

Adult Education Block Grant

Measuring Student Progress in Basic Skills
and ESL Part II

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White Paper for Basic Skills
Assessment Committee
Meeting 2

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Overview

This paper was prepared for the Adult Education Block Grant (AEBG) Basic Skills Assessment Field Committee to guide discussions on measuring student progress and ABE, ASE, and ESL programs. The purpose of the Basic Skills Assessment Field Committee is to propose definitions for programs, reporting metrics, and parameters for basic measurable skills gains and completion for adult learners served by consortia receiving AEBG funds allocated by the state under AB104 (2015; Chapter 13, Sec's 38, 39 and 40.

On request from CDE and the Chancellor's Office, a draft version of the report to the legislature was prepared for internal review by the state agencies, using feedback and guidance from the CTE, Basic Skills, and Data and Accountability meetings thus far. To support transparency in the overall AEBG data and accountability process, key definitions and elements from that report are included here with supporting guidance from WIOA. This includes:

- Proposed processes for data collection and reporting for K12 adult school and community colleges in the 2017/18 and 2018/19 program years.
- Proposed definitions for Adult Education programs and populations
- Federal WIOA language defining measurable skills gains and the completion of an educational functioning level.
- A proposal, drawn from the legislative report, on the development of a common assessment policy for adult learners in ABE, ASE, ESL and college basic skills programs,
- Proposed reporting metrics for AEBG drawn from the draft legislative report incorporating feedback from all the AEBG field teams.

AEBG Reporting Systems

In the AEBG Data and Accountability Committee (DAC), practitioners and state leadership evaluated how to best leverage TOPSpro Enterprise and the community colleges MIS system for reporting AEBG student enrollment and outcomes.

College practitioners reported challenges in data reporting due to the mismatch between MIS fields and required data elements in TOPSpro Enterprise (TE) and challenges in the use of CCCApply for enrollment of adult school students. K12 practitioners strongly supported the continued use of TE for reporting student enrollment and outcomes. After extensive discussion, the DAC recommended:

- That TE be used for student data reporting for all K12 adult school students *and* students in WIOA Title II funded programs,

- That the Chancellor’s Office retrofit MIS and CCC Apply to capture AEBG metrics, making it possible to track the same elements captured by TE for all community college AEBG students. The use of MIS and CCC Apply for AEBG data reporting would begin in the 2018/2019 program year,
- That all AEBG K12 adult school providers and community colleges continue to use TE for quarterly data reporting in the 2017/2018 academic year to ensure consistency during the transition to MIS for college data. The Chancellor’s Office will use end of year MIS data extracts to supplement TE data in 2017/18 to fill any gaps in data collection.
- That the Chancellor’s Office will do a comparison of TE data and MIS end of year data to build an initial baseline data set for comparison and to debug the data matching and reporting process.

Adult Education Programs and Populations

Program Universe: AEBG will collect quarterly and yearly enrollment and outcome data on all K12 adult education and community college noncredit students participating in the 7 AEBG program areas. This will include K12 adult school and community college noncredit students whether funded by AEBG, WIOA Title II, Perkins, or community college noncredit apportionment.

The intention is to capture the capacity being developed by consortia who are braiding funding to increase services to adults regardless of fund source. The second goal is to incentivize the increase of enhanced noncredit programs developed by community colleges to supplement the state’s investment in AEBG, increase the total population of students transitioning into postsecondary programs, and improve integration between K12 adult schools and community college noncredit programs.

