

Upskilling adult learners with disabilities

How collaboration among adult education, vocational rehabilitation, and workforce development partners can strengthen systems

BY AMANDA BERGSON-SHILCOCK

Businesses throughout the United States are facing a tight labor market and a growing need for skilled workers. At the same time, millions of U.S. adults have foundational skills gaps in areas such as literacy or numeracy. This issue is especially acute among Americans with disabilities, who are twice as likely as their non-disabled peers to have less than a high school education.¹ Ensuring that these individuals have access to skill-building opportunities, including resources necessary to address their disabilities, will improve their career prospects and earnings. States can benefit from these Americans' talents by improving coordination among the major systems designed to serve them and implementing policies that take advantage of the expertise that each system has to offer.

This brief outlines how closer collaboration among adult education, workforce development, and vocational rehabilitation partners can advance effective practices and programs for workers with foundational skill needs and disabilities. It provides a case study of one such approach, and state and federal policy recommendations for strengthening alignment between these systems and replicating this approach in other communities.

36 MILLION
AMERICANS HAVE
SKILL NEEDS



LITERACY



NUMERACY



ENGLISH



DIGITAL SKILLS

24 MILLION ARE
ALREADY EMPLOYED



Demand for middle-skill workers creates opportunities for upskilling

The United States economy has strong demand for middle-skill workers, but there are not enough people whose skills are well-matched to those opportunities. National Skills Coalition's analysis of Bureau of Labor Statistics data finds that approximately 53 percent of all jobs in the United States are at the middle-skill level, requiring more than a high school diploma but not a four-year degree.² However, only 43 percent of U.S. workers are trained at the middle-skill level.

To close this gap, policymakers should invest in upskilling opportunities for Americans eager to improve their economic prospects – including people who are employed in frontline jobs and seeking to move up, as well as those who are just entering (or re-entering) the job market. In all, there are 36 million American adults who have literacy, numeracy, spoken English, or digital skill needs, and 24 million of these adults are already employed.³

Individuals with disabilities, in particular, would benefit from greater upskilling opportunities. In the United States, one in five adults with disabilities (21 percent) have less than a high school education, a rate twice that of their non-disabled peers. In addition, another 34 percent of adults with disabilities have only a high school diploma or equivalent.⁴ While simply having a disability of course does not prevent individuals from excelling academically, in some cases, undiagnosed or unaddressed disabilities may prevent people from acquiring skills during their K-12 education, or even completing their secondary education at all.

Increasing upskilling opportunities could help increase employment for people with disabilities. The unemployment rate for people with disabilities is regularly twice as high⁵ as it is for individuals without disabilities, despite the fact that nearly seven in ten people with disabilities want to work.⁶

Lack of systems alignment prevents progress

Two major federal systems are designed to address the challenges facing adults who have foundational skills gaps and/or disabilities: the adult education system and the vocational rehabilitation (VR) system. Both receive primary funding from the Workforce Innovation and Opportunity Act (WIOA), which provides Title II funds to support adult basic education, high school equivalency, and English language classes,⁷ as well as Title IV funds to support a host of pre- and post-employment services for people with disabilities.⁸

When working in tandem, complementary services under WIOA Titles II and IV can be a powerful mechanism for upskilling adult learners with disabilities. However, lack of coordination between these two systems is common across the United States. Often these services are *not* working in tandem, and/or eligible participants are not being enrolled in both types of services. Partners in each system often lack information about the specific services and eligibility requirements of the other title, making it difficult to assess when it is appropriate to refer an individual for additional services. Even when the need for a referral is identified, partners often lack standardized policies and procedures for making and tracking such referrals.

Beginning with the 2014 passage of the WIOA legislation, Congress has encouraged states to more closely coordinate services across WIOA titles, most notably through the unified planning process that all states must undertake every four years. However, despite this new federal emphasis, the experience of individual adult learners and jobseekers with disabilities on the ground can still vary greatly depending on whether they initially enter through the adult education or through the workforce development or vocational rehabilitation system, and how well that system is coordinating with its local and state counterparts in the other systems.



