



June 15, 2015

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Assistant Secretary for Employment and Training
U.S. Department of Labor
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Washington, DC 20210

Lekesha Campbell
Office of Vocational and Adult Education
U.S. Department of Education
400 Maryland Avenue SW., Room 11-008
Potomac Center Plaza (PCP)
Washington, DC 20202

Dear Ms. Wu and Ms. Campbell,

Thank you for the opportunity to present comments regarding the Workforce Innovation and Opportunity Act (WIOA). Single Stop supports the Administration, the Department of Labor, and the Department of Education as you focus your workforce and adult education priorities to ensure that adults, youth, dislocated workers, and adult education students are equipped to develop the skills they need to obtain and retain employment. Single Stop respectfully submits these recommendations regarding Notice of Proposed Rulemaking (NPRM) RIN 1205-AB73 (Docket No. ETA-2015-0001), “Workforce Innovation and Opportunity Act,” NPRM RIN 1205-AB74 (Docket No. ETA-2015-0002), “Workforce Innovation and Opportunity Act – Joint Rule with U.S. Department of Education for Combined and Unified State Plans, Performance Accountability, and the One-Stop System Joint Provisions,” and NPRM RIN 1830-AA22 (Docket No. ED-2015-OCTAE-0003), “Programs and Activities Authorized by the Adult Education and Family Literacy Act (Title II of the Workforce Innovation and Opportunity Act)”.

Single Stop is a national nonprofit organization that harnesses America’s most effective anti-poverty tools to create economic mobility for low-income families and individuals. Through a unique one-stop shop, Single Stop connects people to the resources they need to attain higher education, obtain good jobs, and achieve financial self-sufficiency.

We are dedicated to helping low-income individuals and families build economic security by coordinating access to resources such as free tax preparation, legal services, financial counseling, and public benefits. In 2009, we launched the Community College Initiative to increase completion rates of low-income community college students by addressing financial barriers facing these students. Single

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Stop community college sites enable students to tap into existing unspent federal and local resources that can be used as a supplemental form of financial aid helping them to graduate and get the skills necessary to enter the workforce. Since the inception of the initiative, Single Stop has served nearly 140,000 students and secured \$260 million in additional resources—tax credits, health insurance, nutrition assistance, and more—that students are using to pay for college. Currently, we have sites at 23 community colleges in 8 states (NY, NJ, CA, MA, LA, PA, MS and FL), and as we expand we hope partner with state workforce and adult education systems to reach an even greater number of low-income individuals.

Single Stop applauds WIOA’s new focus on career pathways as a way to improve both educational and employment outcomes for workforce and adult education system participants. The career pathways approach of providing continuous training and comprehensive supportive services to advance participants through school and training programs better equips them to enter and succeed in the workforce. Single Stop also commends the legislation’s recognition that career pathways programs should be implemented to benefit adults and youth (under “Title I”) as well as adult education students (under “Title II”). However, despite the focus on career pathways throughout Titles I and II of the new legislation, the Proposed Rules lack clear guidance on how Local Boards should implement these programs and how adult education should be aligned with other core programs to develop career pathways.

Single Stop also supports WIOA’s focus on aligning and integrating employment programs, training programs, and supportive services. However, the focus on supportive services can be strengthened through regulations and guidance from the Department of Labor and the Department of Education. The strengthening of the role of supportive services will result in increased retention and completion and therefore greater success under the legislation’s new accountability measures.

Single Stop’s comments are focused on strengthening features of WIOA that will enable more participants to have successful retention and completion outcomes, and are presented in three sections:

- I. First, Single Stop presents its comments on **NPRM RIN 1205-AB74** related the proposed rules about state unified and combined plans. Single Stop offers recommendations about supportive services, career pathways, and accountability measures.
- II. Next, Single Stop presents its comments on **NPRM RIN 1205-AB73** related to the Title I programs under WIOA. Specifically, Single Stop offers suggestions related to career pathways, Career Services, Governor’s Reserve funds, and pay-for-performance.
- III. Last, Single Stop presents its comments on **NPRM RIN 1830-AA22** related to adult education and literacy programs under Title II of WIOA. Single Stop’s recommendations are related to career pathways, state leadership activities, and a demonstration program as part of national leadership activities.