Populations and Programs: Assembly Bill 104 does not clearly distinguish between populations and programs in the authorization of AEBG. A recent implementation of study of AEBG by the Center for Law and Social Policy identifies that the the 7 “programs” areas are in fact a mix of services delivered for specific populations:

- Adults with disabilities,
- Unemployed or underemployed adults,
- Non-native English speakers,
- Adults seeking to enter the workforce for the first time or after a prolonged absence from the labor force;

and service models or programs:

- Foundational skills for high school completion or transition to postsecondary education (ABE, ASE, ESL),
- CTE programs leading to postsecondary credential attainment, which includes preapprenticeship and reentry services for workers with profound barriers to labor force participation as significant sub-categories.¹

For practical purposes, it is useful to distinguish ‘populations’ from ‘services’ to create clearer protocols for data collection and reporting on the effectiveness of AEBG direct and leveraged investments. Additionally, practitioners identified where there were specific program models such as preapprenticeship or Integrated Education and Training which should be considered subareas of CTE or that incorporated a combination of CTE and basic skills in an integrated model.

In tackling the related issues of AEBG populations and programs, practitioners established definitions for the major programs and populations that should be tracked by AEBG and for program sub-strategies that require separate data flags or that should be pulled with population data flags.

Four main program areas will form the backbone of the AEBG data system:

- **English as a Second Language (ESL)**: provides instruction in the English language to adult, non-native English speakers of English with varied academic, vocational, citizenship, and personal goals.
- **Adult Basic Education (ABE)**: provides instruction in foundational academic skills, such as reading, writing, and basic mathematics, as well as learning skills and study skills. These programs include courses that are below Low Adult Secondary Education/9th grade level.
- **Adult Secondary Education (ASE)**: provides instruction in foundational academic skills, such as reading, writing, and basic mathematics, as well as learning skills and study skills. These programs include courses that are at the Low Adult Secondary Education/9th grade level and above and/or lead to a high school diploma, GED, or high school equivalency certificate.
- **Short Term Career and Technical Education (CTE)**: prepares adult learners to enter the workforce in a year or less.

In addition, five sub-areas will provide greater insight into the needs of specific populations and key training strategies:

¹ Mortrude, Judy and Anna Cielinski (2017); *Prosperity through Partnership: Opportunities for AEBG to Strengthen Systems and Communities*; Center for Law and Social Policy.

<http://aebg.cccco.edu/Portals/1/docs/AEBG%20Reports/6.6.17%20Prosperity%20Through%20Partnership%20-%20Opportunities%20for%20AEBG%20to%20Strengthen%20Sy....pdf>

- **Adults with Disabilities (AWD):** Encompasses both programs specifically designed to meet the needs of adults with disabilities, and people with disabilities who are enrolled in other adult education program areas.
- **Workforce Entry/Re-Entry:** Focuses on populations with systemic barriers to economic success who enroll in CTE programs, including adults 55 and older, participants with cultural barriers, displaced homemakers, English language learners, ex-offenders, foster care youth, individuals with disabilities, homeless, long-term unemployed, low-income, low levels of literacy, migrant farmworkers, seasonal farmworkers, those exhausting TANF/CalWorks within two years, and single parents.
- **Pre-Apprenticeship:** Prepares individuals to enter and succeed in a Registered Apprenticeship program, conducted in coordination with one or more apprenticeship programs approved by the Division of Apprenticeship Standards through an MOU or formal agreement.
- **Integrated Education and Training (IET):** Offers instruction that simultaneously provides foundational (basic) skills, workforce preparation (readiness) skills, and workforce training with contextualized instruction and an occupational focus.
- **Adults Training to Support Child School Success:** Provides education and training to adults, typically parents and community members, to help school-aged children succeed in school.

WIOA Measurable Skills Gains – Federal Guidance

WIOA includes measurable skills gain as one of the five indicators for participants in education or training programs leading to a recognized post-secondary credential or employment. Along with credential attainment, it is one of the two performance indicators that can be counted for a participant prior to exit from services. They include:

- Achievement of at least one educational functioning level of a participant who is receiving instruction below the post-secondary education level.
- Attainment of a secondary school diploma or recognized equivalent.
- Secondary/post-secondary transcript or report card that shows a participant is meeting the state’s academic standards – 12 credit hours in a semester if enrolled full-time or 12 credit hours over a year if enrolled part-time.
- Satisfactory or better progress report, towards established milestones, such as completion of on-the-job training or completion of one year of

an apprenticeship program or similar milestones, from an employer or training provider who is providing training.

- Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.²

All participants in WIOA AEFLA Title II funded programs are considered in an educational program leading to a recognized post-secondary credential or employment and are subject to the WIOA measurable skills gain indicator. For ABE, ASE, and ESL programs, this requires that the participant demonstrate achievement of at least one educational functioning level gain:

- Comparison of skill gains through pre- and post-testing of participants using a National Reporting System-approved testing instrument.
- For participants in state-recognized adult high school programs, states may report educational gain through the awarding of credits or Carnegie units.
- A student who exits a program below the post-secondary level and enrolls in post-secondary education and training.³

Common Assessment Policies

Background: To make recommendations for a unified data and accountability system, practitioners had to grapple with the best mechanisms for assessment of student competencies and skills gains. This is important in two contexts: **1)** the initial placement of participants into appropriate programs; and **2)** assessment of student progress. Disconnections become especially important when participants transition from one system to the next: particularly if college assessments place participants at a lower level than the K12 adult school they came from.

Placement: In K12 adult schools and community colleges practitioners use multiple measures for placement that take into account student goals, scores on standardized tests, and other assessment tools. The precise combination of instruments varies from one institution to the next, taking into account the populations served, the local curriculum, institutional resources, and established local norms.

² US Department of Education: Office of Career, Technical, and Adult Education (2016); "Program Memorandum OCTAE 17-2: Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, Title IV Core Programs. <http://www.nrsweb.org/foundations/Program%20Memorandum%2017-2%20OCTAE.pdf>

³ US Department of Education: Office of Career, Technical, and Adult Education (2016); "Program Memorandum OCTAE 17-2: Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, Title IV Core Programs. <http://www.nrsweb.org/foundations/Program%20Memorandum%2017-2%20OCTAE.pdf>

CASAS’s standardized tests are in wide use by both K12 adult schools and community colleges because they are the designated NRS approved assessment instrument for measurable skill gains for WIOA Title II ESL, ABE and ASE programs in California and are tied to payment points. CASAS appraisal instruments may also be used for initial placement into the appropriate program instructional level. Title II requires that WIOA II funded agencies use a federally-approved test (of which CASAS is one option) for measurable skills gain. NRS-approved progress tests are aligned to Educational Functioning Levels (EFL) established through the federal Department of Education’s National Reporting System (NRS) to ensure standardized reporting of measurable skill gains across programs and states.

Community colleges face a disincentive for using CASAS as a primary placement tool, however some community college noncredit programs do use CASAS as part of a multiple measures process for placement. The Student Success Act of 2012 specifies that if colleges use a test for placement of students into developmental education, they must use the common test designated by the Chancellor’s Office as part of the Common Assessment Initiative (CAI). This test is currently under development, so the directive has not yet been implemented.

In 2009, a broadly inclusive faculty process established common ESL, English, and math rubrics across credit and noncredit community college curricula that mapped content to the various levels below transfer, as designated by an MIS code (CB21). In this process noncredit faculty cross-walked the CB21 levels to the National Reporting System educational functioning levels. In the documentation for the rubric, the gap between content is called out explicitly:

One level prior to transfer... is reserved for non-ASE courses as the faculty did not feel that the ASE courses actually met the outcomes of this level as defined in the Reading, Writing and Math CB 21 rubrics. This gap represents the reality of the GED curriculum and the mismatch between outcomes defined for this level in GED and California standards and college-level entry skills.⁴

Chart 2: Summary of CB21 and NRS Levels from the CB21 Rubric

Transfer level English, Reading or Math
CB 21 A – reserved for non-ASE courses in English, Reading or Math (intentional gap)
CB 21 B - ASE (Adult Secondary Education) highest level
CB 21 C – ASE (Adult Secondary Education) lowest level