Improved systems-level coordination benefits people and communities

Solving this lack of coordination is vital for people and the communities in which they reside. At the individual level, adults with disabilities could more easily and effectively pursue upskilling opportunities and advance their careers if these systems coordinated more effectively. For example, adult learners who have undiagnosed disabilities could access diagnostic testing through the VR system. The results of such testing can in turn unlock access to VR funding for adaptive technology or other resources necessary to meet their employment goals. Conversely, people with disabilities who have foundational skills gaps and an identified career goal could access adult education programs such as Integrated Education and Training (IET) that are specifically designed to help them build skills and train for a specific occupation or industry.

At the community level, better systems alignment can lead to more efficient use of public funds by streamlining referral processes, clarifying roles, and reducing duplication of services. These improved operational efficiencies, combined with a more strategic use of the complementary strengths of each system, can then equip communities to more effectively accomplish their WIOA-mandated goals for educational attainment and employment.

In addition, there is a strong economic payoff to helping people build their skills and obtain better employment. A report from the Organization for Economic Cooperation and Development (OECD) calculates that each year of postsecondary education leads to an increased per capita output of between 4 and 7 percent.⁹ This payoff is especially valuable in the case of adults without high school credentials who are able to access IET programs or similar upskilling opportunities that allow them to complete their secondary education and earn a postsecondary, industry-recognized credential. Communities that align their WIOA-funded services to boost enrollment and success in IET programs can benefit from this economic boost.

This brief highlights how Texas has approached the systems alignment process. It includes a case study with examples from the state, followed by recommendations for how other state and federal policymakers and advocates can improve alignment and outcomes in their own communities.

Understanding the landscape: Federal investments in adult education and vocational rehabilitation

Adult education is an umbrella term generally referring to adult basic education, adult secondary education, and English language acquisition programs. The primary federal investment in adult education is Title II of the Workforce Innovation and Opportunity Act (WIOA), also known as the Adult Education and Family Literacy Act. Nationally, WIOA Title II provides approximately \$600 million in funding serving 1.5 million adult learners each year. Funding is distributed through a state's designated agency (typically the state department of education or labor, or other higher education agency) and then re-granted to a wide variety of entities, such as school districts, community colleges, nonprofit community-based organizations or other eligible adult education providers. In contrast, WIOA Title I provides roughly \$2.7 billion in funding for employment, workforce development, and occupational training services, which are provided through a standardized national infrastructure of state and local Workforce Development Boards and one-stop career centers known as American Job Centers.¹⁰

Vocational rehabilitation (VR) services are intended to assist people with disabilities in preparing for, obtaining, retaining, or advancing in employment. VR is funded through Title IV of WIOA, which provides \$3 billion in state formula funding each year.¹¹ Funding is allocated by the U.S. Department of Education to designated state agencies. To be eligible for VR services, an individual must have a physical or mental impairment, which—for that individual—results in a substantial impediment to employment and requires VR services to achieve an employment outcome. VR services may include diagnostic testing; career counseling; job search, placement, and retention; education and training services (including tuition, books, and supplies); assistance with obtaining adaptive technology necessary for employment; and assistance with occupational license fees, tools, and equipment. The primary goal of these services is for individuals to achieve competitive integrated employment – that is, placement in a job that compensates workers at the same rate of pay as comparable workers without disabilities, affords them similar opportunities for career advancement, and provides similar opportunities to interact on the job with people who do not have disabilities.

Alignment in action: Rural Capital area

The Rural Capital area encompasses a so-called doughnut of nine counties surrounding Austin in Central Texas. The region's population has grown rapidly, increasing 40 percent over the past ten years to just under 1 million people today. Most residents are non-Hispanic white (60 percent) or Hispanic¹² (29 percent), with far smaller percentages of Black and Asian residents. The sprawling geographic reach of the area and the scattered, somewhat piecemeal distribution of community colleges serving its residents have helped galvanize local workforce and education officials to identify creative opportunities for partnership between their systems to meet local workers' upskilling needs.

Since 2016, leaders from Rural Capital's adult education, vocational rehabilitation, and workforce development systems have been meeting regularly to develop a shared process for improving outcomes for adult learners and workers through better systems alignment. A key impetus for the effort was the recognition that individuals with disabilities and other adult learners and job seekers faced an uneven and sometimes ineffective path to accessing necessary education and training services. The sustained, in-depth collaboration undertaken by the partners in response illustrates local leaders' wholehearted embrace of systems alignment as a tool for program improvement. Their willingness to persist through the inevitably bumpy process

of establishing new shared protocols and procedures has paid off in a smoother, more seamless process of providing services to these individuals. The number of "integrated referrals" among the adult education, vocational rehabilitation, and workforce development partners has grown rapidly since the collaboration began, to serve nearly 350 individuals in the most recent program year.