I. Single Stop Comments on NPRM RIN 1205-AB74

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1. *The Department of Labor and the Department of Education should align adult education and literacy activities with other core programs and one-stop partners by unifying the definition of supportive services across programs.*

Important goals of WIOA include the support of innovative strategies to improve outcomes for participants and aligning coordination between programs. Both of these goals may be accomplished by requiring that state plans outline a strategy to unify the wraparound services offered across programs. The Department of Labor and the Department of Education should add this requirement to § 676.105 and § 676.140, or alternatively, include it in the joint planning guidance that the Departments plan to release to help states implement the planning requirements for the Unified and Combined State Plans.

Supportive services are particularly important because of WIOA's emphasis on implementing career pathways and on dual enrollment in workforce and adult education services when participants could benefit from both. While the core services may necessarily be different depending on the target population, a similar set of supportive services can help each population succeed and help career pathways participants access employment and training. Furthermore, unifying the set of services would help align adult education with the other core programs, as the legislation requires.

In WIOA, Congress defined "supportive services" under § 3(59) as "services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under th[e] Act." These services were mandated throughout various parts of the law. However, for career pathways programs, wraparound services are simply called "other services," and for Career Services, recipients must receive information and referrals for child care, child support, medical or child health assistance through Medicaid and the Children's Health Insurance Program (CHIP), the Supplemental Nutrition Assistance Program (SNAP), the Earned Income Tax Credit (EITC), Temporary Assistance for Needy Families (TANF), and transportation services.

The quality and type of wraparound services should not be dependent on the program the individual participates in since innovative, evidence-based wraparound services can help all participants in the workforce and adult education systems succeed. Therefore, the Departments should encourage states to develop comprehensive wraparound services that are available to adults, youth, dislocated workers, and adult education students whenever possible.

2. *The unified definition of supportive services should include connections to benefit programs, legal assistance, financial counseling, tax preparation, and local community services.*

In the joint planning guidance that the Department of Labor and the Department of Education plan to release, the Departments should recommend that states align supportive services across programs by having the services include connections to benefit programs, legal assistance,

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financial counseling, tax preparation, and local community services. These are key aspects of supportive services for workforce participants and adult education students for the following reasons:

Benefits Enrollment: A University of Wisconsin-Madison study found that students who were served by Single Stop and received public benefits drew down an average of \$5,400 per student per year from non-traditional sources¹, as compared to a maximum Federal Pell Grant of \$5,645—suggesting that colleges can nearly double the financial resources for students to stay in school simply by helping them access non-traditional resources such as tax credits and safety net resources. Additionally, a report by the OMG Center for Collaborative Learning found that between summer 2011 and fall 2013, low-income students who received public benefits (specifically, SNAP, TANF, and TANF child care), enrolled in more terms on average during this period than a statistically matched comparison group.²

A McKinsey & Company consulting study found that each year, more than \$60 billion in government benefits do not reach individuals who are eligible for them. A key problem is the complexity of rules and the major statutory and regulatory differences between programs that compose the safety net. The complexity is particularly daunting for low-income adults and individuals who are basic skills deficient. Including assistance with accessing these benefits across the workforce and adult education system will increase financial resources for participants, enabling them to both participate in WIOA programs and improve their educational and employment outcomes.

Tax Credits: Tax credits like the Earned Income Tax Credit (EITC) and the Child Tax Credit (CTC) are vitally important to a family's economic success. Research shows that increased tax refunds boost college attendance by making college more affordable, which is particularly important to students in career pathways programs. While the majority of these tax credits assist working families and their children, evidence shows that these tax credits positively affect every stage of life³, which suggests that tax credits may aid in college and career program persistence in addition to helping working families.

