Dear State Directors:

I am writing you this letter of clarification and encouragement to further assist you in preparing for a timely and robust implementation of Title II of the Workforce Innovation and Opportunity Act, Pub. L. 113-128 (WIOA) and to clarify the participation of the Carl D. Perkins Career and Technical Education Act of 2006, Pub. L. 109-270 (Perkins IV) in combined state planning efforts.

It has been great to receive informal reports and reactions on social media that show that most of you are involved in your states with developing comprehensive talent development strategies as part of unified or combined state planning efforts.

As our team at the U.S. Department of Education (ED) engages with multiple partners at the national, state, regional, and local levels, I have been asked whether states should wait until the final regulations and the State Plan and Performance Reporting Information Collection Requests (ICRs) have been published before engaging deeply in the implementation of WIOA. The answer is straightforward: Don’t wait — engage now, if you have not already done so.

A second common question relates to what specific steps you can take now while the final regulations and ICRs are pending. You may recall that at the last annual meeting of state directors for WIOA Title II, I mentioned specific steps adult education state directors can take to prepare for the full implementation of WIOA. I also listed steps all partners can take together now. I based those remarks on the various vision documents we have issued.

In this note, I recap my remarks addressed at the Title II annual state directors meeting in Washington, DC.

**Steps WIOA Title II state directors can take now**

As the leader in your state for adult education and for implementation of the Adult Education and Family Literacy Act (AEFLA), you can take immediate action to move forward in achieving the vision for excellence in service to adults who can benefit from improving their literacy and English proficiency skills.
As you engage with partners, these are all steps that can be taken now and do not require the availability of the final rules or guidance:

1. Develop and communicate to state partners and local providers a vision for how adult education aligns with core programs and one-stop partners. Establish strong partnerships with core programs and other necessary community partners to successfully serve adult learners.

2. Align adult education content standards with your state’s K-12 standards. Work with local adult education programs to identify curriculum frameworks for the standards that take into account academic requirements for non-remedial credit courses in postsecondary institutions. Partner with local adult education leaders and practitioners to consider the content of occupational and industry standards that are widely used in the state and ensure that teachers are trained and supported to implement standards-based education.

3. Clarify how you are going to commit to improving teaching and learning in every local adult education program.

4. Clarify with local adult educators concerning the use of technology to improve teaching and learning.

5. Provide leadership and technical assistance to local adult educators in their efforts to create stronger linkages with employers in partnership with other core programs, particularly in the area of design, delivery, and evaluation of career pathways educational programs, integrated education and training, and workforce preparation activities that are responsive to regional and local labor market demands.

6. Identify and disseminate information about models and promising practices that improve education and employment outcomes and establish a process to disseminate them for wider use among local providers paying particular attention to evidence-based practices.

7. Develop, with your partners or otherwise, a strategy to evaluate programs and activities to ensure continuous improvement and expand the available evidence base using the most rigorous analytical and statistical methods that are reasonably feasible to promote efficiency and effectiveness of the workforce development system.

Steps Perkins IV state directors can take now

All national WIOA partners, including ED, have acknowledged the important role that career and technical education (CTE) can play in a state’s workforce development strategy and have encouraged states to consider the inclusion of Perkins IV in a state’s Combined State Plan. Including Perkins IV in a Combined State Plan can produce an important level of alignment and may be critical in creating robust state and local career pathway systems. In addition, the role of postsecondary Perkins IV-funded CTE programs as mandatory local partners in one-stop systems warrants supportive state leadership and engagement.
These are the specific steps Perkins IV state directors can take now:

1. Reach out to your State Workforce Board or Governor’s Office to discuss a Combined State Plan option that includes Perkins.

2. Identify which planning agreements — as part of a Combined State Plan that includes Perkins IV — will need to be incorporated briefly and succinctly in your State’s annual Perkins IV revisions. (Note: The requirement for submitting Perkins IV State plan revisions — not a full State plan until such time as Perkins IV is reauthorized — is the same regardless of whether or not your State chooses to submit a Combined State Plan, though the portal through which the plan must be submitted might be different. The estimated average burden hours for a state to submit revisions to its Perkins IV State plan is 40 hours).¹

3. Convene local postsecondary Perkins IV CTE partners and facilitate an exchange of ideas about and clarifying the responsibilities of mandatory local partners.

4. Utilize your State’s labor market data to inform State and local program development.

5. Work with State and local boards to develop and implement career pathways that align education, training, and supportive services.

6. Streamline your efforts to engage and partner with employers at State and local levels.

7. Consider ways to align your Perkins IV postsecondary measures to the WIOA common measures and to provide Perkins IV data in the training provider reports that will be made available to the public.

Steps all partners can take now

Below are actions that workforce development system leaders and partners can take to move toward full implementation of WIOA. Consider these actions in transition discussions to ensure that you and your programs are well positioned to implement the vision of WIOA. This list is not exhaustive and you should fully assess your own situation and requirements to determine the activities you will need to undertake to support a full and effective transition.

With your partners, you can engage in these areas of work, all of which are beneficial, even before final rules and guidance are available:

1. Build new and strengthen existing partnerships while also engaging in strategic planning to find new ways to align core programs and optional programs that may be included in a Combined State Plan, as well as required and optional partners in WIOA’s one-stop delivery system.

¹ The estimated number of burden hours (2,240) noted in the August 6, 2015, Information Collection Request (ICR) for the WIOA Unified and Combined State Plan Requirement is for all 54 entities that may submit a Combined State Plan that includes Perkins.
2. Support the development of plans to ensure Workforce Development Boards become WIOA-compliant. State and local boards were required to meet the new membership requirements and be able to carry out new functions as of July 1, 2015.

3. Use transition plans to guide implementation of new WIOA requirements and to consider customer impacts, such as how current AEFLA participants or CTE students will be affected by the WIOA transition.

4. Reassess the one-stop delivery system together with your core program and optional program partners.

5. Identify and collaborate with new or existing youth service contract operators in order to increase services to disconnected, out-of-school youth and reconnect youth to education and jobs.

6. Implement the fiscal and program changes related to the transition from WIA to WIOA. Of note, ED and the U.S. Department of Labor (DOL) have adopted the new Office of Management and Budget (OMB) Uniform Administrative Requirements (2 CFR Part 3474 and 2 CFR Part 200).

7. Assess your state laws to identify areas that may conflict with WIOA so that plans and strategies can be made to resolve these conflicts.

I hope this letter of clarification and encouragement is helpful as you partner at the state level to create opportunities for youth and adults, particularly those youth and adults facing significant barriers to employment or advancement. You may find additional information about WIOA and AEFLA at: http://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/wioa-reauthorization.html. Information about Perkins IV and WIOA can be found at http://cte.ed.gov. DOL also has a WIOA resource page at http://www.doleta.gov/wioa/.

Please keep us informed about the progress you are making and any unexpected challenges you are facing and addressing. Our team looks forward to our continued partnership and providing support where we and our partners can.

Sincerely,

[Signature]

Johan E. Uvin
Deputy Assistant Secretary,
Delegated the Authority of the Assistant Secretary