One specific avenue through which the Rural Capital partners have deepened their collaboration is Integrated Education and Training, a model that epitomizes how WIOA titles can collaborate to improve outcomes for jobseekers with foundational skills gaps, including those with disabilities.¹³ Rural Capital has embraced the IET model, and the local adult education provider, Community Action, now offers ten different IET programs in various in-demand occupations. Adult education leaders use the local workforce board's high-priority occupations list to identify potential occupations, and then collaborate with their workforce system partners to design each IET program. Local employers provide input into curriculum development and program design.

Ensuring availability of IET programs through community-based organizations such as Community Action is especially important given that there is no single community college serving the Rural Capital region – seven different colleges serve some portion of the far-flung area.

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This fragmentation can make it challenging for individuals to access college-based training programs close to home, especially if they face transportation problems. The availability of IET programs under Title II has also helped Rural Capital's VR partners to understand the full breadth of local career training opportunities potentially available to their jobseekers – beyond simply the high-school equivalency classes that the adult education system is well-known for providing, and beyond the community college-based programs that may or may not be geographically accessible.

While Rural Capital partners were responding to motivations at the ground level, policy changes at the state level added fresh urgency to their systems alignment efforts. In 2015, the Texas Legislature passed a law¹⁴ moving the state's VR system under the umbrella of the Texas Workforce Commission (TWC). State adult education leaders – whose program was already housed in TWC – immediately identified the new legislation as a potential lever to improve WIOA Title II alignment with Titles I and IV. Officials decided to use a portion of their federal Title II adult education state leadership funds to support system integration, via grants to local workforce boards. Rural Capital partners soon took advantage of the opportunity to strengthen system integration, using their \$30,000 grant from TWC to hire an outside facilitator who could guide their nascent partnership.

Both local and state stakeholders saw the same challenge: Evidence suggested that adult education and VR systems had a shared customer population, yet those individuals were not always receiving the full range of services available to them. The stakeholders also envisioned the same solution: Developing better policies and procedures, as well as data systems, to facilitate referrals between Titles I, II, and IV and track individuals' progress across the systems. Cross-training for staff would also be vital to ensure that case managers, instructors, and others were knowledgeable about one another's services and eligibility requirements, and equipped to make appropriate referrals.

As Rural Capital's work got underway, stakeholders made a crucial decision: Rather than focus merely on a high-level Memorandum of Understanding or only on ground-level decisions, they would instead design a structured, facilitated process that would respond to emerging developments and provide room to develop policies that supported practice and vice versa.

Through regular monthly discussions facilitated by their TWC-funded consultant, the Rural Capital partners put their approach to the test in developing a shared understanding of the specific difficulties and bottlenecks in the

existing referral process. Partners then worked together to develop new processes and a simple data system to support cross-program referrals. The work was iterative. At first, referral information would simply be e-mailed back and forth among the various partners. But with each agency creating its own spreadsheets for tracking purposes, the situation quickly became complicated. To resolve it, one staffer created a simple database that served as a referral log, allowing any partner to enter brief information about a new customer into the system and trigger appropriate next steps on a referral.¹⁵

Intensive professional development activities were key to building deep programmatic understanding of each partner's resources and limitations. The partners were unafraid to tackle sensitive issues; when they discovered that one factor preventing referrals was adult educators' unfamiliarity with how to identify when a learner had a disability, they took advantage of the TWC-funded statewide adult education professional development system (and its trainers' expertise) to help adult educators learn more about the VR system. Rural Capital's own VR agency also trained their adult education peers on how to conduct a "diagnostic conversation" to understand whether learners have a disability. Helping frontline staff understand what law and policy require turned out to spark an important shift; some staff had been under the mistaken impression that it was inappropriate to even ask if a person had a disability.

