

Funding Career Pathways and Career Pathway Bridges

A FEDERAL POLICY TOOLKIT FOR STATES



OCTOBER 2010

Revised Edition

TOOLKIT

About CLASP

CLASP develops and advocates for policies at the federal, state and local levels that improve the lives of low income people. In particular, we seek policies that work to strengthen families and create pathways to education and work. For more information, visit www.clasp.org.

About the Center for Postsecondary and Economic Success

The Center for Postsecondary and Economic Success is a policy and advocacy initiative within CLASP. The mission of the Center is to advocate for policies and investments that can increase the number of low-income adults and disadvantaged youth who earn marketable postsecondary and industry credentials that are essential to opening doors to good jobs, career advancement, and economic mobility.

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Introduction

The current economic recession underscores the value of education in the workforce: More highly educated workers experience lower levels of unemployment than workers with lower levels of education and skill. While the average unemployment rate in September 2010 was 9.6 percent, the unemployment rate was just 4.4 percent for individuals with bachelor's degrees or higher, 9.1 percent for individuals with some college or an associate degree, 10 percent for high school graduates with no college, and 15.4 percent for those with less than a high school diploma.¹

Less educated workers will experience little relief in this slow economic recovery as the growing demand for education and skills is unlikely to relent. Recent data from the Bureau of Labor Statistics indicated that one-third of all job openings and nearly half of all new jobs that will be created between 2008 and 2018 will require a postsecondary degree or credential. The fastest growth in new jobs will be in occupations requiring an associate degree: 19.1 percent, compared to 16.6 for bachelor's degrees, 13.2 for postsecondary vocational awards, and between 7.5 and 8 percent for on-the-job training (which varies considerably in length).²

Although the labor market demands a more educated workforce, millions of workers are ill-equipped for these jobs. Nearly half the U.S. workforce has only a high school education or less. Some 25 million workers aged 18 to 64 lack a high school diploma or GED, while another 52 million adults have no postsecondary education. Furthermore, this country cannot rely solely on new entrants to the workforce to meet this demand. About two-thirds (65 percent) of our 2020 workforce is already beyond the reach of our elementary and secondary schools.³

Millions of workers are ill-equipped for higher skilled jobs, and, unfortunately, our adult education, workforce development, and postsecondary education systems are ill-equipped to prepare them for these jobs. These systems are hobbled by institutional silos, poor alignment between educational institutions, and disconnects between the institutions and the needs of the labor market. They are plagued by leaky pipelines in which adult education and English language programs are generally not connected to job training and other postsecondary education programs. Most college developmental education programs are disconnected from college occupational and academic programs. Non-credit occupational education is disconnected from for-credit certificate and degree programs. And few of any of these programs are closely connected to employer and industry needs.⁴

DEFINITIONS: CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

One approach many states are adopting to fix fragmented and leaky educational pipelines is that of career pathways and career pathway bridge models. **Career pathways** are linked education and training services that “enable students, often while they are working, to advance over time to successively higher levels of educa-

tion and employment in a given industry or occupational sector. Each step on a career pathway is designed explicitly to prepare students to progress to the next level of employment and education” (Oregon Career Pathways initiative). Ideally, career pathways are not a separate program, but a framework for weaving together adult education, training, and college programs that are currently separated into silos and connecting those services to employers’ workforce needs.

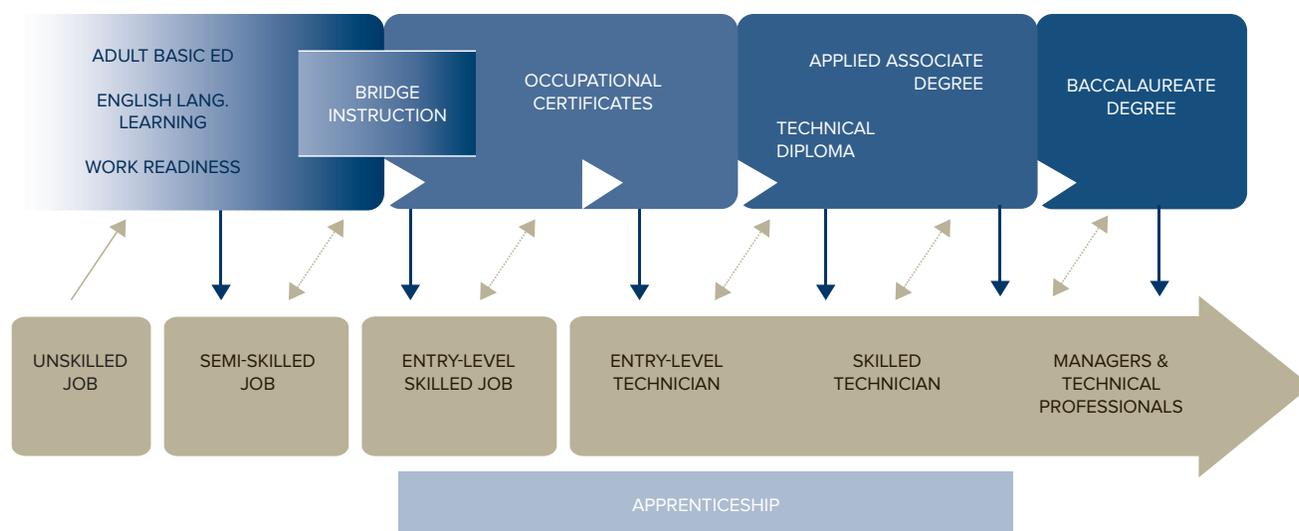
The core components of career pathways are:

- Multiple entry points, e.g., from adult education, ESL programs, workforce training, and not simply through high school.

Career pathway bridge programs or instruction combine basic academic and English language content with postsecondary occupational content to help lower-skilled workers and out-of-school youth earn credentials valued by employers. Through new curricula and joint planning and instruction, this model helps bridge the skills gap that can prevent them from entering and succeeding in postsecondary education.

Career pathway bridges tailor and contextualize adult basic education and English language content to general workplace needs and to the knowledge and skills needed in specific occupations. Additional features of career pathway bridges may include dual enrollment in basic

CAREER PATHWAYS AND CAREER PATHWAY BRIDGES



Credit: Wisconsin Regional Industry Skills Education (RISE) Initiative

- Innovations in program content and delivery, e.g., flexible scheduling, contextualization, integration of bridge programs.
- Sequence of education and training leading to credentials with value in the labor market.
- Support services (provided by community organizations, community colleges, and/or other organizations).
- Strong role for employers in pathway development, worksite training, and contribution of resources.

skills and technical education courses and articulation of academic and technical content and credentials leading to the next step in a career pathway.

Career pathway bridges require close partnerships among education and training sectors—such as adult basic education, developmental education, skills development, and other postsecondary education systems. Other essential partners are employers and unions, community-based organizations, and social service agencies.

To the extent that they include postsecondary content, career pathway bridge models may qualify for college full-time equivalent (FTE) financing, student financial aid, Perkins funding, and other financial resources that can fund instruction and student supports.

At least seven states—Arkansas, Illinois, Kentucky, Massachusetts, Ohio, Oregon, and Wisconsin— have explored or adopted career pathways approaches to help working adults access and succeed in postsecondary education. Some states—including Illinois, Minnesota, Ohio, Oregon, Washington, and Wisconsin—are also engaged in bridge initiatives connected to career pathways. Among the states that have launched career pathways or career pathway bridge efforts, four are the Midwestern states of Illinois, Minnesota, Ohio, and Wisconsin that are part of the Shifting Gears state policy initiative to promote regional economic growth by improving the education and skills training of the workforce.

The momentum for career pathways and career pathway bridges has grown over the last decade. It is likely that more states and institutions will initiate these types of models since they have been highlighted in recent federal legislation, such as the workforce development funding under the American Recovery and Reinvestment Act. The Obama administration has signaled that it intends to use WIA reauthorization to continue policy reforms begun under the Recovery Act, especially those that create better pathways for lower-skilled adults and out-of-school youth to postsecondary credentials and to careers. Also, philanthropic organizations increasingly are supporting these types of efforts, such as The Joyce Foundation, the Bill & Melinda Gates Foundation and foundations involved in the National Fund for Workforce Solutions.

Using the Toolkit

This toolkit is designed to help interagency state teams to identify and use federal resources to support career pathways and bridges into them for adults and out-of-school youth. Specifically, the toolkit aims to help states:

- Understand possible key components and tasks involved in developing, implementing, and maintaining career pathways and career pathway bridges.
- Identify how federal resources can support these key components and tasks.
- Pinpoint state policy changes or other state actions needed to fully realize federal funding opportunities for pathways and bridges into them.

WHO SHOULD USE THIS TOOLKIT?

This tool will be most useful for state-level interagency teams engaging in discussions about resources and policies across workforce development, adult education, postsecondary education, and support service programs that can support career pathways and career pathway bridges. In addition, the federal program summaries may be a useful resource for regions or communities seeking to better understand federal resources that can support career pathway and career pathway bridge efforts at the regional or local level.

HOW TO USE THIS TOOLKIT

This toolkit is divided into two main sections: (1) a funding options worksheet, and (2) federal program summaries. (The funding options worksheet is adapted from a framework first developed by the state of Wisconsin as part of its RISE career pathways initiative.)⁵

We recommend the following steps for using these two components to identify how federal programs might support your state's career pathways and career pathway bridge efforts:

STEP 1: The state should review the key tasks for building career pathways in the funding options worksheet on page 9. The state can use the blank worksheet provided or download a blank worksheet from the CLASP Web site to customize the key tasks for the state's specific initiative.

- Identify the specific target population(s).
- List the key tasks for developing and implementing your approach under each of the main sections: Business and Industry Engagement, Program Innovation, Student Supports and Student Success Services, Student Aid, and Systems and Partnerships.

