

1 **TEXAS WORKFORCE COMMISSION**
2 **Adult Education and Literacy Letter**
3

ID/No:	AEL 01-17, Change 1
Date:	July 21, 2021
Keyword:	AEL; Fiscal Administration; WIOA
Effective:	Immediately

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5 **To:** Adult Education and Literacy Grant Recipients
6 Local Workforce Development Board Executive Directors
7 Commission Executive Offices
8 Integrated Service Area Managers
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11 **From:** Courtney Arbour, Director, Workforce Development Division
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13 **Subject:** **Implementing Programs, Activities, and Services for English**
14 **Language Learners—Update**
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18 **PURPOSE:**

19 The purpose of this AEL Letter is to provide Adult Education and Literacy (AEL)
20 grantees¹ with updated information, guidance, and capacity-building support
21 related to implementing programs, activities, and services for English language
22 learners (ELLs). Specifically, this updated AEL Letter adds a requirement that all
23 English as a Second Language (ESL) services and curricula include a civics
24 component beginning July 1, 2021.
25

26 **RESCISSIONS:**

27 AEL 01-17
28

29 **BACKGROUND:**

30 Workforce Innovation and Opportunity Act (WIOA) Title II, the Adult Education
31 and Family Literacy Act (AEFLA), expands and clarifies the variety of programs,
32 activities, and services available to ELLs. AEFLA includes four English as a
33 Second Language (ESL) program requirements and provides the flexibility
34 necessary for ESL programs to support ELL attainment of secondary completion
35 and transition into postsecondary education, training, or employment, including

¹ For the purposes of this AEL Letter, AEL grantees are entities that receive AEL funds through the Texas Workforce Commission (TWC).

1 through career pathways. These requirements expand the ESL program from its
2 traditional focus on developing basic communication skills to a program that
3 maintains these aspects but intensifies requirements for increased rigor to support
4 credential attainment and employment outcomes. The expanded program
5 objectives are supported by more rigorous ESL content standards and provisions
6 for educational and career counseling services and align with WIOA
7 modifications to the Integrated English Literacy and Civics (Integrated EL Civics)
8 program.

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10 To provide added flexibility in accomplishing the revised objectives and to
11 support Texas' large Spanish-speaking population, state law and TWC rule
12 support bilingual instruction and Spanish high school equivalency instruction.

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14 The following provides background on the requirements for ELL programs.

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16 **ESL Program Objectives**—AEFLA §203(6) includes a statutory requirement
17 that ESL programs under the act be designed to help ELLs achieve competence in
18 reading, writing, speaking, and comprehension of English. In addition to these
19 competencies, the AEFLA statement of purpose for services to immigrants and
20 other ELLs includes instruction in mathematics. The federal English Language
21 Proficiency Standards for Adult Education (ELP Standards) emphasize these
22 requirements through skills development well beyond basic life skills and outline
23 the specific language and content skills needed to promote college and career
24 readiness for ELLs at all levels.

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26 AEFLA also clarifies a requirement that the instructional program lead to the
27 attainment of a secondary school diploma or its recognized equivalent and
28 transition into postsecondary education and training or employment. While these
29 outcomes might not be realized initially by students at lower levels, the full
30 instructional program across ESL levels is required to support and provide an
31 interconnected sequence toward these outcomes and be reflected in program
32 objectives, curricula, and services. Starting at low levels, programs should begin
33 to include career-directed provisions, such as contextualizing curricula around
34 high-demand job clusters in the local workforce development area, integrating
35 Workforce Preparation Activities² and supporting career awareness, planning, and
36 employment services through Local Workforce Development Board (Board)
37 services.

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39 Recognizing that capacity building is necessary to support expanded service
40 options and their associated performance accountability requirements for ESL,
41 TWC has undertaken multiple efforts to support grantee implementation of these
42 requirements, including the revisions of the Texas content standards for AEL and
43 associated curriculum development and professional development.

² 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.

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ESL Content Standards—The Texas AEL Content Standards for English language arts and literacy, mathematics, and ESL were updated and aligned with academic and college readiness standards, as well as with federal ELP Standards, to provide a resource for developing curricula, instructional strategies, professional development, and enhanced program designs. Beginning in Program Year 2021–2022 (PY’21–’22), and as outlined in this letter; in AEL Letter 07-17, Change 1, titled “Required Syllabus Design for Adult Education and Literacy Instruction—*Update*”; and in AEL Letter 04-16, Change 2, titled “Implementing Integrated Education and Training English Literacy and Civics Education—*Update*,” TWC requires a civics component in all AEFLA-funded ESL services that aligns with the civics standards in the [Texas AEL Content Standards v. 3](#) (content standards).