Financial Counseling: Research has shown that financial education benefits both employers and employees because it increases financial stability and productivity. Moreover, financial education is the most effective at “teachable moments” in a person's life.⁴ Because of this,

¹ Goldrick-Rab, S., et al. “Clearing a path to a brighter future: Addressing barriers to community college access and success.” (2013). <http://kresge.org/sites/default/files/White-paper-barriers-to-community-college%20access-success.pdf>

² “Public Benefits and Community Colleges: Lessons from the Benefits Access for College Completion Evaluation.” (2014). OMG Center for Collaborative Learning. <http://www.omgcenter.org/sites/default/files/BACC%20Final%20Report%20%20-%20FINAL%2011914.pdf>

³ Marr, C., et al. “EITC and Child Tax Credit Promote Work, Reduce Poverty, and Support Children's Development, Research Finds.” (2015). <http://www.cbpp.org/cms/?fa=view&id=3793>

⁴ Servon, L. and Parrish, L. “Policy Options to Improve Financial Education: Equipping Families for their Financial Futures.” *New America Foundation Asset Building Program*. (2006). http://www.newamerica.net/files/Doc_File_3135_1.pdf.

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adults and youth who are engaged in new workforce activities are more likely to be receptive to financial education that can make better financial decisions and become more productive workers.

Additionally, there is a “disturbingly low level of financial literacy among college students⁵.” Students in the adult education system and participants in career pathways programs are responsible for significant financial decisions that can have a long-term impact on their futures. During these “teachable moments,” it is vitally important that students understand the financial aid process, how credit works, budget development and management, how to create a financial action plan, and ways to avoid negative debt.

Legal Services: Participants in the workforce and adult education systems may face a myriad of unexpected issues that could interfere with their ability to successfully complete their job training, job program, or education. These issues may include evictions, domestic violence, discontinuance of public benefits, and others that are best resolved with the assistance of an attorney. There is a shortage of legal services available to meet the need of low-income people,⁶ but by making these services available to workforce and adult education participants, the Department of Labor and the Department of Education will give participants an alternative to leaving their programs at crisis moments, and will therefore improve outcomes.

3. *The Department of Labor and the Department of Education should offer more specific guidance for operationalizing career pathways.*

Under § 676.105(d)(3)(v), the Departments should offer additional guidance on the operational planning of career pathways programs. The guidance should include acceptable strategies for braiding funding streams from Titles I and II of WIOA as well as ways to identify and improve career pathways programs. The guidance should particularly focus on how to successfully integrate wraparound services into career pathways programs.

4. *States should be encouraged to develop technology-based strategies to ensure that wraparound services are accessible to all people.*

The Department of Labor and the Department of Education should amend § 678.305 to strongly encourage states to develop a strategy to make wraparound services accessible outside of normal business hours, just as they are encouraged to do so for core services. The Departments highlight the importance of having services available to people with various working hours, different access to transportation, and different child care arrangements. Services may be

⁸ Goetz et al. (2011). “College-based personal finance education: Student interest in three delivery methods.” *Journal of Financial Counseling and Planning*, 22.1: 27-42.

⁶ Johnstone, Quintin. “Law and policy issues concerning the provision of adequate legal services for the poor.” *Cornell JL & Pub. Pol’y*. 20 (2010): 571-642. http://heionlinebackup.com/hol/cgi-bin/get_pdf.cgi?handle=hein.journals/cjlp20§ion=24.

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provided in-person at a one-stop or by phone or other technology that is provided by trained and available staff within a reasonable time. As states are asked to develop strategies for comprehensive wraparound services, they should also be asked to consider strategies, which may include web-based tools, phone support centers, or other technology, to ensure that these wraparound services are accessible to all people despite their locations or schedules.

5. *The term “exit” for the purposes of accountability should refer to a common exit across WIOA programs.*

Under § 677.150(c), the term “exit” is defined for the purposes of the uniform performance accountability system. This definition should be changed to make clear that “exit” refers to a common exit across programs in order to best support participants of career pathways programs as well as other dual-enrollees. This definition will be critical to § 677.155(a)(1)(iv), which “measures postsecondary credential attainment and high school completion of program participants during participation in the program or within 1 year after exit.” Cross-enrollment may lead to participants furthering their training in one program after leaving another, and therefore these outcomes will not be achievable within 1 year unless a common exit definition is adopted.

6. *Measurable skills gains indicators should be set at the documented progress measure level and all measures should be ones that can be easily standardized.*

WIOA includes six accountability measures to evaluate performance across all its programs. States must include the primary indicators of performance in their state plan, and are permitted to include measures beyond the six in WIOA. As states consider these measures, the Department of Labor and the Department of Education should amend § 677.155(a)(1)(v) to provide additional guidance about the fifth accountability measure: “the percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.” In the Proposed Rules, the Departments defined “measurable skill gains” as “documented academic, technical, occupational or other forms of progress, toward the credential or employment” and asked for comments on how to standardize the skills gains and whether targets should be set at the indicator or documented progress level.