Note: The state may want to use the sample tasks provided in the example and/or may want to customize tasks based on the specific interests or needs of the state.

STEP 2: Review the federal program summaries in Section III to identify resources that might support your state’s career pathways initiative. Complete the worksheet with specific information on how individual federal programs can support key tasks in your state’s career pathways initiative.

- Read the program summaries and note state examples, program limitations, and opportunities.
- Multiple federal programs can be included in one worksheet. Some states may want to include just one or a few programs per worksheet and include details about each funding source in the cells. Other states may want to include a column for each of the ten federal programs and simply check off which federal funding sources can fund specific tasks. It may be useful to use multiple worksheets, grouping similar federal programs on each.

STEP 3: Identify state policy changes or actions needed to remove barriers or encourage wider use of federal resources to support career pathways and bridges into them.

Note: States may want to make the funding options worksheet a living document by updating it as policies change, programs are reauthorized, etc.

OVERVIEW OF FEDERAL PROGRAM SUMMARIES

This toolkit includes summaries of ten federal programs that can support various components of state career pathways and career pathway bridges into them. They are administered by four federal departments.

Administered by the U.S. Department of Labor:

- Workforce Investment Act Title I: Adult and Dislocated Worker
- Workforce Investment Act Title I: Youth
- Trade Adjustment Assistance
- Registered Apprenticeship and Pre-Apprenticeship
- Employment Service (Wagner-Peyser Act)

Administered by the U.S. Department of Education:

- Workforce Investment Act Title II: Adult Education and Family Literacy Act
- Pell Grant
- Carl D. Perkins Career and Technical Education

Administered by the U.S. Department of Health and Human Services:

- Temporary Assistance for Needy Families

Administered by the U.S. Department of Agriculture:

- Supplemental Nutrition Assistance Program
Employment and Training

Some federal program resources may be more supportive of certain key tasks than others. For example:

Federal programs that may support staff to perform tasks relevant to **Business and Industry Engagement** and **Systems and Partnerships**:

- Employment Service (Wagner-Peyser Act)
- Temporary Assistance for Needy Families
- And others

Federal programs that may support **Program Innovation:**

- Workforce Investment Act Title II: Adult Education and Family Literacy Act
- Carl D. Perkins Career and Technical Education
- And others

Federal programs that may support **Student Support/Success Services:**

- Temporary Assistance for Needy Families
- Supplemental Nutrition Assistance Program Employment and Training
- Trade Adjustment Assistance
- And others

Federal programs that may provide **payment directly to students and/or for education/training:**

- Workforce Investment Act Title I: Adult and Dislocated Worker
- Pell Grant
- Trade Adjustment Assistance
- And others

States may think of additional federal resources that can be brought to bear on pathways and career pathway bridge efforts; this toolkit does not try to provide an exhaustive list, just detailed insights into some of the most significant ones.

FUNDING OPTIONS WORKSHEET

Below is a tool that lists sample key tasks in designing, implementing, and sustaining career pathway and career pathway bridges. An [electronic version of this tool](#) that can be customized for your state can be found on the CLASP Center for Postsecondary and Economic Success Web site.

Major Federal Funding Streams That Support Key Tasks in Building Career Pathway and Career Pathway Bridges

KEY TASKS		FEDERAL PROGRAM A	FEDERAL PROGRAM B
TARGET POPULATION: (e.g., TANF recipients, at risk or out-of-school youth)			
BUSINESS AND INDUSTRY ENGAGEMENT			
<ul style="list-style-type: none"> Identify sectors and employers within sectors needing skilled workers and offering employment opportunities at different levels 			
<ul style="list-style-type: none"> Identify the skill needs and employment opportunities at different levels to inform creation of related educational opportunities 			
<ul style="list-style-type: none"> Create hands-on learning opportunities hosted or sponsored by employers, such as job shadowing, internships and work experience 			

PROGRAM INNOVATION

- | | | |
|--|--|--|
| <ul style="list-style-type: none"> Define, with employer input, the steps leading to certificates, licenses or degrees and relevant employment opportunities at each level | | |
| <ul style="list-style-type: none"> Maximize the ability to build toward credentials over time through articulation and transfer (dual enrollment), especially between credit and non-credit offerings | | |
| <ul style="list-style-type: none"> Create “Road Maps”—visual representations of educational and employment pathways | | |
| <ul style="list-style-type: none"> Create or re-write curricula for short-term credentials linked to jobs and imbedded in educational pathways | | |
| <ul style="list-style-type: none"> Develop instructional formats that accelerate and compress content | | |
| <ul style="list-style-type: none"> Make programs accessible to non-traditional students through flexible scheduling and alternative locations and innovative use of technology | | |

KEY TASKS

FEDERAL PROGRAM A

FEDERAL PROGRAM B

PROGRAM INNOVATION (continued)

- Enroll students in groups through learning communities, etc.
- Combine basic skills with occupational training (in both developmental education and ABE/ESL) to enable low-skilled adults to enter and complete programs leading to credentials
- Build essential skills needed for the workplace, career and postsecondary success
- Increase awarding of credit with wider use of credit for prior learning
- Pay for unreimbursed program costs (e.g., equipment and faculty time for team teaching) not fully covered by tuition and institutional support

STUDENT SUPPORTS AND STUDENT SUCCESS SERVICES

- Provide career planning and assessment services

STUDENT SUPPORTS AND STUDENT SUCCESS SERVICES (continued)

<ul style="list-style-type: none"> • Provide academic support and tutoring 		
<ul style="list-style-type: none"> • Provide case management and coaching, including navigation of financial aid options and educational programs 		
<ul style="list-style-type: none"> • Provide support services, such as child care and transportation 		
<ul style="list-style-type: none"> • Provide mentoring for youth 		
<ul style="list-style-type: none"> • Enable students to participate in work experience, internships 		
<ul style="list-style-type: none"> • Make available job search assistance and placement assistance 		

STUDENT AID

- Provide direct student assistance (e.g., tuition, fees, books and supplies) or pay for the costs of student participation in education and training programs

- Cover indirect costs of attendance (e.g., living expenses)

SYSTEMS AND PARTNERSHIPS

- Identify/Employ dedicated staff to maintain business/education and other pathway partnerships with community organizations, such as labor or community-based organizations

- Use data to identify sectors and related educational and employment pathways

- Use data to measure student progress and transitions to career and postsecondary success and evaluate program performance

FEDERAL PROGRAM SUMMARIES

Administered by the U.S. Department of Labor:

Workforce Investment Act Title I: Adult and Dislocated Worker	15
Workforce Investment Act Title I: Youth	18
Trade Adjustment Assistance.	21
Registered Apprenticeship and Pre-Apprenticeship	23
Employment Service (Wagner-Peyser Act).	26

Administered by the U.S. Department of Education:

Workforce Investment Act Title II: Adult Education and Family Literacy Act	28
Pell Grant.	31
Carl D. Perkins Career and Technical Education.	35

Administered by the U.S. Department of Health and Human Services:

Temporary Assistance for Needy Families.	38
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Administered by the U.S. Department of Agriculture:

Supplemental Nutrition Assistance Program Employment and Training.	40
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Workforce Investment Act Title I: Adult and Dislocated Worker

Overview: The Workforce Investment Act (WIA) authorizes the nation’s federally funded workforce development system and provides funding for “one-stop” career centers in which employers and job seekers can access a wide array of employment and training services. The Act consists of Title I (adults, dislocated workers, and youth), Title II (adult education and literacy), Title III (workforce investment-related activities), Title IV (vocational rehabilitation), and Title V (general provisions). WIA Title I includes three main funding streams distributed to states: adult, dislocated worker, and youth (see the next summary on WIA Title I: Youth).

Type of Program: Formula grants to states and localities. A portion of funds (15 percent) from each funding stream is reserved at the state level for statewide activities, and an additional portion of the dislocated worker funds (up to 25 percent) is reserved at the state level for rapid response activities. The remaining funds are distributed to local areas by formula.

Eligibility and Targeting: Under WIA Title I, “adults” are individuals age 18 and over. “Dislocated workers” include those who have been laid off or have received notice of termination from employment, are self-employed but unemployed due to general economic conditions, or are displaced homemakers. The adult funding stream incorporates a priority of service for public assistance recipients and other low-income individuals when funds are limited. Also, veterans have been added as a priority population as a result of the Jobs for Veterans Act of 2002.

Services/Program Support: Services under WIA Title I adult and dislocated worker range from information about careers and the local labor market, job search assistance, case management, assessments, and development of an employment plan to a variety of training services, such as occupational skills training, on-the-job training, customized training, and adult education and literacy in combination with other training services. Local areas also may provide supportive services and needs-related payments to assist individuals who are participating in employment and training activities.

Non-federal Funds: There are no state matching requirements under WIA.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

WIA adult and dislocated worker funds can be used to support several components of career pathway and career pathway bridge initiatives, including industry engagement, tuition, case management, and support services. Several states and local areas around the country have used WIA funds to support these initia-

tives in order to help employers find the skilled workforce they need and to ensure that program participants are able to move into jobs and careers that provide family-supporting wages.

FEDERAL FUNDS TO STATES

The 15 percent of adult, dislocated worker, and youth funds reserved at the state level for statewide activities

are typically referred to as *state discretionary funds*. These are more flexible than *local formula funds*, and states have used them to support the start-up and implementation of career pathway and career pathway bridge efforts. State discretionary funds can pay for incumbent worker training, pilots, and demonstrations and can support regional collaboration by local Workforce Investment Boards (WIBs).

States can also use *WIA incentive funds*—awarded for exceeding negotiated performance targets in WIA Titles I and II and Carl D. Perkins Career and Technical Education—to support innovative programs consistent with the goals of any of the three programs. These funds have been used to support career pathway bridges and career pathway initiatives.

- **Wisconsin** is using state discretionary funds to seed development of career pathway bridges that combine basic skills instruction and technical training.
- **Oregon** used incentive funds to support the initial development of career pathway programs at community colleges.

