

31 July 2013

The Honorable Tom Harkin
Chairman
Committee on Health, Education
Labor and Pensions
U.S. Senate
Washington, DC 20510

The Honorable Lamar Alexander
Ranking Member
Committee on Health, Education
Labor and Pensions
U.S. Senate
Washington, DC 20510

The Honorable Robert Casey
Chairman
Subcommittee on Employment
and Workplace Safety
U.S. Senate
Washington, DC 20510

The Honorable Johnny Isakson
Ranking Member
Subcommittee on Employment
and Workplace Safety
U.S. Senate
Washington, DC 20510

Dear Senators Harkin, Alexander, Casey, and Isakson:

Thank you for continued leadership and commitment to providing a high quality education to learners of all ages in the United States. On behalf of TESOL International Association (TESOL), a global education association representing approximately 13,000 English language educators in 150 countries, I am writing to provide you TESOL's comments on S. 1356, *the Workforce Investment Act of 2013* (WIA).

Although TESOL's members work with English language learners of all ages, a large percentage of the association's members in the United States work with adult English language learners, and thus are impacted by WIA. The Adult Education and Family Literacy Act (AEFLA), currently authorized as Title II of the WIA, is the primary source for federal funding for adult education and English as a second language (ESL) instruction to adults in the United States. Since the time WIA was initially enacted, the United States has seen significant demographic shifts in its population, not the least of which has been tremendous growth of the English language learner population. This growth has had a great impact not only on the adult education system in the United States, but on the labor force as well. Unfortunately, as WIA has not undergone any significant revision since its enactment, the law is now in many ways out of date, mostly in regards to the developments and advancements in the field of adult education, and in reflecting the changing demographics of the adult learner population.

TESOL is very pleased to see in S. 1356 many changes that reflect this new reality, including many of the proposed changes to WIA that TESOL and others in the adult education community have advocated. Specifically, the association strongly supports the following elements S. 1356:

- Greater alignment between workforce development and adult education, including matching language between Titles I, II, and III;
- Inclusion of English as a second language (ESL) services as core purpose of Title III, and greater support for ESL and English language learners throughout;

- Codification of the English language and civics education (EL/Civics) grant program;
- Required state professional development systems; and
- Support for postsecondary education attainment as well as career pathway programs.

In order to make S. 1356 an even stronger bill, outlined below are TESOL’s recommendations and priorities for WIA reauthorization.

1. Include the population of adult English language learners in the state grant formula for adult education.

Recommendation

Page 581, Sec. 311 (d) strike lines 4-6 and replace with the following:

(3) either:

(i) does not have secondary school diploma or its recognized equivalent, and is not enrolled in secondary school; or

(ii) is an English language learner with a secondary school diploma or its recognized equivalent.

Justification

At present, the formula for Adult Basic Education and Literacy State Grants is based solely on the population of adults without a high school diploma or equivalent. However, the greater population of learners served in federally funded adult education programs are enrolled in ESL programs. According to the Office of Vocational and Adult Education (OVAE), federal grants under AEFLA supported only 2.6 million learners in program year 2004–2005, the last program-year data reported by OVAE. Of these, 39% percent were enrolled in adult basic education, 16% were enrolled in adult secondary education, and 44% were enrolled in English literacy programs.

While many English language learners in adult education do not have their high school diploma or equivalent, an increasing number of adult English language learners do, especially in major metropolitan areas. According to a June 2011 policy brief by the Brookings Institution¹, the share of working-age immigrants in the United States who have a bachelor’s degree has risen considerably since 1980, and now exceeds the share without a high school diploma. College-educated immigrants outnumber immigrants without high-school diplomas (or equivalent) by at least 25 percent in 44 of the 100 largest metropolitan areas in the United States.

2. Add “career advancement” to the definition of “English language acquisition”

Recommendation

Page 573, Section 303(6)(B)(ii) add “or career advancement after “employment”.