Educational and Career Counseling Services—WIOA provides grantees flexibility to support students seeking to attain a secondary credential and transition into postsecondary education, training, or employment by offering educational and career counseling services. WIOA Title II educational and career counseling services align with the WIOA Title I career services. These services include referrals to and coordination of activities with other programs and services, development of employment and training plans, career counseling, mentoring, and comprehensive and specialized assessments of students’ skill levels, aptitudes, abilities, and service needs, including:

- diagnostic testing and use of other assessment tools; and
- in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.

In support of WIOA’s vision for integrated services, grantees should align, when appropriate, Title I career services and Title II educational and career counseling services to support customer transition into postsecondary education or training or employment. When possible, grantees should also document and build on ELLs’ previous education, credentials, experience, and skills, including education and employment experience from native countries. WIOA Title II specifically underscores the importance of serving professionals with degrees and credentials in their native countries.

Internationally trained ELL professionals in Integrated EL Civics can benefit from educational and career counseling services that include comprehensive and specialized assessments, such as credential evaluation and authentication of international degrees and professional credentials and licenses. Such services support an articulated identification of employment assets and barriers and the development of appropriate employment goals, and, with related counseling support, can accelerate educational and career advancement. Credential validation can facilitate the attainment of US employer–recognized credentials by documenting progress within a career pathway in specific occupations or occupational clusters. Credential validation also can leverage the technical skills

1 and bilingual and bicultural assets of ELLs. Services also can include testing to
2 determine readiness for postsecondary transition as part of a student’s career
3 pathway.
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5 **Bilingual Instruction and Spanish High School Equivalency**—Bilingual
6 education can often meet the needs of customers and facilitate English language
7 acquisition by providing opportunities for low-level learners to develop their
8 skills in their native languages, which better supports cognitive development and
9 the essential components of literacy.

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11 Native language and literacy development allows students to transfer a framework
12 of knowledge and skills related to literacy in their native language to learning
13 English. For example, foundational literacy concepts and principles learned in
14 Spanish do not have to be retaught in English. Skills can be transferred, applied,
15 modified, and modeled to support English language development.

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17 Spanish speakers with high native language literacy levels can benefit from
18 bilingual education. Programs can offer instruction that has separate
19 components—one for ESL and another to prepare for high school equivalency
20 tests offered in Spanish. Assessments for the Texas Certificate of High School
21 Equivalency (TxCHSE) are available in English, Spanish, or a combination of the
22 two languages across test subjects. TWC reports TxCHSE completions in both
23 languages in state and federal reports. Similarly, research on bilingual
24 instructional models for workforce education have concluded that combining a
25 contextualized ESL program with Workforce Training content delivered in the
26 native language can expedite the development of technical skills and considerably
27 accelerate learning and credential attainment.
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29 **Family Literacy**—While the increased emphasis on employment, secondary
30 credential attainment, postsecondary education, and training transition present
31 new objectives for local ESL program models, these objectives do not contradict
32 or supplant established ESL program objectives related to family literacy.
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34 TWC acknowledges that students participate in ESL for a variety of reasons, not
35 all of which pertain to credential attainment, transition to postsecondary education
36 and training, or employment. TWC policy aims to incrementally increase the
37 proportion of students who exit AEL work-ready, enrolled, or coenrolled in
38 Workforce Training. However, this does not preclude programs from serving
39 eligible individuals whose primary motivation for participation is to become full
40 partners in the educational development of their children and improve the
41 economic opportunities for their families. Providing services to support adults to
42 be the primary teachers for their children and full partners in their children’s
43 education is an important component of the AEL system and is required of
44 grantees funded under TWC RFP 320-18-01. These services benefit parents, their
45 children, and their families as a whole. Parents who enter into and complete

1 career training and higher education greatly increase their potential earnings and
2 serve as important role models for their children.

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4 **PROCEDURES:**

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

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

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

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19 **Bilingual Instruction**—Approaches in the AEL or Workforce Training
20 classroom that use the native languages of ELLs as a support for content
21 instruction. ESL programs that incorporate bilingual instruction must:

- 22 • ensure that English language acquisition is the primary objective of instruction
23 and customers are assessed appropriately as ELLs according to the Texas
24 AEL Testing Guide (previously known as the Texas AEL Assessment Guide);
- 25 • use a curriculum based on relevant research for dual-language or bilingual
26 instruction, including models for Workforce Training;
- 27 • be designed to consider customers’ learning experiences and incorporate
28 cultural aspects of customers’ backgrounds;
- 29 • be used only when all participants share the same language; and
- 30 • support state and programmatic performance objectives.