FEDERAL FUNDS TO LOCAL PROVIDERS

Local formula funds support the one-stop service delivery system that brings together multiple federally funded workforce development programs and services and pay for the provision of employment and training services for eligible individuals. WIA divides the employment and training services that can be funded through the adult and dislocated worker programs into the following three categories. All include services that can support individuals participating in career pathway bridges and career pathway initiatives:

1. **Core services.** These include the provision of information about jobs in demand, assistance with applications for programs of financial aid, initial assessment, and outreach and intake.
2. **Intensive services.** These include comprehensive assessment, case management, group and individual counseling, work experience, and short-term pre-occupational services to prepare individuals for unsubsidized employment or training.

3. **Training services.** These include occupational skills training, on-the-job training, customized training, job readiness training, and adult education and literacy activities when combined with another type of training.

Services are provided in sequence: core, leading to intensive, then to training. However, individuals do not have to pass through all the layers of service (or spend a particular amount of time in a layer of service) to demonstrate a need for training services. An individual can enter training if an assessment or an individual employment plan identifies the need for skill development.

WIA local funds can provide important support for the education and training components of career pathway and career pathway bridges. *WIA intensive funds* can sometimes be used to fund individuals in career pathway bridges through contracts with service providers. *WIA training funds* can be used to provide individuals with training that is part of a career pathway effort.

WIA local funds can also provide important services to help individuals succeed in a career pathway or career pathway bridge, such as supportive services (including child care, dependent care, and transportation), and needs-related payments. Local areas can also use WIA funds to support the employer engagement component of career pathway and career pathway bridge initiatives. Many local WIBs have established business liaison positions within one-stops who work with employers on the development and institutionalization of career pathway programs. A number of local WIBs have brought together employers to address industry challenges and training needs.

- Worksystems Inc. in **Oregon** uses WIA funds to provide training to participants in career pathway programs developed by Portland Community College.
- The Lincoln Trail WIB in **Kentucky**, in partnership with the local community college, uses WIA funds to provide counseling and training to participants in the education and training components of health care career pathways.

PROGRAM LIMITATIONS

WIA has several restrictions on how training can be paid for and delivered:

- Local WIBs are required to fund training by providing Individual Training Accounts (ITAs) for participants to use with eligible providers. There are certain exceptions, including customized training and on-the-job training, in which local WIBs can fund training through contracts with service providers. There is an additional exception for a training program run by a private or community-based organization that has demonstrated effectiveness in serving special populations with barriers to employment.⁶
- WIA funds generally cannot be used for curriculum development.
- WIA training funds must be coordinated with other grant assistance. They are restricted to individuals who are unable to obtain other grant assistance (such as Federal Pell Grants) or require assistance beyond what is available through other sources.
- Incumbent worker training programs are restricted to statewide discretionary funds or, if a state obtains a waiver, a certain percentage of local formula funds.⁷

OPPORTUNITIES FOR STATES

- Use state WIA discretionary funds to seed the development of career pathway and career pathway bridges.
- Build career pathway and career pathway bridge initiatives into state plans and into guidelines for local plans.
- Consider implementing a requirement that a certain percentage of WIA funds be spent on training to provide additional support for the educational components of pathway initiatives. To ensure that this type of policy encourages training services to low-skilled individuals and individuals with barriers to employment, the definition of training expenditures could include the costs of supportive services for clients receiving training, including those receiving training from other funding sources (for example, Temporary Assistance for Needy Families or Pell Grants). In addition, the definition of training should include

programs that incorporate basic skills and English language training.⁸

- Ensure that career pathway bridges and training programs that are part of career pathway initiatives are on the Eligible Training Provider List.
- Work with local areas to align Individual Training Account (ITA) policies across local areas and ensure that if ITAs are capped, they are capped at a level sufficient to support training within career pathway and career pathway bridges and instruction.
- Work with local areas to orient programs toward longer-term outcomes and employment leading to self-sufficiency. To help participants set long-term employment goals, provide guidance to ensure that career counseling includes a focus on self-sufficiency.⁹
- Promote co-enrollment with partner programs, such as Trade Adjustment Assistance and Adult Education, to maximize resources for career pathway and career pathway bridge initiatives.
- Provide information and technical assistance on career pathways and career pathway bridge programs and on how WIA can be used to support participants in these programs.

Workforce Investment Act Title I: Youth

Overview: Title I of the Workforce Investment Act includes funding streams for adults, dislocated workers, and youth. The intent of the WIA youth funding is to provide comprehensive interventions to youth that prepare them for labor market and postsecondary success.

Type of Program: Formula grants to states and localities; 15 percent remains at the state level for the governor's discretionary use (discretionary funds) and 85 percent is distributed by states via formula to local workforce areas through Workforce Investment Boards (local funds). Boards are required to contract these funds to local providers through a competitive process. Local areas have three years to expend each annual allocation.

Eligibility and Targeting: The Act is designed to serve low-income youth who face barriers to continued education and employment. To be eligible, a young person must be aged 14 to 21, be low-income, and have at least one of following barriers:

- Be deficient in basic literacy skills,
- Be a school dropout,
- Be homeless, a runaway, or a foster child,
- Be pregnant or a parent,
- Be an offender, or
- Require additional assistance to complete an education program or to secure and hold employment.

At least 30 percent of formula funds must be allocated for out-of-school youth. Youth who are enrolled in any school or alternative education program at the time of registration are not included in the definition of out-of-school youth.

Services/Program Support: Services provided depend on the specific service strategy customized to each youth and may include preparation for postsecondary education, linkages between academic and occupational learning, preparation for unsubsidized employment opportunities, and effective connections to intermediaries with strong links to the job market and to local and regional employers.

Non-federal funds: There are no state matching requirements under WIA.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Local areas are required to make services available to youth consistent with a service strategy based on individualized assessments of needs. Each youth's service strategy must include a career goal and must provide access to a variety of services. To meet a range of youth development needs, WIA establishes a set of 10 services—or “program elements”—that must be available in each local area for inclusion in a participant's plan, as appropriate. These services include tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies; alternative secondary school offerings; summer employment opportunities directly linked to academic and occupational learning; paid and unpaid work experiences, including internships and job shadowing; occupational skill training; leadership development opportunities, which include community service and peer-centered activities encouraging responsibility and other positive social behaviors; supportive services; adult mentoring for a duration of at least twelve months, that may occur both during and after program participation; follow-up services and comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.

At the local level, planning for the use of youth funds and the delivery of services to youth is governed by local Workforce Investment Boards (WIBs). A WIB is appointed by the chief elected official in the local workforce area, and a majority of the members must be from the business community. Each local board is required to establish a Youth Council whose members must include, among others, members of the local board with special interest or expertise in youth policy; representatives of youth service agencies, including juvenile justice and local law enforcement agencies; and parents of eligible youth.

The required program elements makes this funding stream ideally suited to contribute to the development of supported career pathways for youth who need more intensive assistance in navigating the transitions to college

or attaining occupational training, labor market credentials, and employment economically self-sustaining wages. Some governors have used WIA 15 percent *state discretionary funds* to support career pathways for youth. Local workforce boards and youth councils also have used their *local WIA funds* to support pathways programs for low-income in-school and out-of-school youth.

In **California** the San Diego Workforce Partnership (SDWP, the San Diego WIB) worked with the San Diego Community College District to develop the Career Pathways for After School Staff (CPASS) career pathway bridge model for students entering education or human service programs. The model includes basic skills remediation, college readiness courses, selected coursework in career pathways, counseling and work experience, and employment in after-school facilities. SDWP provided the planning and development, as well as case management and support services, including \$800 stipends to help pay for transportation, child care, and other living expenses. The Community Colleges Chancellor's Office has committed \$1.5 million over two years to support five CPASS programs across the state (supplemented with philanthropic funding).

The Baltimore, **Maryland**, WIB uses WIA Youth funds to support the Career Academy, an alternative education center jointly administered by the Mayor's Office of Employment Development and the Baltimore WIB. The Career Academy provides multiple pathways for students to obtain an academic credential, including earning a high school diploma, enrolling in a GED program, enrolling in a Diploma Plus program, or enrolling in Job Corps. In the Diploma Plus model, students earn a diploma and college credits through the Early College Enrollment program at Baltimore City Community College.

PROGRAM LIMITATIONS

- This funding stream has specific income eligibility certification requirements, and the maximum household income for participation is set by statute at 70 percent of the lower living standard income level. While this helps to target funds to the most needy, it also makes it somewhat more complicated to blend

these funds with other resources that do not have such a narrow target population.

- All grants and contracts for youth services must be awarded based on a competitive process making it somewhat difficult to negotiate customized training or pipeline programs with specific employers.

OPPORTUNITIES FOR STATES

While the responsibilities for programming the WIA Title I youth funding fall to the local workforce areas, there are several ways that states can impact and assist local areas in moving in this direction:

- Establish a state youth council (or similar entity) to bring together leadership from across systems and sectors in order to provide strategic guidance to state and local efforts to coordinate and align the resources and programming across the education, workforce, and state-administered youth serving systems. While not required by WIA statute, several states have established a state youth council or similar entity, including Alaska, Arizona, Colorado, Connecticut, Delaware, Florida, Nevada, New Hampshire, North Dakota, Ohio, Oklahoma, Oregon, and Utah.
- Provide technical assistance to strengthen the strategic activities of local boards in order to facilitate coordination among education, workforce, foster care, and juvenile justice systems and to provide local areas with labor market and career information.
- Request federal waiver to allow Title I youth funds be used for Individual Training Accounts (ITAs) for youth. ITAs, coupled with the counseling and other wraparound supports available in well-designed youth development programs, can provide an effective way for the WIA youth system to offer career pathway bridge programming to help low-income youth to access and succeed in postsecondary endeavors. Thirty-four states have been granted such a waiver.
- Set aside a portion of the discretionary funding to offer incentives for developing local pathway models. Use the state funding to leverage the expenditure of local WIA youth funds to create career pathways linked to growing areas of the state or regional economy.