¹ Hall, M. Singer, A. De Jong, G. and Roempke Graefe, D. (2011) *The Geography of Immigrant Skills: Educational Profiles of Immigrant Areas*. Washington, DC. Brookings Institution. Brief.
http://www.brookings.edu/~media/Files/rc/papers/2011/06_immigrants_singer/06_immigrants_singer.pdf

Justification

While limited English proficiency does serve as a barrier to employment for many English language learners, it also serves as a significant barrier to career advancement for college-educated and highly skilled immigrants. According to an October 2008 report from the Migration Policy Institute², more than 1.3 million college-educated immigrants living in the United States are unemployed or underemployed in unskilled jobs because they are unable to make full use of their academic and professional credentials. Many of these college-educated immigrants lack the English language skills critical to obtaining jobs commensurate with their education and training.

According to a June 2011 policy brief by the Brookings Institute³, the share of working-age immigrants in the United States who have a bachelor's degree has risen considerably since 1980, and now exceeds the share without a high school diploma. College-educated immigrants outnumber immigrants without high-school diplomas (or equivalent) by at least 25 percent in 44 of the 100 largest metropolitan areas in the United States. Therefore, it is worth emphasizing the value of English for career advancement in this population of educated immigrants.

3. Emphasize All Literacy Levels in Title Purpose

Recommendation

Page 569, line 19, Section 302(1) by adding "at all literacy levels" after "adults" to now read:

"(1) assist adults *at all literacy levels* to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency;"

Justification:

TESOL is concerned that current performance systems and programming are not sensitive to the gains, goals and outcomes of adults at the lowest levels, which are often English language learners. An additional element in this Purpose area that embraces lowest level learners will counteract a programming pressure to teach only those who will show performance measure gains on the primary performance indicator measures listed in Title I(131)(b).

4. Revise Intensity and Quality

Recommendation

Page 600, Section 331(e) (4) (A) strike lines 12-14 and add "utilizing appropriate delivery approaches including group and individual instruction, technology-supported instruction, self-study, or a combination so that participants achieve substantial learning gains."

Justification

The draft Senate bill language leaves it up to the state to define both "sufficient quality" and "the most rigorous research available". Individual states are not in the best position to determine this and as history has demonstrated will interpret this language very differently from state to state thus further increasing

² Batalova, J. and Fix, M. *Uneven Progress: The Employment Pathways of Skilled Immigrants in the United States*. Washington, DC. Migration Policy Institute. <http://www.migrationpolicy.org/pubs/BrainWasteOct08.pdf>

³ Jong, G. F., Graefe, D. R., Hall, M., & Singer, A. (n.d.). *The Geography of Immigrant Skills: Educational Profiles of Metropolitan Areas*. Washington, DC. Brookings Institution. <http://www.brookings.edu/research/papers/2011/06/immigrants-singer>

the uneven quality of adult education across the nation. TESOL prefers the current language in the 1998 Workforce Investment Act Title II, Section 231, with the suggested modification.

5. Change state leadership to a minimum of 15%.

Recommendation

Page 546, line 22, Section 322(a)(2), strike “more” and insert “less” to read:

“shall use not ~~more~~ *less* than 15 percent of the grant funds to carry out State leadership activities under section 323.”

Justification

TESOL supports the position of the National Coalition for Literacy to increase the amount of state leadership funds from 12.5% to **a minimum** of 15% to improve teacher quality by providing more professional development, improving working conditions, professionalizing the workforce, and researching the intersection of these factors to determine what practitioners need to be effective.

A cap of 15% to fund Section 323, State Leadership Activities, is inadequate to meet the needs of the field of adult education. There are a host of eligible activities listed as required and permissible activities in the draft of Title III, yet this funding amount is insufficient to meet even the most cursory coverage of any of them. In addition, student outcomes – the goal of the Title – hinge upon the quality of instruction students receive. Improving the professionalization and knowledge of the teaching workforce should be a national priority.

