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Jared Polis
The Honorable Governor of Colorado
Office of the Governor
136 State Capitol Building
Denver, CO 80203

Dr. Ally Garcia
Director of Adult Education Initiatives
Office of Adult Education Initiatives
201 East Colfax Avenue
Denver, CO 80203

Dear Governor Polis and Dr. Garcia,

We write on behalf of adult education provider organizations in Colorado. We share deep concerns regarding the recently released Request for Applications (RFA) for the Adult Education and Family Literacy Act (AEFLA) grant issued by the state's Office of Adult Education Initiatives (AEI). We believe that the current RFA will systematically disqualify or substantially reduce funding levels for most of the Adult Education programs in Colorado, resulting in a greatly negative impact on the state of Adult Education in Colorado and the ability of adult learners to access classes. Below we take issue with both 1) the late-stage creation of current grant eligibility requirements and 2) the nature of current grant eligibility requirements. Additionally, there are serious performance issues of the AEI office housed in the Colorado Department of Education regarding their communication, support, and oversight of AEFLA and Adult Education and Literacy Act (AELA) grantees and these issues will be detailed in a separate communication.

1. The Late-Stage Creation of Current Grant Eligibility Requirements:

- a. At the outset of the current four-year grant cycle, programs were informed that the success of their program would be based upon their ability to advance participants' English Functioning Level by one level each grant year (otherwise called a Measurable Skill Gain). Despite this being the reported requirement of grantees upon grant award, AEI issued additional grant requirements in the RFA (i.e., the Q2 Employment Rate, Q2 Median Earnings, and Q4 employment rate). While we understand these to be important metrics, we ask that these be made requirements of future grant cycles, rather than retroactive determinants of grant success in previous cycles. As organizations committed to delivering high-quality adult education services, we rely on clear and transparent guidelines to fulfill our mission effectively. The sudden imposition of new eligibility criteria without proper notification or consultation is unfair and undermines the efforts of all currently funded programs.

2. The Nature of Current Grant Eligibility Requirements:

- a. Several significant deficiencies exist in the nature of the RFA grant eligibility requirements. Specifically, the requirements outlined in the RFA (i.e., the Q2 Employment

Rate, Q2 Median Earnings, and Q4 employment rate) are driven by Social Security Number data matches. Historically SSNs are not a requirement for entry into AEFLA and AELA-funded programs. AEI asked programs to collect as many SSNs as possible, and outside consultants were brought in to speak on the matter in FY 22/23. Despite the aforementioned point, this does not legitimize the inclusion of this data point in the RFA, rather it underscores the limited data in the early years of the grant, and the lack of accuracy born out in the data. In an attempt to collect this data, in FY 23/24 AEI provided AEFLA programs with additional funds to capture Q2 and Q4 data, but the funds were not supplied in the three years in which programs were expected to demonstrate their effectiveness. To the contrary, the cap of 10% administration costs signals a focus on instruction as the programmatic priority. The RFA awards an inordinate number of points to data that requires a heavy (and impossible at 10%) administrative cost to obtain, especially when weighed against a program that would be applying for fewer types of service. Finally, an award system based on SSN data functions to discriminate, due to lack of equal weight given to newly arrived immigrants—specifically the vast number who have yet to have the opportunity to obtain proper documentation.

- b. Current grant eligibility requirements are oriented toward workforce and higher education outcomes and overlook the large subset of learners not interested in entering the workforce or higher education, but rather becoming better partners in the education of their children. While we recognize the importance of workforce and higher education outcomes, our programs primarily focus on core literacy services and do not receive funding to support employment services or post-secondary education. The shift in focus from core literacy services to a workforce-and-higher-education-model are demonstrated by attaching such a high quantity of points to employment and median earnings in the RFA. It is certainly understandable that one of the goals of the state is to make participants workforce-ready as soon as possible. However, many are further away from readiness than four years as demanded by the RFA's focus. For example, MSU Denver's Family Literacy Program has seen a 400% increase in number of participants served in the ESL Low Beginning level. Additionally, the lack of access to reliable longitudinal outcome data makes it challenging for programs to assess their performance accurately and adjust their strategies accordingly.

As noted in our opening, most concerning is the potential outcome of these eligibility requirements, that is the closure or reduction in size of successful programs across the state. For example, The Learning Source, which has consistently met the Minimum Skill Gain (MSG) requirement that was communicated by the AEI office during the grant cycle, anticipates having to close approximately five locations, reduce services offered, and terminate 20-40 instructors due to reduced funding resulting from the new eligibility criteria. For further example, Jefferson County Public Schools which has also consistently met MSG requirements foresees the closure of two locations, displacing 13 instructors and approximately 1,000 adult learners. Such consequences not only jeopardize the livelihoods of dedicated educators but also deprive thousands of adult learners of access to vital educational resources.

We ask that the Adult Education Initiatives office rescind the eligibility requirements in the current RFA and re-issue the RFA with the previous eligibility requirements. Over the course of the next implementation period, we urge AEI to engage in meaningful dialogue with stakeholders to

develop a more equitable and effective framework for supporting adult learners in our state going forward.

Our organizations remain committed to providing high-quality adult education programs and services to adults throughout Colorado regardless of their literacy level and ability to enter the workforce on a short, predetermined timeline. We look forward to working collaboratively toward a solution that serves the best interests of our communities. We will provide further information regarding the additional performance issues we have experiences with AEI in a separate communication.

Thank you for your attention to this matter.

Sincerely,

Josh Evans, Ph. D., Chief Executive Officer
The Learning Source

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Focus Points