Per the U.S. Department of Labor, effective February 15, 2011, TAA reverts from the expanded program under the 2009 amendments to the previous version of the program, which is based on the 2002 amendments. Until further notice, this program summary - which is based on the expanded TAA program - is no longer available. We regret any inconvenience this may cause.

For further information on the TAA program change, see:
<http://www.doleta.gov/tradeact/changesfaq.cfm>

Registered Apprenticeship and Pre-Apprenticeship

Overview: The National Apprenticeship Act of 1937 authorizes the federal government, in collaboration with states, to oversee the nation's apprenticeship system. Registered Apprenticeship programs provide opportunities for participating individuals to gain on-the-job training combined with classroom instruction that will lead to portable credentials. Participating employers develop a steady pipeline of skilled workers. As of 2008, there were about 480,000 apprentices in about 27,000 apprenticeships registered with the U.S. Department of Labor's Office of Apprenticeship. Some estimate that there might be another 500,000 or more in unregistered programs.¹¹

Pre-apprenticeship programs are designed as bridges into Registered Apprenticeship programs for those who do not meet the eligibility requirements for a Registered Apprenticeship program. They are typically short-term training programs that are recognized by the U.S. Department of Labor but are not registered.

Type of Program: Nationally administered program.

Eligibility and Targeting: Registered Apprenticeship program sponsors identify the minimum qualifications to apply to their apprenticeship program. The eligible starting age can be no less than 16 years of age; however, individuals must usually be 18 years old to be an apprentice in hazardous occupations. Program sponsors may also identify additional minimum qualifications and credentials to apply, e.g., education, ability to physically perform the essential functions of the occupation, proof of age. All applicants are required to meet the minimum qualifications. Based on the selection method used by the sponsor, there may be additional qualification standards, such as fair aptitude tests and interviews, school grades, and previous work experience.

Services/Program Support: Federal funding supports federal staff, many of whom are located in state and local offices, to develop programs that provide individuals with a mix of paid on-the-job learning, related technical instruction, and mentoring.

Non-federal Funds: There is no state matching requirement for this program; however, 25 states operate and fund State Apprenticeship Agencies recognized by the U.S. Department of Labor to register and oversee apprenticeship programs for federal purposes. Staff in these 25 states develop Registered Apprenticeship programs and provide assistance to program sponsors in those states.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Registered Apprenticeship programs include a mix of on-the-job experience and classroom training, allowing participating individuals to earn wages as they receive training and advance into jobs requiring a higher skill level. In effect, Registered Apprenticeship programs are career pathways. Pre-apprenticeship programs are very similar to career pathway bridges because they are designed to help individuals without the necessary prerequisites or skills to enter a Registered Apprenticeship program to gain the necessary education to begin such a program.

The federal funding for Registered Apprenticeship is used to support federal staff that works with apprenticeship sponsors to develop programs and ensure that they meet the necessary federal, state, and industry standards to be registered. Sponsors can be individual employers, employer associations, or labor-management partnerships. Funding for services such as training and case management can come from Apprenticeship sponsors, Workforce Investment Act (WIA), foundation funds, state grants, or other funds. Mentoring is a critical, required component of Registered Apprenticeship. Apprenticeship staff works with employers and training providers to define competencies for pre-apprenticeship programs that will act as bridges into Registered Apprenticeship programs. Funds to develop pre-apprenticeship programs may come from the Apprenticeship sponsor, WIA, the training provider, or state or foundation grants.

Washington has used WIA state discretionary funds to support some pre-apprenticeship programs that can act as a bridge into Registered Apprenticeship programs.¹²

Washington, D.C. has used general revenue funds to support pre-apprenticeship programs.¹³

Wisconsin is expanding the use of apprenticeship and pre-apprenticeship programs as part of its Regional Industry Skills Education (RISE) initiative. The Wisconsin Department of Workforce Development (DWD) is

the lead on this initiative, which seeks to create a state policy environment in which career pathways, including bridges, can flourish. DWD is holding joint WIA and Apprenticeship training for local WIA program staff; supporting new health care apprenticeships by funding industry engagement and curricula development, and partnering with Community Action Agencies (through the state association, WISCAP) to link initial weatherization training with skilled apprenticeship programs in green construction and energy occupations.

Registered Apprenticeship staff has deep connections to industry and can work to develop new apprenticeship programs as part of a pathway initiative. Apprenticeship programs can also be connected to community/technical colleges and college credit, which would promote integration with career pathways. While these connections are not widespread, some states and community colleges encourage collaboration.¹⁴

Washington provides a 50 percent discount on community college tuition for apprentices.

Florida exempts apprentices from community college fees, which saves the apprentice or the sponsoring employer about \$600 annually. Colleges in the state determine whether to grant college credit for apprenticeship education or training. For example, Seminole College offers apprentices up to 12 hours of credit toward an associate degree in construction management.

In the **Wisconsin** Technical College System, apprenticeship-related instruction is considered an approved academic program, and apprentices can earn 39 credits toward a 60-credit Journeyworker Associate of Applied Arts degree.

South Carolina has funded a \$1 million per year initiative called Apprenticeship Carolina, which is housed in the technical college system. The purpose is to encourage more employers to sponsor Registered Apprenticeships, and, since 2007, the program has registered an average of one new employer-sponsored apprenticeship program per week and more than doubled the number

of apprentices. In addition to the staff and marketing budget for the initiative, the state funds an employer tax credit of \$1,000 per year per apprentice as an incentive.

PROGRAM LIMITATIONS

- Registered Apprenticeship training programs must meet standards that are agreed upon by industry.
- In order to be eligible for a Registered Apprenticeship program, an occupation must require a certain amount of on-the-job learning and related instruction, which may be accomplished through classroom, occupational, or industry courses or through electronic media.

OPPORTUNITIES FOR STATES

- Develop new Registered Apprenticeship programs using a career pathway framework (and that are based on employer demand and availability of qualified workers).
- Support the development and expansion of pre-apprenticeship programs as bridges into Registered Apprenticeship for adults and youth who have traditionally not been able to access these programs.
- Create closer connections between Registered Apprenticeship and the other programs that can support career pathway initiatives, e.g., WIA.¹⁵
- Coordinate employer engagement activities between Registered Apprenticeship and career pathway initiatives.
- Include Registered Apprenticeship as part of the overall career pathways approach.
- Support the provision of academic credit for completion of apprenticeship programs or components of programs in order to provide students with increased opportunities for college-level work.

Employment Service (Wagner-Peyser Act)

Overview: The Employment Service provides employment services and counseling to job seekers and labor exchange services to job seekers and employers.¹⁶

Type of Program: Formula grants to states.

Eligibility and Targeting: Services are available to any individual job seeker, regardless of employment status. Veterans receive priority of service, and disabled veterans receive the highest priority. States are allowed to provide specialized assistance to other targeted populations. Any employer seeking workers is eligible for employer services.

Services/Program Support: Services include job search and placement assistance for job seekers, recruitment services and special technical services for employers, re-employment services for unemployment insurance claimants, labor exchange services for workers who have received notice of permanent or impending layoff, and development and the provision of labor market and occupational information. The Employment Service also administers the work test for unemployment insurance claimants.

Non-federal Funds: There is no state matching requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Employment Service staff can play an important role in guiding people toward jobs and toward education and training organized around career pathways through a range of one-on-one assistance and group services, including:

- Counseling and career planning,
- Testing and assessment,
- Job search assistance, and
- Recruitment, job matching, and placement.

Employment Service staff can help identify local employer partners, such as those that offer high-wage opportunities in established career pathways. The Employment Service typically works with employers to identify employment opportunities, match qualified job seekers with openings.

The **Wisconsin** Department of Workforce Development has taken steps to ensure that every local workforce area has at least one certified employment counselor to provide career counseling to clients. In Wisconsin, Comprehensive Job Centers house Workforce Investment Act (WIA) services and programs as well as the Employment Service and vocational rehabilitation and veterans services, among other programs. This new policy, coupled with other changes made under the umbrella of the state's Regional Industry Skills Education (RISE) initiative, strengthens the use of public workforce resources for career pathway and career pathway bridge models. These policy changes include adding career pathway training models such as apprenticeships, bridges, and chunked career pathways training in targeted occupations to the state's Eligible Training Provider List; requiring all workforce development boards to include RISE career pathway principles in training programs that are outlined in their WIA local

plans; and reviewing and revising the Wisconsin Technical College System occupational program development standards and procedures to better support career pathways.

PROGRAM LIMITATIONS

- Employment Service resources that may be available to support career pathways are mostly staff and service resources, not financial resources to pay for education and training. For example, staff can provide employment services and can offer intensive counseling services to people interested in career pathways. However, the program cannot support participants in education, skill, or occupational training.

OPPORTUNITIES FOR STATES

- Employment Service staff can provide counseling to guide people toward established career pathways.
- Online state job banks can help job seekers learn about employment opportunities and employers in regional career pathways.
- Employment Service staff may be able to provide labor market information on industries and occupations in specific regions to help inform the development of career pathways.

Workforce Investment Act Title II: Adult Education and Family Literacy Act

Overview: The Adult Education and Family Literacy Act (AEFLA; Title II of the Workforce Investment Act) provides states with funding for a variety of services to help adults develop basic skills such as reading, writing, math, English language competency, and problem solving. The adult education and English language services it supports can open doors to career pathways programs for those whose low skills or limited English might otherwise keep them out.

