

Overall thoughts:

This paper on behalf of CCAE and CAEAA makes many generalizations and misrepresentations about community colleges and community college funding, as well as incorrect assumptions about consortia structure and regional needs. These misleading conclusions are made without mention of evidence or data to support claims; rather they appear to be constructed from anecdotal information. The primary purpose of increasing AEBG funding to K-12 is clear which may include proposing legislation in the next few months to modify AB104. I agree with you that it more importantly serves to undermine regional collaboration which would be unfortunate given the important gains made in establishing trust and partnerships so we can better support our students. For Mt. SAC SCE, the benefits have included the above plus the benefit of additional funds for collaboration, equipment, professional development, and most importantly to support increasing gaps in vocational education and establishing an Adults with Disabilities program. Other than Hacienda La Puente USD, no one in our consortium initiated programs to serve disabled students within our region. Without AEBG funding, we would not have been able to grow these programs.

Overall, it is too early to make recommendations for systematic or procedural changes. Due to a lack of adequate data systems we don't yet have one full year with clean data and a true picture of what is working and what is not. Change of this magnitude needs time and communication instead of recommendations based on anecdotal observations and individual agendas. I also truly believe that for the most part, K-12 partners are in favor of continuing the collaboration on behalf of students. (Projected number of 2016-17 students to be served in the Mt. SAC region is approximately 53,000.)

I've included your highlighted sections as well as additional comments by page. My responses are in blue.

Page 2 (additional comments):

Even as collaboration between the systems expands through regional consortium-building and AEBG, the K-12 community-based adult schools still have as their core mission to serve those low basic skills adults who oftentimes get caught in the remediation of post-secondary education. Additionally, the structural and cultural differences between the two systems have become more evident through this planning process and it is critical that the strengths of each be leveraged in ways that support student learning outcomes and appropriate levels of support services. **The adult learners that are best served by K12 adult schools must not be left out.**

I agree that there are cultural differences between the two systems but consortia work is intended produce outcomes that benefit from these differences. The last statement insinuating that adult students are best served by K-12 adult ed is not supported by any evidence and is a generalization of what students need within region. Moreover, community college noncredit faculty have done significant work to define CB21 levels that indicate up to 8 levels below transfer, so community colleges are more than trained to serve adult education students both on and off campus. This section is also showing the author's lack of familiarity with the diverse consortia structures where in some cases the community colleges are the main provider of adult education within the regions (Glendale, NOCCD).

Some colleges are utilizing the funding as supplemental funding to hire consultants and project managers, deans and counselors, and build infrastructure and systems that may or may not connect with the work of the AEBG. While infrastructure, consultants with desired expertise and systems are important, given the significant number of adults in need of basic skills and fluency, adult schools have focused the resources derived from the AEBG on direct services and programs for adult students.

This is interesting because there is discussion in this paper that K-12 adult schools are utilizing dollars to build infrastructures as well. Regardless, this is anecdotal data from observations that are not supported by any evidence. And I don't see the problem in supporting infrastructure when a program requires leadership which will benefit students.

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The funding reports from this summer can lead to mistaken conclusions about the need. The funding came to providers late in the year, and "consortium" funding was spent proportionately less than the adult schools' "MOE" funding for FY 15-16, in large part because of the colleges' perception of the funding being a grant, while adult schools need the funding for all operational costs for direct services to students.

The funding reports mentioned are ones resulting from consortia self-reported expenditure data. The mistaken conclusion about need came from expenditure data that may not be completely accurate. I question how this author can represent colleges' perceptions about consortia funding (dollars meant to align, fill regional gaps, and provide pathways among members). There is no evidence to support the implied connection between perceptions on consortia funding type, apparently by colleges, and whether funds were spent. Consortia members all have access to these dollars and if this fund is underspent, there is no proof that community college influence played a large part in this outcome.

It's true that the allocations came late but it wouldn't have mattered because many of our consortia were still trying to spend AB86 carryover dollars which ended in December 2015. This left 15-16 AB104 funds untouched until January 2016, thus creating a cycle of carryover, especially because of the 3-year spending period. There won't be an accurate picture of how much money was actually spent down until January 2017 when expenditure reports are due.