31
32 **Career Pathway**—A combination of rigorous and high-quality education,
33 training, and other services that:

- 34 • align with the skills needs of industries in the state or regional economy
35 involved;
- 36 • prepare an individual to be successful in any of a full range of secondary or
37 postsecondary education options, including apprenticeships registered under
38 the Act of August 16, 1937 (commonly known as the National Apprenticeship
39 Act or the Fitzgerald Act);
- 40 • include counseling to support an individual in achieving the individual’s
41 education and career goals;
- 42 • include, as appropriate, education offered concurrently with and in the same
43 context as Workforce Preparation Activities and Workforce Training for a
44 specific occupation or occupational cluster;

- are organized 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 into or advance within a specific occupation or occupational cluster.

Credential Evaluation, Authentication, and Verification Services—

Professional review and expert assistance in the interpretation of international academic credentials in terms of their degree, credential, and license equivalents in the United States, to support internationally trained ELL professionals participating in career pathways.

Note: AEL grantees may consider credential evaluation, authentication, and verification services as part of educational and career counseling on a case-by-case basis according to an ELL’s individual needs, as well as the extent to which the associated employment, reemployment, or higher education activities use Title II funds. Providing such services across the board for all ELLs is not consistent with program intent.

Educational and Career Counseling—Services that enable an individual to access additional assistance, including counseling, to support the individual in achieving education and career goals, such as attaining a secondary school diploma or its equivalent and transitioning into postsecondary education or employment. Career pathway navigators contribute significantly to these objectives by supporting participant access to Board services, facilitating enrollment and retention in community and technical colleges, and identifying employment opportunities with local employers in high-demand occupations.

English As a Second Language (ESL)—An instructional program designed to help eligible ELLs achieve competence in reading, writing, speaking, and comprehending English. The ESL program also may include instruction in mathematics. Its design must consider customers’ learning experiences, incorporate cultural aspects of customers’ backgrounds, lead to attainment of a secondary school diploma or its recognized equivalent, and transition customers into postsecondary education and training or employment.

Note: Federal guidance and WIOA refer to ESL as English Language Acquisition (ELA), while the National Reporting System for AEFLA reporting guidelines retains the term “ESL.” TWC will continue to use “ESL” to reference services to ELLs in policy, guidance, and communications to avoid confusion with English Language Arts, which is referred to as “ELA” in state documents and policies.

1 **English Language Learner (ELL)**—An eligible individual who has limited
2 ability in reading, writing, speaking, or comprehending English and whose native
3 language is a language other than English or who lives in a family or community
4 environment where a language other than English is the dominant language.
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6 **English Literacy and Civics Education Services (EL Civics)**—Education
7 services provided to adult ELLs, including professionals with degrees or
8 credentials in their native countries, to enable them to achieve competency in
9 English and acquire the basic and more advanced skills needed to function
10 effectively as parents, workers, and citizens in the United States. EL Civics
11 services must include instruction in literacy, ESL, and the rights and
12 responsibilities of citizenship and civic participation and may include Workforce
13 Training.
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15 **Internationally Trained ELL Professional**—An ELL who is a professional with
16 a degree or credential from his or her native country.
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18 **Integrated EL Civics**—A program funded under WIOA §243 for adult ELLs,
19 including professionals with degrees and credentials in their native countries.
20 WIOA §243 Integrated EL Civics funds require that the program service approach
21 include EL Civics services in combination with Integrated Education and Training
22 (IET) for participants for whom IET services are appropriate. Additionally, the
23 Integrated EL Civics program must:

- 24 • be designed to prepare adult ELLs for, and place them in, unsubsidized
25 employment in existing and emerging in-demand industry sectors or target
26 occupations that lead to economic self-sufficiency; and
- 27 • integrate with Board and Workforce Solutions Office functions to carry out
28 the program’s activities.
29

30 **Individual Training, Education, and Career Plan (ITEC Plan)**—A plan for
31 each student participant, as required under AEL grantee contract TWC RFP 320-
32 18-01. The ITEC Plan documents actions that a student must take to meet
33 educational and career goals and is designed to promote a discussion and set forth
34 a strategy. The plan delineates short- and long-term goals with the necessary
35 implementation steps.
36

37 **Workforce Preparation Activities**—Activities, programs, or services designed
38 to help an individual acquire a combination of basic academic skills, critical
39 thinking skills, digital literacy skills, and self-management skills, including
40 competencies in the following:

- 41 • Using resources and information
- 42 • Working with others
- 43 • Understanding systems
- 44 • Developing or enhancing skills necessary for successful transition into and
45 completion of postsecondary education, training, or employment

- Developing or enhancing other employability skills that increase an individual's preparation for the workforce

NLF: ESL and Civics Content Standards—AEL grantees must ensure that ESL services and curricula, including Integrated EL Civics and EL Civics programs, are aligned to the content standards and make necessary modifications to ESL staff qualifications, instructional strategies, professional development, and other affected areas to ensure compliance. Beginning in PY'21-'22, all ESL services and curricula must, at a minimum, include a civics component aligned with the civics standards outlined in the content standards.