Standardization is more easily achieved by linking the target to a documented progress measure level. The Department’s proposed set of indicators recognize the variety in WIOA programs, including academic, technical, and occupational programs. The proposed documented progress measure for postsecondary education, “a transcript or report card for either secondary or post-secondary education for 1 academic year (or 24 credit hours) that shows a participant is achieving the State unit’s policies for academic standards,” is an example of a measure that can be standardized. The Departments should consider expanding this

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measure to include a demonstration of semester-to-semester retention, which is a key indicator of academic success and is missing from the accountability measures.

II. Single Stop Comments on NPRM RIN 1205-AB73

1. *The Department of Labor should require states to implement comprehensive supportive services as part of developing career pathways programs.*

The Proposed Rules discuss career pathways development, and indicate that implementing career pathways that align employment, training, education, and supportive services is required under the new law. However, the regulations should offer additional guidance around the supportive services that should be required as part of these programs, in particular around the definition of “other services” in the legislation.

Section 3(7) of the WIOA legislation defines “career pathway” as a “combination of rigorous and high-quality education, training, and other services that” achieve seven objectives including “organiz[ing] education, training, and other 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.” The “other services” in this definition are not further clarified by either legislation or regulation. The regulations do imply that supportive services are needed by suggesting in III(B) that implementing the program requires robust relationships with supportive service agencies. The regulations also suggest at § 688.220 that supportive services make program participants more likely to succeed: “Programs that enter into various types of partnerships are able to provide participants with needed supportive services, increasing the likelihood that they will succeed both during and after their participation in the program.”

Because wraparound services have been shown to increase retention, the Department of Labor should clarify career pathways for Youth under § 681.420(a)(2) to define that the “other services” of career pathways programs include full wraparound services that connect participants to existing federal, state and local financial supports including tax credits, health and human services programs, and legal services, in addition to employment counseling. These supportive services are particularly important for youth who co-enroll in Title I and Title II programs in accordance with § 681.430 and § 681.230. Career pathways programs will be key to successful integration of Title I and Title II programs, and co-enrollees will need wraparound services for them to succeed.

The Department should also add a section clarifying that this bundle of services should be part of career pathways for all populations. Including this bundle of services will strengthen the workforce and adult education systems and ensure that participants have the greatest chance of success.

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2. *The Department of Labor should provide additional guidance for the state and local boards on the development of career pathways.*

Under § 679.130(c) and § 679.300, the State and Local Boards are responsible for the development of career pathways, but the regulations lack guidance of how these Boards must develop and implement career pathway programs. The Department of Labor should add new sections under Part 679 Subpart A and Part 679 Subpart C clarifying the minimum requirements consistent with the language in § 101(d)(3)(B) and § 107(d)(5) of WIOA that describe the minimum requirements of how services should be provided to adults, youth, and individuals with barriers to employment. These requirements should outline an approach to supportive services that has proven effective in career pathways programs.

Jobs for the Future recently issued policy guidance for scaling successful career pathways approaches, and one of the key recommendations was for programs to have a suite of research-based, wraparound student support services.⁷ Additionally, one MDC report on services offered by community colleges based on an approach by the Center for Working Families shows promising outcomes indicating that bundling of employment and career advancement services, income and work supports, and financial services and asset-building supports can increase retention. The bundling of these services is a key feature—at one school 61% of students who received bundled services accomplished a short-term economic goal versus 16% of students who did not receive bundled services⁸. Single Stop has seen similar results in our work. Initial studies of Single Stop sites at the City University of New York found that receipt of Single Stop services was associated with a 14% to 17% increase in semester-to-semester retention. In light of this evidence and these recommendation, the minimum requirements should include bundled, comprehensive wraparound services.

3. *The adult education system should be a required partner in career pathways agreements.*

Single Stop supports the proposal at § 679.37(f) that Local Boards should be required to connect with representatives of secondary and postsecondary education programs in the local area to develop and implement career pathways programs; however, we encourage the Department of Labor to include the adult education system as a required partner as well. Providers of Title II adult education services are critical to the development of career pathways and partnerships with these organizations will ensure that Title I participants are readily able to take advantage of career pathways programs and get access to secondary and postsecondary school.