Additional comments:

Instituting a COLA for AEBG members so as to protect the current capacity and access. □ The statutory COLA for AEBG should be the same percent as COLA for K-12 programs or Community College programs.

Agreed, as long as there is no move to take funds from other needed resources.
Adult Ed block grant name change – fine, agree,

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Unfortunately, however, many consortia are finding that not all stakeholders in each region are being as transparent as would be helpful for helping to prioritize the limited funding. As an example, some community college partners are not providing insight into what pots of funding they have access to that could be used in lieu of AEBG funding. If a community college partner has access to funds to support CTE programs, staff, etc. and there are needs and gaps elsewhere in that region, consortia members should know so as to decide whether AEBG funds should instead be prioritized to fill those gaps instead of supporting efforts where alternative funding may be available and accessed.

It is widely known that consortia leads have turned over at least 50% from 2015-16, so until there is stable leadership, a statement about stakeholders not being transparent is unfair. Many consortia leadership aren't experienced enough to know about other funds sources – they are also just learning AEBG funding. Moreover, there has been no direction from CDE on expectations for additional information about other funding pots consortia should be

disclosing besides AEBG dollars. And K-12s have significant partners such as WDBs, industry partners, and tuition from financial aid payments etc., and the same could be asked of them to leverage alternative funding.

Additional comments:

Unspent Funding in Consortia o Unspent funds in any given year should be justified with an expenditure plan in line with the consortium's regional plan and associated outcome deliverables or be subject to redistribution to those members that are spending the funds. If all programs are not spending then it can be redistributed through a joint decision by CDE and the Chancellor's Office. Consortia plans should include a protocol for this redistribution.

If a consortium does not spend all of its allocation, unambiguous technical assistance should first be provided, including guidance on how to get the funding out in direct services to students. If a consortium still does not use its funds the state office will redirect the funding levels of unspent funds to area of the state in high need, where consortia have spent all their funds appropriately to meet the need.

Other than what I've already said (too early to determine spending is effective or not), it is also too premature to identify a consequence for not spending. More discussion is needed but not until after at least 3 years when leadership stabilizes and consortia establish accurate baseline service levels.

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AEBG adjustments should be made to recognize and prioritize programmatic, direct service operating funds over the use of funds for infrastructure and systems when other funds can be accessed to cover such costs. In this regard, language clarifying funds used by adult schools to rent or maintain a facility that are used for direct programming and services should not need to be itemized as part of a consortium budget. Adult schools have AEBG as its sole operational resource, and this distinction must be acknowledged. In contrast, our community college partners have access to operational dollars that should be used.

Singling out K-12 adult schools by excusing them from accepted budget reporting is further promoting an inequity in expectations between adult schools and community colleges, and more importantly a divide. Further, this statement assumes that community colleges have guaranteed access to the same level of funding each year for operational costs and instruction or that funding is unlimited. Moreover, this recommendation shows a lack of knowledge of the vastly different consortia structures and composition. Some regions' K-12 adult ed programs have made the conscious choice to defer delivery of adult education to community colleges, while some are much like our consortium where member institutions are delivering services as determined by a locally created regional plan and already established services. This general statement assumes all consortia are similar in structure and is not accurate, and furthermore, does not promote consortia to determine what is best for the students within their individual regions.

There may also be an assumption that all community colleges seeking to increase noncredit offerings, for college growth and to fill regional gaps, have immediate operational dollars. And even if emerging noncredit programs were well supported with apportionment, they would not have immediate access to previously mentioned categorical dollar because they would have to prove a baseline of service before gaining these funds.

The CDE is the agency that delivers and monitors the federal adult education funds, WIOA. The WIOA outcomes are in alignment with the AEBG outcomes, (all WIOA outcomes are noted and required to be reported in AB 104). The AEBG programs should be supported by those who support the WIOA program. The funding levels should parallel the payment points reported for WIOA. The technical support, data systems, accountability for funding that is in place for AEBG should really be very closely connected or integrated to that given for WIOA.