The results of this determined collaboration soon began to pay off, as partners were able to assess the slow but steady growth of cross-system referrals and services to shared customers. The new alignment positioned each system to help the other better achieve their desired outcomes, such as by permitting job seekers with disabilities to access VR funding to help pay for an adaptive device necessary to succeed in an IET class and find employment. Having a formalized partnership also allowed room for Rural Capital stakeholders to voice challenges they were encountering and see if other partners could help address them. For example, some rural counties had been struggling to retain youth participants in their programs. VR partners were able to provide funding for a paid work experience for youth, and the counties saw participation increase as youth from the VR system were referred to their program.

Today, while partners have institutionalized key practices and systems, they also continue to tinker with their process, meeting regularly and drawing on their now-firmly-established relationships to identify the potential for new collaboration in pursuit of improved outcomes for their shared customers.

From unemployment to AutoCAD drafter: A collaboration success story

After being laid off from a staffing agency, a worker with disabilities named Adam attended a reemployment orientation at a Rural Capital Area Workforce Solutions office. Staff there enrolled Adam in WIOA Title I services so that he could receive assistance with his job search, and because he was interested in pursuing training.

Since the type of training Adam was seeking was not a WIOA-approved target occupation, the workforce agency staff also referred him to the Vocational Rehabilitation program for possible training assistance. Adam was subsequently enrolled in VR and began training in an Engineering Computer Aided Design (CAD) program at Austin Community College.

During his training, Adam was co-enrolled in both WIOA Title IV (VR) and Title I (workforce) services, and he received joint case management from the two programs. The workforce agency paid for his transportation and housing assistance, while VR covered the costs for his tuition and training materials. Adam ultimately received a

certificate in Engineering Computer Aided Design, as well as the President's Honor Award for his academic success during training.

Upon Adam's completion of training, workforce agency staff assisted him with job search activities, workshops, resume preparation, and interviewing skills. Eventually, Adam successfully secured employment at AeroTek Inc. and was assigned to Urban Cable Construction as an AutoCAD Drafter, making \$19 per hour in a full-time position.

One workforce staffer reflected on the experience: "The whole center had a part in Adam's success story. This was our first co-enrollment with Vocational Rehab.... Every staff person in the resource room assisted Adam with his job search [at some point] during the time he was in the program. I know the support and understanding he received from all center staff helped him reach his goals. It was indeed a real learning experience for me and I actually have a better understanding about Adam's special condition and VR. I spoke to Adam today and he was on his way to work, still doing the job he trained for."

Helping frontline staff understand what law and policy require turned out to spark an important shift; some staff had been under the mistaken impression that it was inappropriate to even ask if a person had a disability.

State policy recommendations

State policymakers and advocates interested in improving upskilling opportunities for adults who have disabilities have a variety of potential levers available to them. The recommendations below focus on how states can facilitate better alignment between adult education, workforce, and VR systems, allowing for more effective implementation of proven approaches such as IET.

- ◆ **Invest state resources to facilitate local innovation.** While Rural Capital provides a compelling example of what can be accomplished with relatively limited federal resources, those resources are not sufficient to meet the full scope of system needs. States can provide a more substantial boost to systems alignment by investing state funds in a grant program to provide targeted support to local stakeholders. These grants should include support for:

- **Technical assistance in developing cross-system partnerships.** The momentum and focus provided by an external facilitator were crucial in helping Rural Capital stakeholders establish a more substantive partnership. Whether through centralized technical assistance or locally driven initiatives, states should provide funds to help local partners retain facilitation assistance (if appropriate), identify service gaps, draft Memorandums of Understanding, develop standardized processes and procedures, and deepen collaborative activities to improve participant outcomes.
- **Professional development opportunities for adult education, workforce, and VR partners.** Staff cross-training and education was crucial to establishing trust, a shared vocabulary, and common referral processes across the Rural Capital partners. These practices in turn helped improve participant access to services and success. States should invest in similar professional development

opportunities for staff members across education, workforce and vocational rehabilitation systems. In addition, as described above, one outcome of the Rural Capital partnership has been collaboration in the development and implementation of Integrated Education and Training programs that can serve adult learners with and without disabilities. States should provide guidance and professional development assistance to support local areas in achieving WIOA mandates such as IET as part of their collaborations.

- **Development of shared data systems or common data standards to facilitate the sharing of data.**

States are already required to report on individual participant and program outcomes under WIOA, and many states have implemented broader data dashboards or State Longitudinal Data Systems (SLDS) that incorporate this and other data to help inform policymakers' and the public's decisions about workforce and education programs. However, states can do more to simplify and support data-sharing across WIOA titles, while still protecting individual privacy and meeting confidentiality requirements. States should support the development of local data management systems, whether they are fully shared across partners or simply inter-operational. States

should also ensure that adult education and VR representatives are included in state data systems policy decision-making and that the design of such systems is responsive to the particular needs and concerns of these partners.