⁷ Couturier, Lara K. "Policy Meets Pathways: A State Policy Agenda for Transformational Change." *Jobs for the Future*. (2014). <http://www.iff.org/sites/default/files/publications/materials/Policy-Meets-Pathways-030415.pdf>.

⁸ Liston, Cythia D. and Donnan, Robert. "Center for Working Families at Community Colleges: Clearing the Financial Barriers to Student Success." *MDC*. (2012). <http://mdcinc.org/sites/default/files/resources/CWF%20Clearing%20the%20Financial%20Barriers%20to%20Student%20Success%20-%20Complete.pdf>.

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4. *The definition of Career Services should be clarified to include pre-screening, application assistance, and co-location of application assistance services for the programs for which Career Services operators must provide information and referrals. The Department of Labor should encourage partnerships with local nonprofit organizations to provide these services.*

In § 134(c)(2)(A) of WIOA, Congress defined Career Services for individuals served through the one-stop delivery system to include providing information and referrals for child care, child support, medical or child health assistance through Medicaid and the Children’s Health Insurance Program (CHIP), the Supplemental Nutrition Assistance Program (SNAP), the Earned Income Tax Credit (EITC), Temporary Assistance for Needy Families (TANF), and transportation services. The definition also requires an “initial assessment” of supportive service needs. However, the services that must be provided as Career Services are “a minimum,” which suggests that one-stop providers should be providing more.

In § 680.150 of the Proposed Rules or in separate guidance, the Department of Labor should clarify that an “initial assessment” and “provision of information” for these types of benefits and services are best accomplished when program eligibility is considered. The Department should further clarify that these information and referral services should therefore include application assistance that is co-located at the one-stop location and a pre-screening for eligibility. Moreover, the Department should encourage one-stop providers to partner with local non-profit organizations to ensure these services are provided. This clarification of Career Services will offer participants the greatest chance of getting the financial and other supports they need for successful employment and education outcomes, and also supports the Department’s goal of having job seekers access services through a “common front door.”

5. *Career Services may be included as part of career pathways programs, and funding should be accessible through Title I or Title II.*

When the Department of Labor provides additional guidance around the development and implementation of career pathways, the Department should clarify that Title I Career Services may be included as part of a career pathway program. The Department should also clarify that both Title I and Title II funding streams may be used for the elements of career pathways programs.

6. *The Department of Labor should offer additional guidance to states about using the Governor’s Reserve funds to implement programs that will use innovative approaches to align the core Title I programs with Title II.*

Single Stop supports the flexibility that the Department of Labor has given to states under § 682.210 for the types of statewide activities that can be implemented using the Governor’s Reserve (State set-aside funds). The examples that the Department gave to illustrate the kinds

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of programs that should be considered will lead to improvements in the workforce system. To provide the greatest number of WIOA participants with innovative services, the Department should amend the section or provide additional guidance to encourage states to consider programs that will help align the core Title I programs with one another as well as Title II programs, as WIOA requires.

For example, Proposed Rule § 682.210(g) allows states “to support the development of alternative, evidence-based programs, and other activities which increase the choices available to eligible youth and encourage them to reenter and complete secondary education, enroll in post-secondary education and advanced training, progress through a career pathway, and/or enter unsubsidized employment that leads to economic self-sufficiency.” Though the Governor’s Reserve is a Title I funding stream, eligible youth that enter and complete secondary or postsecondary education, particularly through a career pathway program, will likely be dual enrollees in Title I and Title II programs, and therefore these funds will better support Title I and Title II if states are encouraged to develop programs that serve participants across all core programs.

Additionally, Proposed Rule § 682.210(m) allows states “to utilize technology to allow for remote access to training services provided through the one-stop delivery system...particularly [for]...participants in rural areas.” Through technology, these rural participants may be provided with remote access to resources that can help them complete Title I programs, but there may be innovative approaches that, once implemented, will benefit Title II participants as well. For example, technology that provides access to comprehensive supportive services can equally help an individual complete a Title I training program as it can help an individual complete a Title II adult education program.