Facts:

- ***Professional development, which is provided for under state leadership, is the primary mechanism for preparing adult educators with the knowledge and skills about instructional practices that spur student achievement.*** Research shows that most adult educators have limited formal education specifically related to teaching adults. Few states require an adult education teaching certification. Thus, practitioners rely on professional development to help them use data to improve student outcomes and pursue training specific to their instructional needs.
- ***Adult educators are being asked to do more and meet higher student outcomes.*** With the increased focus on teacher quality, career and college pathway services, the need to prepare adults to transition to postsecondary education and training, and integrating technology into teaching and learning, funding for high quality professional development should increase to meet the new demands on teachers.
- ***Participation by states in national activities require a substantial investment of professional development that state leadership dollars are stretched thin to provide.*** High-quality, national professional development activities are costly. States and programs must fund the training of the trainers, convene the practitioners and provide the materials, pay travel and release time to attend, including paying for substitutes and paid planning time to implement what participants have learned. Research shows that professional development leading to teacher change takes significant investment in time and long-term, job-embedded support to translate into improvement in practices.

6. Improve the Professional Quality of the Adult Education Workforce

Recommendation

Amend Section 323(a)(1) to include a new required activity establishing a **Career Advancement System for Adult Education Practitioners**, providing guidance to states for improving the professional quality of the adult education workforce.

“The establishment or operation of a Career Advancement System for Adult Education Practitioners to provide guidance for states to improve the professional quality of the adult education workforce, including one or more of the following activities:

- i. Ensuring participation in professional development that is responsive to practitioner and learner needs for adult basic education, adult ESOL, and adult secondary education practitioners that will help them be effective teachers, program administrators, tutors, learner leaders, counselors, and paraprofessionals.
- ii. Establishing pathways to careers for adult educators that are linked to compensation commensurate with experience and qualifications.
- iii. Providing paid professional development release time for practitioners and allowances for hiring substitute teachers, where applicable, to provide release time for practitioners to attend professional development.
- iv. Offering tuition stipends to attract college graduates who then get degrees in adult education and stay in the field for a period of 5 years.
- v. Offering grants to eligible providers with an ability to deliver new practitioner induction, mentoring, and coaching experiences.
- vi. Establishing career ladders for teachers who then become mentors of other teachers and who take leadership roles within the program to become master teachers.
- vii. Providing incentives for hiring full time instructors.

Recommendation

Add new language to section 343(c)(3)(F) carrying out rigorous research on the relationship between instructional quality, including education levels, certification status, and experience of instructors, teacher working conditions, and the performance outcomes of eligible providers consistent with section 131.

Justification

Closing the Achievement and Life Outcomes Gaps Through Teacher Quality

The 21st century adult educator needs to:

- Prepare adults to be digital age learners using existing and new technologies in creative ways.
- Prepare adults with the basic adult literacy and critical thinking skills they need to be competitive in the 21st century workforce.
- Teach adults with learning and other disabilities to close the life outcomes gap.

- Prepare adults to transition into postsecondary and vocational credit-bearing classes.
- Instruct a linguistically diverse classroom made up of learners at all different levels of language proficiency to improve their language proficiency.
- Increase political literacy and civic participation among our nation's adults.
- Strengthen programs to be scalable and flexible to meet new demands in communities.

A new type of high quality adult educator is in demand.

However, very few 21st century educators can make a commitment for any length of time in adult education. They lack opportunities for stable, full-time employment. Only one in five adult education teachers is full time; 82% of teachers are part-time; thousands are volunteers; most are funded on year-to-year grant programs. Stable job status that facilitates a dedicated, professional workforce is critical to raising student achievement outcomes. Research in higher education found that adjunct faculty produced lower student achievement outcomes than full time faculty.⁴ Career ladders are virtually non-existent in adult education. Many practitioners are not paid to attend professional development or provided the opportunity to grow professionally in order to meet these demands upon them.

Developing a qualified teaching workforce is vital. Higher quality teachers make for a higher quality programs with better results for students. If our nation wants this teaching workforce to produce high student outcomes for adult learners, then first we must have the professional working conditions that enable it.

