

December 23, 2020

Re: Rules for the Administration of the Adult Education and Literacy Grant Program, 1 CCR 301-98

Dear Colorado Board of Education Members:

I am writing on behalf of Spring Institute for Intercultural Learning to provide comments on the rulemaking process that is a result of SB 20-009. This bill, which passed the General Assembly with nearly unanimous bipartisan support, prompts the program in 22-1-115 C.R.S. to update the criteria for the adult education grant to reinforce the program's focus to assist adults to attain basic literacy and numeracy skills that lead to credential attainment and/or employment. Spring Institute was closely involved in the stakeholder process led by Senator Rachel Zenzinger in forming and drafting the language in the law, which is designed to expand access to adult education to individuals without specific workforce needs. Upon review of the proposed rules, we offer the following comments for your consideration:

- The proposed rules refer to “minorities,” an outdated and limiting demographic term. We suggest replacing it with “communities facing barriers,” language that encompasses an appropriately broader range of socioeconomically marginalized adult learners including, but not limited to, racial and ethnic minority populations.
- Section 4.01 Data Collection and Reporting contains language that requires programs to report on information that the department specifically requests from the information required by Title II of the “Workforce Innovation and Opportunity Act.” However, the goals of the AELA program may vary significantly from the goals of WIOA-funded programs and the data reported should reflect the goals of the AELA program rather than WIOA. We suggest that the language regarding information required by Title II of WIOA be deleted and 4.01 should read instead: “Upon completing an adult education and literacy program funded, in whole or in part, by an Adult Education and Literacy grant, grantees must submit information ~~concerning the state-funded program that the department specifically requests from the information required by Title II of the “Workforce Innovation and Opportunity Act,” as amended, 29 U.S.C. sec. 3101 et seq., for federally funded programs. Local Education Provider Adult Education and Literacy Grantees also must shall~~ to the Department describing the following:”
- We suggest adding language to Section 4.01.3 to include the attainment of certifications, as follows: “The educational progress made by participating students as measured by standardized tests, ~~and~~ training completion, **and/or certification attainment.**”

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- Because partnerships with workforce programs are only one potential partnership required of programs, we suggest amending 54.01.4 as follows: ~~“The number of students who received workforce services, including the number of students who entered employment;~~ **The nature of the required education attainment partnership with an elementary or secondary school, a public or private institute of higher education, a local district college, an area technical college, or a workforce partnership and a description of how this partnership contributed to the success of the program.”**
- Section 4.01.5 requires programs to submit information regarding “The number of students who remained employed one year after the completion of the program.” However, this will not be a goal of all the AELA programs and it does not make sense for all programs to report on this data. Moreover, tracking data on students a year after completion of the program requires substantial staff time and resources and poses an undue burden to adult education organizations/programs. We suggest that 4.01.5 be replaced by the following text: ~~“The number of students who remained employed one year after the completion of the program.”~~ **The number of students who report progress or achievement on their personal program goals upon completion of the program (e.g., employment gains, increased engagement with children’s education, attainment of credentials, engagement within their community, etc.).”**

Sincerely yours,



Paula Schriefer  
President / Chief Executive Officer