Type of Program: Formula grants to states and localities. States must distribute 82.5 percent of their federal allocation to local providers, with the balance allotted for state leadership activities (12.5 percent) and administrative expenses (5 percent). States must have a competitive process for awarding local grants or contracts that provides “direct and equitable” access to federal adult education funds by all types of eligible program providers (e.g., school districts, community colleges, libraries, community-based organizations, and other public or private nonprofit entities).

Eligibility and Targeting: Eligibility is limited to adults who are at least 16 years of age and are not currently enrolled, or required to be enrolled, in high school. In addition, they must either lack a high school diploma or its equivalent or function below that level (even if the student has a high school diploma), or be unable to speak, read, or write the English language.

Services/Program Support: The Act’s three purposes are to assist adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency, to help parents support their children’s learning, and to help adults complete a high school education. The Act funds adult education and literacy services, including workplace literacy; family literacy programs; and English language services.

Non-federal Funds: States are required to provide at least a 25 percent non-federal match in order to receive federal dollars. The match may be cash or in kind.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

The federal adult education law places a strong emphasis on preparation for employment and for postsecondary education and training, which fits well with career pathway and career pathway bridge approaches. For example, it requires states to describe how adult education and literacy activities will be integrated with other adult education, career development, and employment and training activities in the state. And one of three core indicators of

performance in the law is “placement in, retention in, or completion of, postsecondary education, training, unsubsidized employment, or career advancement.”¹⁷

Federal law provides substantial flexibility on how adult education funds can be used for eligible individuals and allowable services. When academic and English language services below the postsecondary level¹⁸ are provided to adults as part of career pathway and career pathway bridges, this can shorten the timeline to post-

secondary credentials, increase transitions to further education, reduce costs, and decrease the need for developmental education. Specifically, federal adult education funds can be used to:¹⁹

- Support development of academic and English language components of career pathway and career pathway bridge programs, as long as the services are below the postsecondary level. This might include, for example, creating curricula that is contextualized to occupational pathways or seeding innovation of new delivery formats, such as dual enrollment, learning communities, and others.
- Fund operational costs of academic and English language services, below the postsecondary level, in career pathways and career pathway bridges. For example, federal adult education funds could fund an adult education instructor to teach the academic and English language portions of a bridge program that integrates basic skills and English language content with occupational training in a co-instruction format.²⁰
- Reward performance for achievement of goals beyond what is traditionally expected, such as setting state goals for postsecondary transition and credential completion by adult education students (beyond the federal ones) or setting goals for reducing the need for developmental education among adult education students who enter college.
- Provide support services to promote persistence in and completion of adult education and transitions to postsecondary education and training or employment. This might include helping to fund case managers who connect students with the resources needed to overcome academic and personal challenges to success.

Washington's Integrated Basic Education and Skills Training (I-BEST) program delivers adult education and occupational training using teams of faculty from each education sector to advance students along pathways that carry college credit and result in recognized job credentials. I-BEST initial pilot programs were funded by Workforce Investment Act (WIA) Title II leadership dollars (12.5 percent of funds), Carl D. Perkins Career

and Technical Education Act state leadership dollars, and general state appropriations. Local I-BEST programs are currently supported through state and federal adult education funds, student tuition, and an enhanced reimbursement rate of 1.75 per full-time equivalent student (FTE) for I-BEST enrollments. This enhanced reimbursement rate helps offset the additional costs of the I-BEST model.

Wisconsin's statewide career pathways initiative, Regional Industry Skills Education (RISE), includes career pathway bridge courses as the initial step in each pathway. Like I-BEST, these career pathway bridges combine basic academic, English language, and occupational content. Students receive college-level credit toward an approved occupational program and benefit from contextualized instructional strategies—like team teaching, labs, or simulations—and career development activities. State adult education funds initially supported these bridges; the state is currently expanding them with additional state resources and federal adult education and American Reinvestment and Recovery Act funds received from local Workforce Investment Boards.

Illinois uses state and federal adult education funds for career pathway bridges that contextualize basic academic and English language skills to occupations in three high-demand industry sectors: manufacturing, health care, and transportation/distribution/logistics. The state piloted this bridge model initially and is now implementing it statewide and working to connect the bridges to the 16 career clusters defined under the federal Carl D. Perkins Career and Technical Education Act. The goal of the Illinois career pathway bridge effort is to sequentially bridge the gap between the initial skills of individuals and what they need to enter and succeed in postsecondary education and career path employment.

FEDERAL FUNDS TO STATES

State leadership funds (12.5 percent of funds) can be used to:

- Develop and disseminate curricula,
- Create new service models,
- Provide professional development,

- Benchmark and reward performance,
- Provide technical assistance and/or develop evaluation standards to support implementation,
- Provide incentives for program coordination and integration,
- Coordinate adult education with existing support services, such as transportation and child care, and
- Integrate literacy instruction and occupational skill training, and promote linkages with employers.

States also can use WIA incentive funds, awarded for exceeding negotiated performance targets in WIA Titles I and II and Perkins Career and Technical Education, to support innovative programs consistent with the goals of any of the three programs. These funds have been used to support career pathway bridge efforts and career pathway initiatives.

FEDERAL FUNDS TO LOCAL PROVIDERS

Local funds must be used to establish or operate one or more programs that provide services or instruction in adult education and literacy services, including workplace literacy services, family literacy services, or English literacy programs. Local adult education/English literacy programs can partner with community colleges and vocational education providers to support the creation and implementation of career pathways and career pathway bridges. In addition, local providers can contextualize basic skills content and integrate basic skills with workforce education.

States and local programs must report adult education and English language student outcomes in the National Reporting System for federally supported students enrolled in career pathway bridges or career pathways, just as they do for other adult education students receiving federally funded services.

PROGRAM LIMITATIONS

- Local providers must use federal adult education funds to provide adult education and literacy services, including workplace literacy services, family literacy services, or English literacy services. These services must be below the postsecondary level.

- States cannot commingle adult education funds and those from separate funding streams. They can, however, use Title II funds in conjunction with other funds. For example, states can use Title II funds to support the basic skills and English language components of career pathway and career pathway bridge approaches.

OPPORTUNITIES FOR STATES

Given their flexibility and given the competitive process for awarding local funds, states can use federal adult education funds strategically to support career pathways and career pathway bridges for lower-skilled adults and out-of-school youth. States can use these funds to:

- Contextualize academic content to specific occupations and career pathways.
- Dual enroll students in adult education/English language services and postsecondary education and training, with the adult education funds covering the services below the postsecondary level, including the adult education/English language portion of the educational program, as well as related supports.
- Align curricula and assessments across adult education, postsecondary education, and job training programs.
- Create new delivery models, such as co-instruction and integrated academic and occupational curricula, for helping students speed their progress through college and career pathways.
- States can also create incentives for local programs to focus on preparation for and success in postsecondary education by offering enhanced funding for career pathway bridge and transition models — as Washington has done with I-BEST — and setting targets for improvements by local programs on the transition and success rates of adult education students in college and career pathways.
- States may also want to consider the ways in which state funds beyond the required state match, if accounted for separately, funds can be used to support career pathway and career pathway bridge efforts in even more flexible ways.

Pell Grant

Overview: The Pell Grant Program, authorized by Title IV of the Higher Education Act, is the largest federal grant program supporting postsecondary education and training for low-income students. It distributes need-based awards through postsecondary institutions to help students with the costs of attendance including both direct costs, such as tuition and fees, and indirect costs, such as living expenses.

Type of Program: Grants to individuals via the higher education institution they attend.

Eligibility and Targeting: Both students and educational programs must meet specific eligibility criteria. Pell Grants are targeted to lower-income students enrolled in programs that result in a certificate or degree. (For more detailed eligibility information, see section on how Pell Grants can support career pathways and career pathway bridges.)

Services/Program Support: For students enrolled in eligible postsecondary programs that lead to a certificate or degree, Pell Grant funding can cover tuition, fees, housing and food expenses, books and supplies, transportation, and child care. Pell Grants can cover up to a year of remedial coursework if the student has been admitted to an eligible program and the remediation is part of or required for that program.

Non-federal Funds: Pell Grants are wholly funded by the federal government, and there is no matching requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

States and local institutions have few, if any, opportunities to make policy that *directly* affects how Pell Grant funding is used because funding flows directly from the federal government to the student via the educational institution the recipient attends, and student and institutional eligibility standards are determined by federal law. However, states and institutions can adopt policies and practices that expand the number of students and educational programs that are eligible for student aid. Pell Grants can help ensure that lower-income students have access to career pathways. States and local institutions can raise awareness about the availability of Pell Grants to pay for tuition and other expenses related to

participating in an eligible career pathway. States can work with postsecondary institutions to design career pathway and career pathway bridge offerings to make as many components Pell-eligible as possible. If a component cannot be designed as Pell-eligible, states and postsecondary institutions should consider how to support it with complementary funds from other sources.

Students must meet individual eligibility criteria and must also be enrolled as a regular student in a certificate or degree program that itself meets Pell Grant eligibility criteria. Students are eligible for Pell Grants if they:

- Demonstrate financial need,
- Are a U.S. citizen or eligible non-citizen,

- Have a high school diploma or GED. If a student does not have one of these credentials, the student can demonstrate his or her “ability to benefit” from the program in one of two ways: (1) pass an ability to benefit test (see the Office of Postsecondary Education’s website for a list of approved tests); or (2) complete six postsecondary credits in a degree or certificate program with a C average or better (the student can receive federal student aid after completing these credits, but not during),²¹
- Have resolved any issues related to drug convictions,²²
- Are not in default on a federal student aid loan; if the student owes an overpayment on a federal student aid grant or loan but has made a repayment arrangement for the default or overpayment, the student is eligible,
- Maintain “satisfactory progress,” which requires students to maintain a minimum grade point average and to complete a certain percentage of courses attempted each semester. In addition, maintaining satisfactory progress also requires achieving the number of credits needed to a postsecondary certificate or degree program within 150 percent of the time normally required for completion (e.g., three years for a two-year associate degree program, adjusted for enrollment status), and
- Have not completed the requirements for, or received, a bachelor’s or professional degree.