⁴ Coding the Student Progress Pathway through Basic Skills English, ESL, Mathematics and Reading Courses in California Community Colleges (2009). Accessed at: <http://www.cccbsi.org/cb21-information>

CB 21 D – ABE (Adult Basic Education) highest level
CB 21 E – ABE (Adult Basic Education) intermediate level
CB 21 F – ABE (Adult Basic Education) beginning and literacy level

Student Progress: For WIOA Title II funded programs in California, measurable skills gains are recorded based on the CASAS test scores which are normed to the NRS EFL's. As is the case with placement, multiple measures are often used to determine the specific courses that participants should take, looking at a more holistic set of metrics. For example, a student might meet the cut score to go from ESL High Intermediate to ESL Advanced, but remain in the ESL High Intermediate course because his speaking fluency is not sufficient for the higher-level courses. A student may be tested in two modalities, say reading and listening, but only make an MSG in one. The student is reported as an MSG for WIOA II, but the program makes the best decision about whether to advance the student to a higher level course.

Community colleges have put considerable emphasis on student progression from one CB21 level to the next, as well as passing English and math gateway courses to evaluate student success. Progress along this developmental pipeline is used for the purpose of basic skills funding, using the Basic Skills Progress Tracker—a tool on the Chancellor's Office Data Mart that shows student progression and provides disaggregated data. Progress from developmental to transfer-level coursework is also featured on the Student Success Scorecard. Most K12 adult schools focus on progression within course sequences as well for ABE and ESL and in the context of ASE programs where participants are working toward diplomas or high school equivalencies. Additionally, in California there is precedent for using smaller within educational functioning levels, such as 3 or 5 standardized scorepoints in ABE or ESL as an indicator of student skills gains.

The Common Assessment Initiative test was designed to only be used when a student first enrolls in college, to support initial placement into ESL, English, and math—it is not intended for pre- and post-testing. Therefore, the reporting associated with the test provides information as used in the placement process and high-level summary data for faculty. Assessment results are not provided in a manner that would allow for comparison between testing intervals.

Transition: Given that placement processes are locally defined, there is no consistent policy that governs the types of courses participants must enroll in upon transitioning from K12 adult school to community college, or between adult education providers. Even in the context of credit developmental education, placement is based on local curricula and policies, meaning that a student with the same competencies might be assigned to different CB21 levels and advised to take

different courses at various colleges. Additionally, even if there such policies in place, providers often lack information on the courses students may have taken in their previous school, meaning they must resort to re-testing in order to properly place students.

For adult education participants, particularly given gaps that have already been identified between the highest levels of adult school and the level before transfer, transitions may be rocky. There is no objective measure of whether participants lack sufficient preparation or are being under-placed. Many consortia are working to align their curriculum through AEBG to address these challenges, but articulation agreements are being negotiated between each institution, as opposed to a statewide set of standards. And without consistent data definitions, it will be impossible to examine how prevalent the gaps truly are.

[AEBG Assessment Policies and Practices](#): Despite the policy and practice barriers that make it difficult to establish a menu of common assessments and policies regarding placement into adult education programs, significant work that has already been done could be leveraged to create a common standard. The CB21 rubric creates a high-level crosswalk between measurements used in the K12 adult school and community college systems that AEBG will leverage to align assessment across the two systems.

In the development phase of the Common Assessment Initiative competency maps underlying CB21 were expanded and normed by college faculty against multiple assessment rubrics including NRS, the Smarter Balance assessment, the California Noncredit and Adult Education ESL Model Curriculum Standards, and the intersegmental faculty standards for college readiness, among others. This resulted in the development of competency maps that provide a much more nuanced continuum of pre-collegiate skills, knowledge, and abilities from the lowest competency addressed by community colleges to the highest, with key intermediate milestones identified along the way. The maps reflect many skills that are well below 8th grade Common Core standards and were reviewed by adult education and community-based providers who felt they tracked the critical concepts taught in adult education.