- ◆ **Issue state policy guidance outlining opportunities for alignment.** Regardless of whether a state is operating under the Texas model of combining adult education, workforce, and VR services under a single department, state officials should still provide guidance to local partners on how to operationalize the cross-title partnerships envisioned by WIOA. In particular, states should consider providing specific guidance on how adult education partners can use state leadership funds to support program improvement through VR collaboration, capitalize on partner organizations' expertise in developing and implementing IET programs, and improve participant outcomes through more effective collaboration.

- ◆ **Capitalize on federal policy mandates and resources to bring together key state agency and institutional partners to develop a shared strategic vision.** WIOA requires states to develop multi-year plans that describe how partners across all of its titles are working together to serve jobseekers and learners. States should take advantage of this federal requirement by using the Title

INDIVIDUALS WITH DISABILITIES WOULD BENEFIT FROM GREATER UPSKILLING OPPORTUNITIES



21% have less than a high school education



34% have only a high school diploma or equivalent



70% want to work

I (workforce) state leadership funds that are earmarked for core programs alignment to help local partners deepen their collaboration in advance of the next four-year plan deadline in Spring 2020.

Regardless of which of the above recommendations a state chooses to pursue, a core principle of the vocational rehabilitation system and broader disability rights movement is that people with disabilities should be at the table as active decisionmakers in policy discussions affecting their lives. Following this principle, states should ensure that their efforts to improve systems-level coordination include individuals with disabilities and adult learners in decision-making roles.

Federal policy recommendations

While the WIOA legislation is not yet due for reauthorization in Congress, federal agencies can take steps in the interim to facilitate and encourage greater alignment between adult education, workforce, and VR systems. In particular, federal policymakers should:

- ◆ **Issue guidance to encourage states to use their leadership funds to support collaboration.** WIOA Titles I and II provide funds for state leadership activities, which can include the kinds of collaborative work described in this brief. The Departments of Labor and Education should issue guidance encouraging states to use their leadership funds for this purpose, and providing examples of how states such as Texas have done so.
- ◆ **Issue joint guidance and provide technical assistance to help states utilize the upcoming WIOA planning process to foster collaboration.** States will be required to submit their next unified WIOA plans in Spring 2020. The Departments of Labor, Education, and Health and Human Services should develop joint guidance to help state officials utilize the planning process to improve coordination across titles while preserving program integrity. The Departments should ensure that guidance is disseminated at the sub-agency level, in conjunction with existing technical assistance offerings provided by the Employment and Training Administration, the Office of Career, Technical and Adult Education, and the Rehabilitation Services Administration.
- ◆ **Consider opportunities for data collection on co-enrollment of WIOA Title II and IV participants.** At present, federal data collection captures information on individuals who are receiving simultaneous services from Titles I and II. This is known as “co-enrollment.” Federal policymakers should explore the potential for tracking co-enrollment between Titles II and IV as well, thus providing states with an additional tool by which they can benchmark their systems alignment progress.
- ◆ **Fund WIOA at full authorized levels.** The Workforce Innovation and Opportunity Act is one of the nation’s foremost investments in adult education and workforce development. Yet frequent spending cuts over the past fifteen years have cut federal investment in WIOA



by approximately 40 percent in current dollars. While Congress has recently begun to reverse this trend with modest increases in WIOA funding for the FY18 and FY19 budget cycles, future appropriations should fund WIOA at its full authorized levels.