Pell Grant amounts vary according to the student’s expected family contribution, which is dependent on student and family earnings, the cost of attending the institution, whether the student attends full-time or part-time, whether the student attends for a full academic year or less, as well as other factors. According to the U.S. Department of Education, the maximum Pell Grant scheduled award for a full-time student for the full academic year 2010-11 (7/1/10-6/30/11) is \$5,550. Awards are prorated based on enrollment status and length of the period of attendance. The average award for 2010-2011 is expected to be approximately \$3,865. Pell Grant recipients typically come from very low-income families, with most having household incomes under \$30,000 (and more than half from families with income under \$20,000).

Certificate and degree programs are generally eligible for Pell Grants if the program meets all of these criteria:

- Is offered by an eligible public or private nonprofit institution of higher education or proprietary or postsecondary vocational institution. This generally means that the institution has legal approval from the state and is accredited or meets an alternative to accreditation, as well as certain other requirements,
- Is a degree program or a certificate program at least one year long, resulting in gainful employment or, for certificate programs shorter than one year, is on the institution’s list of federally approved non-degree programs (the Eligibility and Certification Approval Report or ECAR). To be eligible for Pell Grants, these shorter certificate programs must be at least 600 clock hours, 16 semester or trimester hours, or 24 quarter hours long and offered over at least 15 weeks of instruction, and
- Is an accredited program approved by the state (unless the accrediting agency and/or state do not regulate that type of program).

Some states and institutions have worked to ensure that students can earn “milestone credentials” within career pathway programs that are eligible for Pell Grants. For example:

In **Indiana**, Ivy Tech Community College has made a concerted effort to make shorter-term (less than one year) technical certificates eligible for student financial aid, and has already received approval for 22 certificate programs. In addition to designing programs according to the eligibility guidelines, the process required Ivy Tech to gain approval from its accreditation body (the Higher Learning Commission), the Indiana Commission for Higher Education, and the U.S. Department of Education. Each certificate program is made up of courses that are also part of an associate degree program, so students can gain credit toward an associate degree if they choose to continue their education. Ivy Tech Community College is one of the few community colleges to have focused on gaining approval for numerous shorter-term technical certificate programs.

The **Arkansas** Career Pathways Initiative (CPI) includes four key components: (1) clear pathways of continuing education and employment, (2) innovative instructional strategies aimed at improving student retention and completion, (3) comprehensive student support services, and (4) strategic partnerships.²³ CPI is funded entirely through the state's Temporary Aid to Needy Families (TANF) program. However, program staff helps participants apply for Pell Grants and other student aid to augment CPI funds (students use financial aid funds to cover tuition, fees, and other costs of attending before accessing CPI funds).

Since 2004, **Oregon's** Career Pathways Statewide Initiative has aimed to “transform Oregon's education systems to focus on helping youth and adults attain degrees, certificates, and credentials that lead to demand occupations, increased wage gain, and lifelong learning.” Oregon's community colleges, in partnership with the state's high school Career & Technical Education Network, Oregon University System, Employment Department, and Workforce Investment Boards have launched 150+ Career Pathways Certificates at the 17 community colleges. Community college financial aid directors have approved financial aid guidelines for Career Pathway Certificates. In general, Career Pathway, Less Than One Year (LTOY), and other stand-alone 12- to 44-credit certificate programs are not eligible for student aid. However, Career Pathway Certificates & LTOY Certificates are considered “momentum points” in student progression toward the aid-eligible course of study. Students who are enrolled in a course of study that is eligible for financial aid, such as an associate degree, can also earn a Career Pathway Certificate, LTOY, or other stand-alone certificate as they complete the required coursework on the way to attaining an aid-eligible credential or degree.²⁵

PROGRAM LIMITATIONS

Pell Grants can cover a wide range of expenses related to postsecondary education and training; however, there are some limitations:

- Students must meet all eligibility criteria described above.
- Educational programs must meet all eligibility criteria described above.

- Postsecondary institutions must be eligible to distribute federal Title IV student financial aid.
- Students who have been convicted of a drug-related crime while receiving student aid or who have defaulted on federal student loans can be temporarily or permanently disqualified from receiving a Pell Grant.
- Although students can theoretically apply for student financial aid at any time, student aid is generally applied for and distributed in semester-based cycles (based on terms or other payment periods for clock-hour and non-term-credit-hour programs). Students who apply too late in the cycle may miss out on limited grant funding. Also, it can take several weeks from the time of application for a student to begin receiving aid, so students and programs must plan ahead.
- There is a limit on how many Pell Grant awards a student can receive. All students who first received a Pell Grant on or after July 1, 2008, may receive Pell Grants for up to 18 semesters or the equivalent. This means students can receive no more than nine scheduled awards; this is prorated for part-time students. (The limit does not apply to students who received their first Pell grant before July 1, 2008.)
- Remedial courses are Pell-eligible if the student is accepted into an eligible program and takes remedial coursework within that program. Up to one academic year's worth of these courses can be counted in the student's enrollment status for federal aid. For the purpose of this limit, that is 30 semester or trimester hours, 45 quarter hours, or 900 clock hours. English as a Second Language courses do not count against the one-year limitation on remedial coursework, and they need not be at the secondary school level.

OPPORTUNITIES FOR STATES

- Work with financial aid administrators to structure career pathways and career pathway bridges so they are eligible for Pell Grants. Pay particular attention to program length and intensity.
- Ensure that low-income students seeking to enroll in credit-bearing career pathways programs apply for

Pell Grants to cover tuition and other expenses.

Assess how much Pell Grant funding can be expected for career pathways.

- Provide state leadership in helping colleges coordinate multiple funding streams and sources of student aid, e.g., Pell Grants, WIA Title I funding, TANF dollars, in order to offer more comprehensive funding packages to help students cover the entire cost of attendance, including tuition and fees, living expenses, and student supports, such as child care and transportation. This is especially important if a college opts for the alternative to the ability to benefit test in helping students qualify for federal student financial aid.
- Maximize federal need-based financial aid in conjunction with state aid programs.
- Provide state leadership in helping colleges to be more assertive in gaining aid eligibility for qualifying shorter-term certificate programs. Provide professional development for college financial aid officers, faculty, and staff.

Carl D. Perkins Career and Technical Education Act

Overview: The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) supports secondary and postsecondary programs that build the academic, career, and technical skills of young people and adults. The majority of funding is distributed through Title I of Perkins IV, which supports activities for both youth and adults. Title II of Perkins IV supports Tech Prep, an educational model that articulates secondary and postsecondary career and technical education (CTE) in a multiyear program in such areas as engineering, technology, applied science, health, and applied economics. States may consolidate resources available under both Title I and II funding streams.

Type of Program: Formula grants to states, with state flexibility to determine the allocation of funds between secondary and postsecondary institutions. States must direct at least 85 percent of funds to secondary and postsecondary institutions, which may include area career and technical education schools, technical colleges, and community colleges. These funds can be used to support critical components of career pathways initiatives, including curriculum development, program development, and support services. The remaining 15 percent can fund state administrative and leadership activities.

Eligibility and Targeting: Institutions that receive Perkins IV funds must ensure access for special populations who face difficulty in attaining education and employment. Under the 2006 Act, special populations are defined as:

- Individuals with disabilities,
- Individuals from economically disadvantaged families, including foster children,
- Individuals preparing for nontraditional fields,
- Single parents, including single pregnant women,
- Displaced homemakers, and
- Individuals with limited English proficiency.

Services/Program Support: Perkins IV funds can be used to develop CTE programs and curricula, including a multiyear sequence of courses known as a program of study; develop programs for special populations; provide mentoring and support services for CTE participants; upgrade or adapt equipment designed to strengthen academic and technical skill achievement; and provide professional development opportunities to teachers, administrators, and career guidance and academic counselors.

Non-federal Funds: States must maintain non-federal spending on career and technical education at the same level as in prior years. States must also match funds spent on state administrative (but not state leadership) activities, using non-federal sources.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

Perkins IV can support key components of career pathways initiatives and can be used to drive development of new pathways that lead to jobs in vital economic sectors. Funds also can be used for initial development and support of the CTE components of career pathway bridge initiatives, typically in coordination with other funding sources.

The 2006 reauthorization of the legislation requires local recipients of Perkins IV funds to offer at least one program of study as an essential part of their CTE offerings. A program of study is a multiyear sequence of courses, similar to a well-defined career pathway, in a career and technical content area that:

- Includes academic and CTE content in a non-duplicative progression of courses,
- Combines secondary and postsecondary program elements,
- May allow for dual or concurrent enrollment in a postsecondary program, and
- Leads to an industry-recognized credential or certificate at the postsecondary level or to an associate or baccalaureate degree.

Programs of study under Perkins can be thought of as career pathways intended to move secondary students towards a postsecondary credential and/or the baccalaureate level. A program of study can be structured in different ways, e.g., as a component of a career cluster, a career academy, a Tech Prep program, or a small learning community. In some states, programs of study are designed to have multiple entry points, including opportunities for adult learners.

Resources reserved as state leadership funds (10 percent of total allocation) are required to fund selected activities, which include developing, improving, or expanding the use of technology in CTE; supporting partnerships among local institutions, adult education providers, and other entities; and providing professional development opportunities for CTE teachers and faculty. In addition to these required activities, allowable uses of these funds include supporting new CTE

courses and initiatives, improving career guidance and academic counseling, and developing and enhancing data systems so that states and institutions can track academic and employment outcomes for CTE students.

