Components were of sufficient quality and intensity to be responsive to the students, employers, and local economies.

Certificates of completion awarded for attendance or meeting satisfactory completion criteria are not credentials. For example, a certificate of completion awarded by an educational institution for a Microsoft Office preparation course is not a credential unless the course curriculum includes the competencies needed for participants to take the Microsoft Office Specialist Credential.

**Transitions to Postsecondary Education or Training (Transitions)** means preparatory course models designed with the objective of increasing the transition success of participants at National Reporting System Levels 4–6 who are enrolling in initial postsecondary education and training courses. In practice, these models include bridge or summer bridge programs, college onboarding or on-ramp courses, and some student development courses characterized by intensive, targeted remediation in core content areas, as well as College Knowledge to support the skills and understanding needed for both gaining admission to and navigating within postsecondary education and training systems. Transitions courses are often scheduled in the weeks or months preceding established enrollment dates (e.g., in late July and August for fall enrollment, October through December for spring enrollment, or late spring for summer enrollment). Transitions courses may include Workforce Preparation Activities.

**Workforce Preparation Activities** include activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, Digital Literacy skills, and self-management skills, including competencies in the following:

- Using resources;
- Using information;
- Working with others;
- Understanding systems;
- Skills necessary for successful transition into and completion of postsecondary education, training, or employment; and
- Other employability skills that increase an individual's preparation for the workforce.

**Workforce Training** means the following:

1. Occupational skills training, including training for nontraditional employment;
2. On-the-job training;
3. Incumbent worker training;
4. Programs that combine workplace training with related instruction, which may include cooperative education programs;
5. Training programs operated by the private sector;
6. Skills upgrading and retraining;
7. Entrepreneurial training;
8. Job readiness training provided in combination with services described in 1 through 7;
9. AEL Activities, including activities of English as a Second Language and IET programs, provided concurrently or in combination with services described in 1 through 7; and
10. Customized training designed to meet the specific requirements of an employer or group of employers, conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

For more information and further definition of Workforce Training, see TWC's WIOA Guidelines for Adults, Dislocated Workers, and Youth at <http://twc.state.tx.us/partners/workforce-innovation-opportunity-act-wioa>.

**NLF**: Funding IET: AEL grantees must be aware that AEL funding must be expended to support the IET service approach that leads to employment in or advancement within a specific in-demand or targeted occupation or occupational cluster, as determined by the Board, and aligned with local and regional economic and labor market analysis.

**NLF**: Grantees must ensure that the IET program supports educational and career advancement by ensuring the curriculum is aligned with the Texas AEL Content Standards and is part of a Career Pathway.

**NLF**: Grantees must ensure that the IET program results in one or more Recognized Postsecondary Credentials. In certain Workforce Training options, such as entrepreneurial training, on-the-job training, and workplace training, a Recognized Postsecondary Credential may not be available or does not exist. In these unique circumstances, AEL grantees must document how the Workforce Training leads to career advancement.

**LF**: AEL grantees may coenroll participants in IET services funded from non-AEL funds or use Integrated EL Civics (WIOA §243) funds to provide IET.

**NLF**: Submission of IET Plans: AEL grantees must be aware that they must submit IET programs, including Integrated EL Civics programs further described in AEL Letter 04-16, to TWC through the Career Pathways Implementation Plan portal at <http://www-tcall.tamu.edu/twcael/grantees.htm>.

**LF**: Integrated Services may be delivered in multiple programmatic arrangements. TWC provides programs flexibility in IET delivery designs based on these elements, as long as the IET meets the programmatic requirements outlined in this AEL Letter; Integrated EL Civics programs must also meet the programmatic requirements outlined in AEL Letter 04-16.

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

**LF**: AEL grantees may fund Workforce Training out of all funding sources subject to compliance with applicable eligibility guidelines.

**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 (CDER) system.

**NLF**: AEL grantees must report IET activities, using appropriate activity codes, in Texas Educating Adults Management System (TEAMS).

**INQUIRIES:**

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

**RESCISSIONS:**

AEL Letter 02-16

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**REFERENCES:**

Workforce Innovation and Opportunity Act of 2014  
Final Rule, Programs and Activities Authorized by the Adult Education and Family Literacy Act (Title II of the Workforce Innovation and Opportunity Act)  
AEL Letter 04-16, issued September 15, 2016, and entitled “Implementing Integrated Education and Training English Literacy and Civics Education”  
Texas Workforce Commission Requests for Proposals 320-14-10

**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.”