7. *The Department of Labor should encourage pay-for-performance grantees to work in partnership with evidence-based nonprofits that specialize in retention and completion.*

As Subpart E explains, pay-for-performance is designed to encourage innovation and the adoption of evidence-based approaches to improve outcomes for training programs. Single Stop strongly supports the goal of this contracting strategy, and to encourage more pay-for-performance applicants, and therefore foster innovation in the workforce system, the Department of Labor should issue guidance under § 683.510(k) that encourages pay-for-performance grantees to work in partnership with evidence-based nonprofits that specialize in program completion. Through Single Stop’s experiences partnering with community colleges to provide wraparound services to students in programs that lead to postsecondary credentials and increase skill gains for employability, we have learned that these partnerships will improve retention and completion rates of training programs and help grantees achieve the specified levels on the primary indicators of performance.

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III. Single Stop Comments on NPRM RIN 1830-AA22

1. *The Department of Education should require states to implement comprehensive supportive services as part of developing career pathways programs.*

The Proposed Rules discuss career pathways development and expand of the purposes of the Adult Education and Family Literacy Act (AEFLA) under § 463.1 to include career pathways programs. Single Stop applauds this expansion of the purposes of AEFLA; however, the regulations should offer additional guidance around the supportive services that should be required as part of these programs, in particular around the definition of “other services” in the legislation.

Section 3(7) of the WIOA legislation defines “career pathway” as a “combination of rigorous and high-quality education, training, and other services that” achieve seven objectives including “organiz[ing] education, training, and other 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.” The “other services” in this definition are not further clarified by either legislation or regulation.

Because wraparound services have been shown to increase retention, the Department of Education should clarify career pathways in § 463.38 or by adding another section under 34 CFR Part 463 to define the “other services” of career pathways programs as including full wraparound services that connect participants to existing federal, state and local financial supports including tax credits, health and human services programs, and legal services, in addition to employment counseling. Including this bundle of services will strengthen the workforce and adult education systems and ensure that participants have the greatest chance of success.

2. *The permissible state leadership activities should be clarified to include a comprehensive approach for retention using evidence-based strategies.*

Among the permissible state leadership activities in § 223(a)(2) of Title II of WIOA is (F), “the development and implementation of a system to assist in the transition from adult education to postsecondary education, including linkages with postsecondary educational institutions or institutions of higher learning.” This activity can be strengthened and clarified through regulation. The Department of Education should clarify through another section under 34 CFR Part 463 that this activity includes efforts to promote retention by developing comprehensive approaches to retention based on evidence-based strategies.

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3. *The Department of Education should conduct a demonstration project relating to implementing innovative wraparound services approaches that address financial barriers to program completion for adult learners who want to transfer to degree programs and obtain a postsecondary credential.*

The Department of Education should use its directive under § 242(c)(2)(C)(ii) of WIOA to establish and carry out a program of national leadership activities to authorize funding for a demonstration program to provide grants on a competitive basis to public or private organizations, postsecondary educational institutions, and institutions of higher education for the purpose of implementing innovative wraparound services approaches that address financial barriers to program completion for adult learners who want to transfer to degree programs and obtain a postsecondary credential. The grant would fund a package of innovative services deemed Student Success Centers including but not limited to benefits enrollment coordination activities relating to the enrollment and identification of individuals into state, local and federal benefits programs; connections to Volunteer Income Tax Assistance (VITA) to help participants access tax credits; financial literacy and counseling; legal services; and connections to local community services including job training, food pantries, housing counselors and domestic violence programs.

This demonstration project would help to develop the most effective adult education programs and to understand the critical role that supportive services play in the retention and completion of adult education and literacy students. Because of WIOA's new focus on achieving postsecondary credentials as an accountability measure, this is an opportunity to provide states with a greater understanding of how implementing wraparound services can improve retention and completion outcomes.

Moreover, the Success Center grants would encourage colleges to develop sustainable models for coordinated access to financial supports including training staff to provide benefits counseling and case management services, utilize service learning and other coursework to scale counseling programs, and use on-line screening and resource referral tools to connect students to existing resources. These three- to five-year demonstration grants would include a required evaluation component on the impact of these services on student retention.

Thank you again for the opportunity to present comments on WIOA, and thank you for your consideration of our recommendations.

Sincerely,

Andrew Stettner
Chief Program Officer

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