Perkins IV funds distributed to local institutions (85 percent of total allocation) are required to be used for a range of activities, including provision of activities that prepare special populations for high-skill, high-wage, or high-demand occupations; development of quality CTE programs; and enhanced use of technology in CTE programs. Local recipients may use funds for critical implementation activities, such as provision of mentoring and support services, expansion of flexible delivery formats that make CTE accessible to all students, and development or improvement of new CTE courses. Perkins IV funds also may be used to provide direct assistance to special populations participating in CTE activities, including dependent care, transportation, books, and supplies, provided that the assistance supplements what is available from non-federal sources.²⁴

In **Washington**, Perkins leadership funds were instrumental in the development of I-BEST, a career pathway program for low-skilled or limited English proficient adults that contextualizes and integrates basic skills education with occupational training and results in college credit and an occupational certificate. Leadership funds supported ten I-BEST demonstration projects in 2004-2006 and have been used over the years to support I-BEST professional development opportunities. In addition, the state has established expectations for all Perkins programs that include meeting the unique needs of adult learners by ensuring that course requirements and necessary skill sets required for obtaining entry into the workforce are well defined and understood.

Ohio's new five-year plan for Perkins IV includes the shift of three percent of Perkins Title I funding from secondary to postsecondary institutions to support activities geared towards supporting student success and improving a student's likelihood of earning a credential. The state intends for institutions to use this funding to identify learning needs and provide appropriate interventions for students vulnerable to dropping out

of high school and those students who need assistance with re-entry into the education system.

As part of the Shifting Gears Initiative, **Illinois** is using lessons learned from Perkins IV programs of study to inform the development of career pathway bridges for adults and youth, including pathways to postsecondary education and employment for low-skilled adults.

PROGRAM LIMITATIONS

- Federal dollars may be used for the delivery of prerequisite courses; however, the 2006 legislation specifically excludes funding of prerequisite courses that are remedial. Any course funded under Perkins IV also must meet all parts of the new definition of CTE.
- Perkins IV funds may be used to support the CTE component of a career pathways bridge initiative. Additional federal, state, and local resources, such as adult education and literacy funds, should be used to provide basic skills instruction and other elements of the career pathway bridge initiative.

OPPORTUNITIES FOR STATES

The flexibility under Perkins IV provides ample opportunities for states to build new or expand existing career pathway and career pathway bridge initiatives, including:

- Align programs of study and overarching career clusters with the workforce and skill needs of regional employers.
- Use program approval authority to drive the development of programs of study and ensure program access for adults as well as for young people.
- Collect outcome data for adults participating in CTE programs to track adult educational and labor market transitions.
- In conjunction with other federal and state funds, use state leadership funds to initiate career pathway bridge initiatives.

- Use the authority under the reserve (which may consist of up to 10 percent of funds that are distributed to local institutions) to award grants to secondary and postsecondary institutions.
- Support partnerships involving local schools, postsecondary institutions, and adult education providers to focus on successful transitions, with attainment of academic, career and technical skills.

Temporary Assistance for Needy Families

Overview: Temporary Assistance for Needy Families (TANF) is more than a cash assistance program. It is a block grant providing flexible funding to states to support a wide range of activities. Almost all components of career pathways strategies can be reasonably justified as promoting the second statutory purpose of TANF, which is to “end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.”

Type of Program: Block grants to states.

Eligibility and Targeting: Most benefits and services are limited to low-income families with children. States set the income criteria, which may vary for different services. Some activities aimed at out-of-wedlock pregnancy prevention and at marriage promotion are not restricted to such families.

Services/Program Support: TANF is a flexible funding stream that may be used in any way reasonably aimed at achieving one of the purposes of TANF, with few restrictions.

Non-federal Funds: States must continue to spend at least 75 percent of what they spent on Aid to Families with Dependent Children and related programs prior to creation of TANF (or 80 percent, if they fail to meet the TANF work participation requirements). This is known as the “maintenance of effort” (MOE) requirement.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

TANF and maintenance of effort (MOE) funds can be used for a wide variety of activities, including career pathway partnership and curricula development, the ongoing costs of providing education and training, and ongoing supportive services. Such services are not limited to recipients of cash assistance under TANF. The activities should be included in the TANF state plan, and the TANF support must be proportionate to career pathways participation by TANF recipients and/or other needy families with children. Federal Department of Health and Human Service (HHS) approval is not needed.

TANF places more restrictions on what activities can be counted toward the federal participation rate for recipients of TANF assistance.

- Participation in a career pathways program can reasonably be counted as either “vocational educational training” or “job skills training directly related to employment.”
- Basic education can only be counted as vocational educational training if it is a “necessary and regular part” of a vocational program. In the final rule implementing changes made by the Deficit Reduction Act of 2005, HHS explicitly rejected suggestions that a sequence of activities including intensive stand-alone basic education leading to a vocational program should be countable.
- Vocational educational training can count for all hours of a recipient’s participation requirement; however, it can only be counted for 12 months per recipient and there is a limit on the share of the caseload that can be counted based on this activity.

- Job skills training is only countable when combined with 20 hours per week of a “core activity,” such as subsidized or unsubsidized employment.
- In order to allow TANF recipients to participate in a career pathways program, states may want to consider allowing recipients to participate in educational activities even when they are not countable towards the federal requirements, or developing work-study programs and other ways for recipients to combine work and education in a way that supports career pathways participation.

Arkansas invests about \$12 million in federal TANF funds annually to help low-income parents earn credentials in career pathways at the two-year colleges across the state. The Arkansas Career Pathways Initiative (CPI) model provides a network of campus-based case managers at 25 campuses who assist low-income parents to persist in their studies. TANF funds also help defray a range of expenses related to parents’ participation, including tuition, child care, transportation, and other student support services.

Kentucky’s \$10.8 million Ready to Work (RTW) initiative helps TANF recipients succeed in community and technical college programs while helping the state meet its TANF work participation rate. In addition to getting help from college-based RTW coordinators at 16 colleges, students can earn additional income and gain work experience in TANF-funded work-study jobs. Through TANF-funded work-study, students can be placed in on- or off-campus jobs at either public or private sector places of employment. These work-study jobs also allow recipients to meet the core 20-hour-a-week federal work participation requirements, even after they have reached the 12-month limit on vocational educational training.

PROGRAM LIMITATIONS

- Participants must be members of “needy families,” meaning both that they must be in families with children and that they must be low-income (although the state may set the income criteria, and it can be higher than that established for cash assistance).
 - TANF funds may not be used to support generally available public education.
- Under TANF, states must meet a federal work participation rate with regard to recipients of TANF assistance. In most cases, funding career pathways programs will not trigger this participation rate requirement. However, transportation and child care provided to non-employed adults is considered to be “assistance.” If the families are not already receiving cash benefits, this can trigger time limits, participation rates, and data reporting requirements.
 - The main barrier to the use of TANF funds to support career pathways is that TANF is a fixed block grant, and the allocations have not been adjusted for inflation since 1996. As most states have already committed their allotments to other activities, increasing spending in one area often requires cuts in other areas.

OPPORTUNITIES FOR STATES

- TANF funds are a flexible source of funds that can be used to support career pathways activities. States should examine their current spending under TANF to see whether there are unobligated funds available or if some existing activities should more appropriately be supported with other sources of funds.²⁶
- State funds spent on career pathways may also be countable towards the TANF MOE requirement, to the extent that they benefit needy families and are new spending (compared to 1995 levels). “Excess” MOE spending beyond the amount required may be used to reduce the effective work participation rate requirement.
- States should also consider strategies to expand access to education and training for TANF recipients. One key policy is to allow participation in educational activities to count towards state requirements (even when not countable toward federal rate). States should also be sure to define the countable activities—vocational education, job skills training, and education related to employment—to include career pathways components and to develop work-study programs and other ways for recipients to combine work and education.

Supplemental Nutrition Assistance Program Employment and Training

Overview: Supplemental Nutritional Assistance Program Employment and Training (SNAP E&T; formerly known as Food Stamps Employment and Training or FSET) funds can be used to support a variety of education, training, employment, and related services for SNAP recipients. Federal administration of the SNAP E&T program is housed within the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA).

Type of Program: Grants to states and federal reimbursement to states. The SNAP E&T program includes two main types of funding: (1) 100 percent federal funds and (2) 50 percent federal reimbursement funds. Under the first, each state is given a capped allotment of 100 percent federal funds to provide SNAP E&T services (other than participant reimbursements). This allotment is very low compared to the total number of potentially eligible SNAP recipients, and in many states is entirely consumed by job search activities and referrals to education and training that are funded from other sources. States can also qualify for additional 100 percent federal funds if they commit to serving all unemployed childless adults who would otherwise be at risk of losing SNAP benefits due to the time limit.

Under the second component, states can claim 50 percent reimbursement for non-federal spending on SNAP E&T activities. This is not capped. In order to draw down these funds, states must include a description of these activities and a proposed budget in a SNAP E&T plan. The plan must be approved by the FNS at USDA. FNS is planning to release a toolkit on SNAP E&T in late 2010 or 2011 with clarified guidance on using the program.

Eligibility and Targeting: Participants must be recipients of SNAP benefits, and not Temporary Assistance for Needy Families (TANF) recipients. In general, SNAP recipients must have gross monthly income under 130 percent of the federal poverty level and have assets under defined limits. In some states, services are further targeted to “able bodied adults without dependents” who are at risk of losing SNAP eligibility if they are not participating in a work-related activity. Some states impose additional target criteria, such as geographic regions.

Services/Program Support: SNAP E&T funds can support operating costs of education and training programs, support services for participants, and retention services for up to 90 days.