NLF: AEL grantees must adhere to policy in AEL Letter 04-16, Change 2, related to serving participants in EL Civics and Integrated EL Civics programs.

NLF: Expanded Program Objectives—AEL grantees must ensure that ESL services lead to attainment of a secondary school diploma or the TxCHSE and transition into postsecondary education, training, or employment. To meet this requirement, a program of instruction must:

- have implemented the content standards, as evidenced by the use of curricula, lesson plans, and/or instructional materials that are aligned with the content standards, in addition to the civics standards; and
- offer educational and career counseling services that assist an eligible individual to transition into postsecondary education or employment; or
- be part of a career pathway, including, but not limited to, Integrated EL Civics and Integrated Education and Training.

NLF: AEL grantees must ensure that ESL services provide course and curricula options to help ELLs achieve competence in reading, writing, speaking, and comprehending English; beginning July 1, 2021, all ESL services and curricula must include civics components that align with the AEL content standards' civics standards.

LF: AEL grantees may provide instruction in mathematics within ESL services.

NLF: AEL grantees must ensure that ESL instructional programs and services provide an interconnected sequence across ESL levels and that the sequence leads to:

- the attainment of a secondary school diploma or its recognized equivalent; and
- transition into postsecondary education or training; or
- employment.

These outcomes must be reflected in program objectives, curricula, and services.

LF: Educational and Career Counseling Services—AEL grantees may offer educational and career counseling services, including the development and execution of a career pathway that builds on a customer's education, experience, and skills to enable ELLs to transition to further education or find employment.

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Educational and career counseling services may include, but are not limited to, the following:

- Services delivered by AEL career pathways navigators that include workforce case management in conjunction with college and career advising
- Concurrent or coenrollment in programs or activities provided through Workforce Solutions Offices, including Title I or other core programs, as appropriate, that provide career services when consistent with an individual’s employment, reemployment, or college entry needs and abilities
- Comprehensive and specialized assessments of skill levels and service needs, including the provision of credential evaluation, authentication, and verification services for international degrees, professional credentials, and licenses, to support individuals participating in Integrated EL Civics
- Workforce Preparation Activities.

NLF: AEL grantees must consider the provision of credential evaluation, authentication, and verification services on a case-by-case basis as well as document educational and career counseling services within customers’ ITEC Plans.

LF: **Bilingual Instruction and Spanish High School Equivalency**—AEL grantees may provide bilingual instruction within ESL programs, including instruction to prepare for the TxCHSE, and bilingual Workforce Training appropriate for an individual’s optimum development.

Effective bilingual instruction requires that students share a common native language; thus, instructors teaching classes with multiple languages represented are encouraged to refrain from using bilingual methods or to do so only with subsets of students who share a common native language.

NLF: AEL grantees must not offer Spanish TxCHSE preparation unless the class is integrated with an ESL class and students are assessed as ELLs according to the Texas AEL Testing Guide, previously known as the Texas AEL Assessment Guide.

NLF: **Family Literacy**—AEL grantees must provide services to eligible individuals whose primary motivation for participation is to become full partners in the educational development of their children. Grantees must support these individuals in being the primary teachers for their children and full partners in their children’s education.

LF: **Family Literacy Standards**—AEL grantees may align family literacy curriculum to the family literacy standards outlined in the content standards.

INQUIRIES:
Send inquiries regarding this AEL Letter to aelpolicy.clarifications@twc.state.tx.us.

1 **REFERENCES:**

- 2 Workforce Innovation and Opportunity Act of 2014
3 US Department of Education, Office of Career, Technical and Adult Education,
4 *Adult English Literacy Proficiency Standards for Adult Education*,
5 Washington, DC, 2016
6 [US Department of Labor Training and Employment Guidance Letter WIOA No.](#)
7 [3-15](#)
8 [Implementation Guidelines: Measures and Methods for the National Reporting](#)
9 [System for Adult Education, February 2016](#)
10 [Texas Certificate of High School Equivalency \(TxCHSE\)](#)
11 [Texas AEL Content Standards v. 3](#)
12 AEL Letter 02-16, Change 1, issued October 13, 2016, and titled “Implementing
13 the Integrated Education and Training Service Approach,” and any subsequent
14 issuances
15 AEL Letter 04-16, issued September 15, 2016, and titled “Implementing
16 Integrated Education and Training English Literacy and Civics Education,” and
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23 Huerta-Macias, Ana, and Kerrie Kephart. “Reflections on Native Language Use
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