



SAN DIEGO  
COMMUNITY COLLEGE  
DISTRICT



GROSSMONT-CUYAMACA  
COMMUNITY COLLEGE DISTRICT



NORTH ORANGE COUNTY  
COMMUNITY COLLEGE DISTRICT



June 1, 2015

The Honorable Mark Leno  
Chair, Budget Conference Committee  
State Capitol, Room 5100  
Sacramento, CA 95814

The Honorable Shirley Weber  
Assembly Budget Committee  
State Capitol, Room 6026  
Sacramento, CA 95814

**RE: The Assembly Amendments to the Governor's Adult Education Block Grant  
May Revise Proposal**  
**Position: Oppose**

Dear Senator Mark Leno and Assemblymember Shirley Weber,

On behalf of a coalition of community college stakeholders, including the Community College League of California, San Diego/Imperial County Community College Association, the Association of Community and Continuing Education, and several undersigned colleges, we write to express our concerns with the amendments the Assembly Subcommittee #2 has proposed to the Governor's May Revise proposal for the Adult Education Block Grant.

We would like to commend staff for meeting with many community college stakeholders over the last two years as we identify ways to reform adult education to better serve California students, particularly those in need. We continue to be committed to making the necessary reforms that initially launched this statewide effort and to promote alignment of programs between K-12 and community colleges.

Overall, we support Governor Brown's revised proposal for the Adult Education Block Grant program as it addresses the major concern posed by the requirement for allocation boards. It is a huge step forward and it is clear the Administration continues to make strides for a reformed program that can better serve students. While we do share trepidations with the Governor's proposal to lock-in the Maintenance of Effort (MOE) for adult schools, we feel it is closer to a comprehensive reform of California's adult education system than the version approved by the Assembly.

The Assembly is proposing to instead expand the maintenance of effort certification to only allow local school districts and county offices of education to report spending on all previous adult education programs, instead of the five programs that will be funded going forward. Further, it removes the Chancellor from the maintenance of effort certification process.

Our key concerns with the proposed Adult Education Block Grant are as follows:

***Maintenance of Effort for Funding.*** We have serious concerns with the proposal to lock-in the MOE for adult schools beyond 2016. This proposal limits consortias' ability to respond to changes in regional demand for adult and workforce education by prohibiting year-to-year adjustments to a member's funding except under narrow and undefined circumstances. We support funding the districts' MOE in the five AB 86 approved course areas for the 2015-16 fiscal year. It will ensure that the state builds upon existing programs while reducing potential negative impacts on services to students. The purpose of the consortium approach was twofold: 1) expand opportunities for innovation and collaboration between adult schools and community colleges, and, 2) increase the state's flexibility to meet adult and workforce education needs in each region. The May revise proposal runs counter to the vision enacted by the legislature last year, as it would minimize this much needed flexibility and innovation, and limit the ability of districts to either expand or contract services to reflect the regional workforce demands. The proposal approved by the Assembly further reduces this flexibility and is inconsistent with nearly two years of collaborative efforts to align services and close opportunity gaps throughout the state. We urge you to reject statutory language that locks in funding levels for consortium members and instead maintain the intent of AB 86 to fund consortia based on service levels with a focus on unmet need.

***Mandating community colleges to be consortium members as a condition of receiving noncredit apportionment.*** We are concerned with language adding a new mandate to force participation in regional consortia as a condition for receiving noncredit apportionment. This unnecessarily singles out a portion of the community college general fund money by imposing a condition that does not exist for other community college general fund apportionment resources. Ultimately it may lead to destabilization of general fund apportionment, particularly in years of economic recession. Additionally this condition is a deviation from the original bill intent of AB 86 Section 76, Article 3 which stated that as a condition for receiving categorical AB 86 funds, entities must be members of consortia. The Adult Education Block Grant already includes measures that will ensure community college participation and disclosure of noncredit funds without the need for adding destabilizing mandates. Sections of the bill addressing the need to account for noncredit apportionment in regional plans, which should be sufficient, include:

- As a condition of joining a consortium, a member shall commit to reporting any funds available for the purposes of education services for adults (pg. 4).
- An evaluation of the funds available to the members of the consortium as a requirement for the adult education regional plan (pg. 6).

We urge you to remove language that mandates community college to be consortia members as a condition of receiving noncredit apportionment.

***Need for a Statewide Data Interface.*** The Governor's proposal as adopted by the Assembly does not address the need to collect and coordinate ongoing service-level data. Without a

statewide interface system that can analyze adult school and community college data, the Legislature will have limited knowledge of prior allocations of state funds. A statewide interface can provide an opportunity for real reform and ongoing statewide collaboration in areas such as curriculum alignment, coordination of policies for student assessment, and common student identifiers. Consistent with the concept presented in the Senate's version of the budget, we recommend providing funding to expand an existing statewide data infrastructure that can serve as an interface for CDE and CCCCCO data for purposes of collecting consortia service-level data. Funding should be allocated similar to the Adult Education Block grant and outside the K-12/CCC Proposition 98 split.

Overall, we believe the Governor's Adult Education Block Grant is headed in the right direction and with the revisions proposed above, the program will maintain its intent to expand service level to Californians in need of educational and workforce opportunities. If you should have any additional questions, please feel free to contact me at [lizette@cleague.org](mailto:lizette@cleague.org) or 916-245-5040.

Thank you for your consideration of our position.

Sincerely,

Lizette Navarette  
Legislative Advocate  
Community College League of California

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San Diego Community College District

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Members, Senate Budget and Fiscal Review Committee  
Members, Assembly Budget Committee  
Members, Senate Education Committee  
Members, Senate Subcommittee 1 on Education  
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Members, Assembly Education Committee  
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