Non-federal Funds: States receive a limited allotment of 100 percent federal funds, and must provide a match to receive the 50 percent federal reimbursement funds. Third party expenditures may be claimed as state spending for this purpose, contingent upon approval by FNS.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS AND CAREER PATHWAY BRIDGES

SNAP E&T supports education and training activities for SNAP (Food Stamp) recipients, and is quite flexible regarding the types of programs. SNAP E&T can pay for the costs of operating education and training programs, including basic skills instruction, as long as the program or service is not available to the participant at no cost through another government program or private source. The federal government will share half the cost of reimbursing recipients for a wide range of expenses related to participation in a SNAP E&T component, including dependent care, transportation, uniforms, books, safety equipment, interview clothing, test fees, supplies, etc. In a new provision added by the Food, Conservation and Energy Act of 2008 (P.L. 110-234), SNAP E&T funds can also be used to provide job retention services for up to 90 days after an individual who received employment and training services under SNAP E&T gains employment.

In the past, states mostly claimed reimbursement for direct state and local expenditures under the 50 percent reimbursement funding stream, but in recent years, a number of states have developed processes to claim expenses incurred by community colleges and other not-for-profit organizations under contract to the state agency operating SNAP E&T (sometimes referred to as “third-party match” programs).

Washington has operated a third-party match SNAP E&T program since 2005. The non-federal funds spent on support services and tuition and fees for SNAP E&T students by community-based organizations are allowable expenses to claim the federal 50 percent reimbursement. Community colleges also have participated in this program; however, as of the writing of this version of the toolkit, FNS has asked Washington State to redesign its reimbursement funding model for community colleges to ensure that the only expenses submitted for reimbursement are ones that are consistent with what the general public or other federal, state, or local grants are charged. To be clear, expenses claimed for the SNAP E&T 50 percent reimbursement can include

tuition, mandatory student fees, or case management as long as these charges are consistently applied to other grants or charged to the general public. FNS does not allow reimbursement for expenses above and beyond what the general public or other grants pay, e.g., state funding to community colleges for instruction is not an allowable reimbursement expense.

Colorado is poised to scale up a pilot SNAP E&T third-party match program that started between the City of Denver and the Community College of Denver (CCD) three years ago. CCD counts as match toward the federal reimbursement the non-federal sources of funding that support SNAP E&T students enrolled in special programs that have a case management component or additional services not available to the general student population, such as intensive career exploration (students must also be enrolled in the state SNAP E&T program). Sources include foundation funds and college general funds that support the special programs as well any private scholarships that students use to pay for their education in the program. The programs include career pathways, e.g., in early childhood education, or career pathway bridge programs, e.g., ESL Transition and the Fast Start remedial bridge program. CCD received \$98,307 in reimbursements in the first year. Half of the federal reimbursement goes back to the general college fund to cover administration of the program as well as \$300 book vouchers for the students. The other half goes back to the special program that generated the reimbursement. In this way, programs can use this flexible funding to support typically hard-to-fund activities and expand participation to additional students.

PROGRAM LIMITATIONS

- Historically, SNAP E&T programs were designed primarily to provide an activity for participants who were unemployed and mandated to participate in a SNAP E&T program to maintain food stamp benefits; these programs have not necessarily been robust education and training offerings.
- Participants must be assessed for appropriateness and enrolled in SNAP E&T programs to receive ser-

vices and be counted toward the reimbursement; they cannot simply be assumed to be eligible for services based on SNAP receipt.

- Federal law requires that federal grant programs, including the SNAP E&T program, cannot be charged more for services than the general public pays. Therefore, when states are considering which expenses to claim for the 50 percent reimbursement, it is critical to ensure that these claimed expenses are consistent with what the public pays or what is charged to other federal, state, or local grants. Student tuition, mandatory student fees, case management, course books, transportation and child care are generally considered allowable expenses. It is not allowable to claim the amount of funding a state provides to an institution as a reimbursable expense.
- There is no statutory or regulatory limit on how long a SNAP E&T component may last, but it is clear that USDA thinks of the program as providing short-term skills training for unemployed individuals. However, P.L. 110-234 clarified that individuals may volunteer to participate for more than 30 hours a week. This flexibility allows SNAP E&T funds to be used for more robust education and training activities for individuals who are currently employed in low-wage jobs.
- FNS has been somewhat concerned by the increasing requests for reimbursements from states, and has rejected some of the state plans submitted by states, arguing that the services were too similar to those available for **free or at lower cost** to the general public, or that the state had not justified the proposed increase in spending.

OPPORTUNITIES FOR STATES

- The 50 percent reimbursement stream can be a significant and flexible source of federal funding. States are reevaluating the types of supports they would like to provide under these programs, and a few are offering more robust education and training offerings.
- SNAP E&T funds can be a valuable complement where TANF funds are used to provide services to low-income families with children, as SNAP E&T allows states to serve low-income individuals who do not have children.

ENDNOTES

- 1 U.S. Bureau of Labor Statistics (2010): <http://www.bls.gov/news.release/empsit.t04.htm>.
- 2 U.S. Bureau of Labor Statistics (2009): <http://www.bls.gov/news.release/ecopro.nr0.htm>.
- 3 Adair Crosley and Brandon Roberts. *Strengthening State Policies to Increase the Education And Skills of Low-Wage Workers*. Working Poor Families Project. 2007.
- 4 The Workforce Strategy Center has documented the disconnects in the systems; see *Building a Career Pathways System: Promising Practices for Community-College-Centered Workforce Development* for more information: http://www.workforcestrategy.org/images/pdfs/publications/promising_practices.pdf.
- 5 For more information on Wisconsin's Regional Industry Skills Education (RISE) initiative, visit <http://risepartnership.org>.
- 6 The Recovery Act includes a provision to allow local boards to contract directly with colleges or eligible training providers if the board determines it will facilitate training of multiple individuals in high-demand occupations and will not limit customer choice. This provision also is included in the FY 2010 Labor, Health and Human Services appropriations legislation.
- 7 See *DOL Training and Employment Guidance Letter (TEGL) 18-05* for more information about how WIA funds can support Incumbent Worker Training: <http://wdr.doleta.gov/directives/attach/TEGL18-05.pdf>.
- 8 A few states have already adopted this type of approach. For example, in Illinois, 40 percent of local funds must be spent on training services, and in Florida, 50 percent of local funds must be spent on ITAs.
- 9 For a guide to on-line self-sufficiency tools that have been used by employment programs to focus career counseling on longer term employment goals, see: <http://www.wowonline.org/ourprograms/fess/documents/WOWGuidetoOnlineSelf-SufficiencyToolsFinal.pdf>.
- 10 The authorization of the Trade Adjustment Assistance for Workers program is extended until December 31, 2010.
- 11 Lerman, Robert I. (2009). *Training Tomorrow's Workforce: Community College and Apprenticeship as Collaborative Routes to Rewarding Careers*. Center for American Progress: Washington, D.C. December.
- 12 *DOL Training and Employment Guidance Letter (TEGL) 2-07*. <http://wdr.doleta.gov/directives/attach/TEGL/tegl2007/TEGL2-07.pdf>.
- 13 Ibid.
- 14 State examples are from: Lerman, Robert I. (2009). *Training Tomorrow's Workforce: Community College and Apprenticeship as Collaborative Routes to Rewarding Careers*. Center for American Progress: Washington, D.C. December.
- 15 See *DOL Training and Employment Guidance Letter (TEGL) 2-07* for more information about creating stronger connections between Registered Apprenticeship and WIA: <http://wdr.doleta.gov/directives/attach/TEGL/tegl2007/TEGL2-07.pdf>.
- 16 For more information on the Wagner-Peyser Act, see chapter 2 in *Training Policy In Brief* by the National Skills Coalition (formerly The Workforce Alliance), published in 2007.
- 17 For a list of AEFLA provisions that support the advancement of individuals into postsecondary education and into further education and training, see *Use of Funds Provided Under the Adult Education and Family Literacy Act (AEFLA) for Integrated Education and Training (IET)*. U.S. Department of Education. June 8, 2010. <http://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/aeffa-funds-for-iet.pdf>
- 18 "Postsecondary level" is not defined in law; however, a common definition states use is 12.9 grade level.
- 19 For more information, see *Strengthening State Adult Education for Low Skilled Workers*. Amy Ellen Duke and Evelyn Ganzglass. (Summer 2007). <http://www.clasp.org/admin/site/publications/files/0384.pdf>.
- 20 See *Use of Funds Provided Under the Adult Education and Family Literacy Act (AEFLA) for Integrated Education and Training (IET)*. U.S. Department of Education. June 8, 2010. <http://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/aeffa-funds-for-iet.pdf>
- 21 This second option is an alternative to the ability to benefit test and was approved on August 14, 2008, when President Bush signed into law the Higher Education Opportunity Act, Public Law 110-315, which reauthorized the Higher Education Act of 1965. The U.S. Department of Education released proposed regulations for this alternative approach in the summer of 2010, which should be final in fall 2010. See Department of Education *Dear Colleague Letter GEN-08-12, FP-08-10* (2008), <http://ifap.ed.gov/dpclatters/attachments/GEN0812FP0810AttachHEOADCL.pdf> for more information.
- 22 A student is ineligible for federal financial aid if the conviction occurred while the student was receiving federal financial aid. The period of ineligibility depends upon the number and type of offenses. The student can regain eligibility by meeting certain requirements including completing a rehabilitation program.
- 23 See *The Arkansas Career Pathways Initiative: A New Model for Delivering Postsecondary Training to Adult Students* by the Southern Good Faith Fund (February 2008): http://www.gwdc.org/shifting_gears_initiative/Conceptual_Framework/The_Arkansas_Career_Pathways_Initiative.pdf.
- 24 Although the Oregon guidelines do not explicitly mention it, according to federal student aid guidelines, other aid-eligible programs of study can include credit-based certificate programs and short-term clock-hour certificate programs as defined in this summary.
- 25 For a full list of required and permissive activities that can be carried out with Perkins IV funds, see the legislation at http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=109_cong_bills&docid=f:s250enr.txt.pdf.
- 26 State by state information on use of TANF and MOE funds in 2009 is available at: http://www.clasp.org/resources_and_publications/publication?id=0808&list=publications.



1200 18th Street NW Suite 200
Washington, DC 20036