*[Background: The CDE has just determined that the CASAS TOPs Pro Enterprise (TE) System will be collecting WIOA II outcomes and student data. Students are pre and post tested using the CASAS literacy tests. This is already used by those receiving WIOA II funds, which we do and we also give the tests. However, **tests are only for ESL and ABE**, and there is now a requirement to use it for data collection in STV, including EOA VOC starting in April. It's a limiting system for community colleges and our student data systems don't communicate with the TE system. We're working on it.]*

This section may have been written before the announcement about the CASAS/WIOA II alignment with AEBG. It appears to be a reminder that the CASAS System, which aligns well with the K-12 adult schools' data systems, student achievement outcomes is the CDE's preference for AEBG outcomes. The comment: **The AEBG programs should be supported by those who support the WIOA program** seems to equate support for WIOA to support for the CASAS tool, which some community colleges aren't preferring to use. It's a literacy skills and life skills assessment and doesn't offer the most relevant diagnostic of noncredit students. This statement may be in part to reactions to the community college grumblings against using this assessment tool, especially given that the CAI will eventually be used by noncredit programs. I'm interested to know how these two will reconcile and co-exist for noncredit students. I anticipate a more cumbersome process to administer two tests to our NC students.

Although the TE system is aligned well with k-12 adult education, there hasn't been a testing of the data or a pilot year to determine if WIOA will align. So I'm surprised at the suggestion about paralleling WIOA payment points and performance because the benefit of doing so is unknown. Starting in April, many non-WIOA AEBG consortia members will be new to using the TE system and will need time to learn how to maximize their outcomes. It's true a large number of the new users will be community colleges but there are numerous adult schools that are not TE users yet. This could hurt the overall statewide performance outcomes. Discussion should also occur prior to determining that performance metrics are best represented by pay points. Finally, it's simply too soon to recommend performance-based funding based on a system that hasn't yet been vetted or piloted by the field.

Note: Even though performance-based funding using the suggested system would not be a problem for Mt. SAC; there are 2 K-12 members in our consortium who don't use TE system.

Distribution – CDE vs. CCCCCO; Direct funding vs Fiscal Agent

This section is a push for CDE to have control over the funds and distribute them to consortia. There is no evidence to tell if either the direct funding model or fiscal agency model is the best option. It's true that many switched to direct funding for 16-17, but there should be a reasonable time for evaluation on which funding model is more effective.

Additional comments:

SB 173 (Liu) – Recommendations & Implementation

- Placement Criteria o For purpose of placement of adult students into Adult Education Block Grant supported classes, members of a consortium should agree upon a set of criteria that can be used for purposes of placement into classes. All agreed upon placement criteria should be accepted by all member agencies for placement into classes.

I'm not sure if they are talking about assessment for progress or placement. WIOA II doesn't include placement, rather it emphasizes progress metrics. If this section is truly about placement, then seeking uniformity is a huge undertaking (see CAI). Also, how AEBG will reconcile any chosen placement tool with the CAI will be a challenge.

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Accountability for K12 and community college adult education programs should focus on outcomes including **certifications, placement in training, immigrant integration, and the workforce**. More specifically, they should encompass NRS outcomes including transitions to post-secondary, obtain and retaining employment, obtaining a high school diploma or High School Equivalency, and more. Additionally, consortia and their members should participate in conversations at the state level to share and integrate data. Adult schools, in particular, should also work with their local workforce development boards as they develop local data integration goals as required by the newest WIOA legislation. **More specifically, accountability should be aligned to the changes within and accountability metrics tied to WIOA.**

Discussion on using **performance-based outcomes** is one that needs field input from both systems, especially from faculty. Most of the above mentioned performance metrics are already included in the legislation. Others such as immigration integration are truly worthy but it would be best to gather data on the existing metrics listed in AB104 that for the Y1 and Y2 have not yet been tested. As for alignment of accountability with WIOA, consortia are in the initial stages of planning with AEBG Data and Accountability funds already in the hands of consortia.

