



**Comments
On
Title II
Workforce Innovation and Opportunity Act NPRM
RIN 1830-AA22**

The Illinois Community College Board appreciates the opportunity to comment on The Joint Rule proposals in the WIOA regulations. These comments are based on Regional Sessions held in the state with Adult Education, Career & Technical Education, and Community College representatives. In addition, some of the comments are also based on comments from the National Council of State Directors of Adult Education (NCSDAE).

The Illinois Community College Board is also grateful for the opportunity to provide feedback on the proposed regulations to implement the Workforce Innovation and Opportunity Act of 2014. As the member of the State of Illinois' WIOA Implementation Interagency Working Group responsible for programs under **Title II –Adult Education and Literacy (AEL) Act** of WIOA, we are pleased to submit the comments below on behalf of our partners.

The information below cites specific comments on The Joint Rule, NPRM - **RIN 1803-AA22** proposal.

**WIOA- Title II
RIN 1830-AA22**

463.24

- With regard to 463.24(c), we recommend adding: "An eligible provider that has not been previously funded under AEFLA should demonstrate the ability to improve the skills of the appropriate populations."
- In addition, we recommend adding "463.24(d) demonstrated effectiveness: "The state Title II eligible agency is responsible for defining how both current and new applicants are evaluated in the grant competitions in determining demonstrated effectiveness."

463.32

- With regard to 463.32(a), English Language Acquisition (ELA) standards are not yet aligned to ESEA standards in any state. Until this happens, we recommend that the citation be amended thusly: "(a) Have implemented State adult education content standards that are aligned with the State adopted standards under ESEA as described in the State's Unified or Combined State Plan and as evidenced by the use of a curriculum that is aligned with the State adult education content standards or as evidenced by instruction and instructional materials aligned with the State adult education content standards; or..."

- We also recommend, with regard to 463.31 and 463.32, that English language acquisition (ELA) be adopted as an umbrella term, allowing states to choose their own branding, whether they adopt ELA or choose to continue using English as a Second Language (ESL), English for Students of Other Languages (ESOL), or another pre-existing branding phrase.

463.33

- With regard to 463.33, we request clarification of the intent of integrated English literacy and civics education. Does this include all programs, and how do the core partners and some required partners serve as part of these activities?

463.37

- With regard to 463.37(a)(3), we recommend that the line be amended thusly: “Use occupationally or employability relevant instructional materials.
- We request clarification: will all programs, providing Title II services, required to provide integrated education and training services?
- We request that a clarification and stipulation be made that the provision of the occupational training portion of integrated education and training be facilitated through a cooperative agreement of training resources available through Title I providers, Ability to Benefit, and employers. All of these funding avenues must be utilized before accessing Title II funds in order to avoid undue expenditure of Title II funds on training activities and drawing away from instructional activities.

463.60

- With regard to 463.60 and programs for corrections education, we request clarification of career pathway services to be provided to the corrections population.
- We also recommend language that stipulates aligning services with correctional institutions which offer vocational training. Employers could be offered incentives for hiring previously incarcerated individuals who have gone through training and educational programs.
- We request recognition of the fact that, 1) not all institutions (e.g. jails) provide postsecondary credentials; and 2) helping inmates enter or advance within a specific occupation or occupational cluster is not possible in most situations.
 - We recommend that while negotiating performance measures regarding corrections education that recognition be made of the difficulty in serving this population.
- We recommend that non-regulatory guidance be provided for these issues.