Conditions Enable Quality

We need to grow the next generation of adult educators. Smith & Hofer (2003)⁵ found that most adult basic education teachers do not have formal training in teaching adults (even if they have been K-12 teachers). Therefore, all new adult education teachers, whether they have previously taught in K-12 before, need training in the basics of teaching adults and an orientation to the field of adult education. They need pre-service training and credentialing, new teacher orientation, mentoring, and coaching in tandem with pay commensurate and scalable to their qualifications and experience.

Provide Equity

The Higher Education Opportunity Act (P.L. 110 – 315) Reauthorization of 2008 sets new precedent in teacher quality by:

- Providing pay commensurate to qualifications and experience;
- Creating a trained and highly qualified K-12 teacher workforce; and

⁴ <http://gseacademic.harvard.edu/~longbr/Bettinger%20Long%20-%20Impact%20of%20Adjunct%20Instructors%209-08.pdf>
http://www.ilr.cornell.edu/cheri/conferences/upload/2005/Bettinger_Long_adjunct_cheri.pdf

⁵ Smith, C. & Hofer, J. (2003). *The Characteristics and Concerns of Adult Basic Education Teachers*. Report #26. Boston, MA: National Center for the Study of Adult Learning and Literacy. Brief:
<http://www.ncsall.net/fileadmin/resources/research/brief26.pdf>

- Requiring quality and accountability assurances for teacher preparation programs.

Additionally, the HEA provides grants to institutions of higher education partnerships to improve the quality of pre-service and new teachers in K-12 system. This is one of many examples this title offers to improve the quality of the K-12 teaching workforce. What is considered best practice for K-12 educators is worth applying to the field of adult educators. Provide equity for adult educators. Create conditions that enable quality.

7. Include Performance Measures for Educational Gains

Recommendation

Page 585, line 18, Section 312, add “primary” after “the” to read:

“Programs and activities authorized in this title are subject to the *primary* performance accountability provisions described in section 131.”

Page 585, Section 312, add after line 19, new 312 (b):

“Programs and activities authorized in this Title are subject to additional performance accountability measures. These additional indicators of performance shall include measurable improvements in literacy skills in reading, writing, and speaking the English language, numeracy, English language acquisition, and other literacy skills.”

Justification:

Basic English language literacy skills are vital in order for many program participants to access the career pathway or integrated education and training programs that will lead them to postsecondary education or increased employment opportunities. This is especially true for adult English language learners. However, unless there are performance measures related to educational gains for Title III programs, an adult education program's performance in helping their students acquire greater literacy skills will no longer be required.

TESOL strongly recommends, therefore, that the final bill include educational gains as a primary performance measure so that the performance of Title III programs can be accurately evaluated. Otherwise this may lead to a substantial disincentive for programs funded through WIA to serve adults with low literacy skills and levels of English proficiency, thwarting the intent of Title III.

8. Review the performance accountability system.

Recommendation

Page 608, Section 342(b) add:

(4) Required activity:

The National Academy of Sciences shall convene an independent panel of researchers, policymakers, and practitioners with relevant experience from among adult education, postsecondary education, and workforce development fields to review the effectiveness of the performance accountability system in

incentivizing programs to document adult learning and continuous program improvement, especially toward more effective practices for helping students a) most in need of literacy services (including those with minimal literacy skills) and b) achieve their college and career readiness goals quickly.

Justification:

TESOL supports the position of the National Coalition for Literacy for an objective review of the National Reporting System and the assessments that are approved for its data collection. Specifically, the National Coalition for Literacy has called for funds to review, and update, the National Reporting System, to ensure that required outcomes measures are appropriate for all levels of adult education students. This recommendation underscores a concern by TESOL that current assessments and programming are not sensitive to the gains, goals and outcomes of adults at the lowest levels, with disabilities, or language differences.

TESOL very much appreciates the opportunity to provide its comments on this discussion draft for reauthorization of WIA, and looks forward to working with you and the Congress on this important legislation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rosa Aronson', written over a horizontal line.

Rosa Aronson, PhD, CAE
Executive Director

CC: Deena Boraie, President
Yilin Sun, President-elect
Suzanne Panferov, Past President