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Performance-based funding

Needs to be developed in such a way as to drive effective and prudent fiscal and programming decisions. **To this end a portion of AEBG funds should be distributed under a performance based model that is based on stated outcomes (similar to WIOA pay for performance system).**

Again, this is too important of an issue to be determined unilaterally by one system or by one constituency. Collaborative discussion with extensive research and evidence on funding models is needed. Workgroups similar to the AB86 steering group structure could also lead to a more unified effort to lead determine funding models. Furthermore, significant work needs to be done to resolve basic statewide data issues. There is no capability to gather accurate performance outcomes if AEBG data efforts can't even generate reports containing unduplicated numbers of students. Data matching would need to occur to determine a consistent baseline that would provide evidence for discussions on funding models.

Reciprocity/Teacher Certification and Minimum Qualifications

- **Challenge: disparity in compensation between K-12 adult school teachers and CC faculty (non-credit teachers vs. adult school teachers); credential component for K-12 adult schools is an extra requirement that deters potential new adult school teachers.**
- K-12 adult school teachers are required to have a credential. As K-12 representatives, we believe this is incredibly important and should be retained. While it institutes an additional requirement on adult school teachers, K-12 adult school students benefit from this requirement. More specifically, the credential is focused on helping prepare a K-12 teacher for practices in teaching that are geared towards little to no educational background giving teachers the tools necessary to help them grow a student's intellectual capacity from the ground up. These skills are not taught as part of a prospects college education, it is separate and apart from those skills. Further, K-12 adult school teachers are often working with adult students who have a lower current skill level than those students attending community college who are often working from some base skill set that doesn't require as much in the way of teaching tools and style.

This is a complex issue that says much about the difference between a system where matters of curriculum, instruction, and credentialing live within a culture of shared governance versus one that is more “top-down.” Furthermore, K-12 adult education credentials are CTE and interdisciplinary, meaning that one credential allows teaching in ESL, basic skills, secondary education, etc., and one for vocational education. This is different than our system where credentialing requires proficiency by discipline. **I believe the deterrent for new adult education teachers in both systems is due to the lack of full-time employment and not from having to complete a credential.** Regardless, this is a sensitive topic that absolutely needs to include a dialogue between CDE, CCCCO, ASCCC, and CTA.

Disparity in compensation is not just between K-12s and community colleges. It varies between colleges and between adult schools. Not all colleges offer parity in pay making noncredit pay on some campuses very similar to K-12 adult education pay. It seems to be a moot point seek higher authority and uniformity over compensation when this issue should remain at the local levels.

As for the statement “Further, K-12 adult school teachers are often working with adult students who have a lower current skill level than those students attending community college who are often working from some base skill set that doesn’t require as much in the way of teaching tools and style,” this is a short-sighted statement and shows that the author(s) are unaware of the composition of both credit and noncredit community college students and that a large proportion of them are marginalized, underprepared students who left the K-12 system unprepared for college. Community college faculty are highly prepared and versed in andragogy and pedagogy for a diverse population and also have a system of ongoing professional development to stay current with the learning needs of such students.

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Additional comments:

K12 adult schools and community colleges may (not required) institute a nominal fee not to exceed 10% to help cover materials utilized by the student in the course of the programming for ESL and adult basic skills. □ Presuming the loss of funding is backfilled with an influx of additional funding in to the AEBG for CTE, pre-apprentice, and adults with disabilities, fee authority should: □ Be provided at a level not to exceed 50% of the cost associated with the student’s participation in the course of the programming.

This section is concerning. ESL, basic skills and AWD are among the most marginalized students who are lacking the resources and to impose a fee would further promote barriers.

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Creation of an AEBG Stakeholder Advisory Committee – Oversight, Coordination, Facilitation, Neutral Party, “Tie-Breaker”

I support field input and involvement in policy, budget, curriculum, etc., but the composition should come from discussion including CCCCO and CDE leadership and field practitioners.