Appendix: Texas Workforce Commission policy guidance documents

As described in the case study section of this brief, TWC has issued several policy guidance documents to assist local adult education providers in implementing integrated education and training as required under WIOA:

- ◆ **AEL 04-16, Chg. 1** Implementing Integrated Education and Training English Literacy and Civics Education—Update
- ◆ **AEL 01-18, Chg. 1** Educational Outcomes for Adult Education and Literacy—Update
- ◆ **AEL 04-17** Implementing and Reporting Workforce Preparation Activities
- ◆ **AEL 03-17** Implementing and Reporting Workforce Training under the Integrated Education and Training Approach to Service Delivery
- ◆ **AEL 02-16, Chg. 1** Implementing the Integrated Education and Training Service Approach—Update

TWC has not yet issued formal guidance regarding adult education, vocational rehabilitation, and workforce systems alignment. However, TWC **has** included a requirement related to this alignment as part of its WIOA Title II Request for Applications:

Section 9.4 Alignment with boards, the Texas workforce system, employers, and other community partners. Eligible Offerors must coordinate with: Local Workforce Development Boards (40 TAC § 805.4 (6)), Workforce Solutions Offices, and Vocational Rehabilitation Services to facilitate referral and/or Co-enrollment of common customers in Core Programs and coordinate with other community and social services partners as outlined in the Local Board Plan.

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Endnotes

- ¹ Among adults age 25 and older, 21 percent of Americans with disabilities have less than a high school education, compared to 10 percent of Americans without disabilities. Overall, 20 million working-age Americans have a disability, representing 10.3 percent of the population between the ages of 18-64. (Source: US Census Bureau, American Community Survey 2012-16 five-year data.)
- ² *United States' Forgotten Middle* (National Skills Coalition, 2017). Viewable at: www.nationalskillscoalition.org/resources/publications/2017-middle-skills-fact-sheets/file/United-States-MiddleSkills.pdf
- ³ *Time for the U.S. to Reskill?* (Organization for Economic Cooperation and Development, 2013.)
- ⁴ U.S. Census Bureau, American Community Survey 2017 data. It should be noted that limited educational attainment is not synonymous with lack of foundational skills. However, data from the OECD's Survey of Adult Skills, known as the PIAAC, as well as other sources suggest there is a strong correlation.
- ⁵ U.S. Department of Labor, Office of Disability Employment Policy: <https://www.dol.gov/odep/>
- ⁶ Kessler Foundation 2015 National Disability & Employment Survey: https://kesslerfoundation.org/sites/default/files/filepicker/5/KFSurvey2015_ExecutiveSummary.pdf
- ⁷ Title II funds can also be used to support Integrated Education and Training classes that combine instruction in foundational skills with training for a specific occupation or industry.
- ⁸ Individuals with disabilities are also served by Title I workforce development services. Title I partners are vital coordinators in the WIOA system, as detailed later in this brief.
- ⁹ *The Well-Being of Nations: The Role of Human and Social Capital*. (Organization for Economic Co-operation and Development, 2001). Viewable at: www.oecd.org/site/worldforum/33703702.pdf
- ¹⁰ Individual states often rebrand American Job Centers with state-specific names. Texas, for example, calls them Workforce Solutions centers.
- ¹¹ This section of the WIOA legislation, passed in 2014, amended Title I of the Rehabilitation Act of 1973. The reauthorized legislation also funds other rehabilitation services that are beyond the scope of this policy brief.
- ¹² Hispanic is an ethnicity, not a race; Hispanic people may be of any race.
- ¹³ IET is a program model that allows individuals to improve foundational skills such as reading or math while also being trained for a specific occupation or industry. The model has been proven to be successful for a wide range of adult learners and jobseekers. Learn more about general IET models at: <https://calpro-online.org/onlinevideolibrary/iet.asp> and about the specific I-BEST version of IET at: www.sbctc.edu/colleges-staff/programs-services/i-best/. WIOA requires that states offer at least one IET program, although not every locality within a state must offer IET. The Texas Workforce Commission further strengthened the push for IET by issuing a series of policy directives encouraging adult education providers to implement the model. See Appendix for links to the directives.
- ¹⁴ The decision to move VR services from the former Department of Assistance and Rehabilitative Services (DARS) to the Texas Workforce Commission was prompted by a report from the state's Sunset Commission raising concerns about duplication and inefficiency in the prior system. National Skills Coalition does not take a position on whether state vocational rehabilitation agencies should be housed under the same state department as adult education programs. Rather, NSC's interest is in describing the policy levers that can facilitate (or hinder) effective practices and how they can best be replicated even in the majority of states that do not house the two agencies under one umbrella.
- ¹⁵ Stakeholders noted that this streamlined approach was especially important given the strict federal mandates for each partner regarding how to handle a customer's personally identifying information, such as Health Insurance Portability and Accountability Act (HIPAA) requirements.



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