AEBG will create a unified crosswalk that would allow for alignment and consistent measurement of skills across both NRS EFLs and CB21 levels, with the ability to access the more granular information available in the CAI test when it becomes available. This crosswalk will be created by convening a working group of K12 adult schools, community college noncredit, and community college credit faculty in fall 2017.

Once established, K12 adult schools and community colleges will be instructed to leverage the crosswalk to inform and accelerate the development of articulation agreements and local placement policies. Because the rubric will norm the content of both tests and courses, adult education providers can continue to use their local instruments and policies for placement and measuring skills gains, but will have the ability to evaluate offerings and student outcomes from other institutions. Demonstrated mastery of concepts included in the crosswalk could also be used as a multiple measure to allow adult education students to transition directly to the most appropriate college course, without having to go through an extensive placement assessment.

The crosswalk will also be used to conduct analyses regarding consistency of curriculum and gaps in sequences at the state level. For example, the committee recommended that additional metrics be tracked to determine the rate at which adult school students are placed into developmental courses upon enrolling in community college, particularly those who enroll in credit basic skills courses. These metrics have already been identified in the LaunchBoard data element dictionary.

AEBG Reporting Elements and Definitions

A critical step in developing the data system for reporting on adult education is the development of a common data element dictionary for community colleges and K12 adult schools to use in collecting information about students to populate the system. The AEBG data element dictionary includes not only those reporting elements required under AB104, but the identification of additional reporting elements deemed by practitioners to be important for measuring the effectiveness of their programs. The complete dictionary identifies in detail which data flags in TOPSpro Enterprise and the college MIS system should be used by practitioners for reporting their student data. Included here are key elements and reporting element definitions related to that dictionary.

1. **Number of Adults Served by the Consortium:** Reportable Individuals which includes all K12 adult education or community college noncredit students who 1 or more hours of instructional contact hours in any of the 7 program areas and/or received support services. For this reporting element AEBG is adopting the WIOA definition of a Reportable Individual (OCTAE 17-2; pp 25-26).
2. **How Many Adults Served by Members of the Consortium Who Have Demonstrated the Following Measures of Progress:** Students tracked for educational or workforce attainment will include K12 adult school or community college noncredit adult Participants in each the 7 program areas

served by the consortium. For the reporting elements described below AEBG is adopting the WIOA Title II AEFLA definition of a program Participant who has received 12 or more contact hours of instruction (OCTAE 17-2; p. 27).

(A) **Increased Literacy and Basic Skills:** Related to this outcome measure, AEBG will go beyond the guidance in AB104 and report on measurable skills gains for *all* AEBG basic skills programs which include Adult basic education (ABE), Adult secondary education (ASE), English as a Second Language (ESL), and English Language Civics education (EL Civics) in K12 adult education and community college noncredit programs. AEBG is adopting the WIOA definition of a measurable skills gain, which for ABE, ASE, ESL, and EL Civics includes the attainment of an NRS defined Educational Functioning Level (EFL) documenting increased competency in reading and writing, numeracy (ABE/ASE), or English speaking and listening skills.⁵

Adult Basic and Adult Secondary Education: Allowable mechanisms for measuring attainment of an educational functioning level in K12 adult education and community college noncredit ABE and ASE programs include:

- **WIOA Title II AEFLA programs:** Title II funded programs will use CASAS National Reporting System approved CASAS pre- and post-testing instruments. Title II ASE programs have the option of using completion of Carnegie units for documenting a measurable skills gain.
- **Non WIOA Title II funded programs:** Programs not receiving WIOA Title II funds will have the option of using attainment of a functional level tied to completion of a course using a crosswalk of the National Reporting Service EFL's and the community college CB21 course rubric for levels below transfer.

English as a Second Language (ESL) and English Language Civics (EL Civics) Programs: Allowable mechanisms for measuring attainment of an educational functioning level in ESL and EL Civics programs include:

- **WIOA Title II AEFLA programs:** Title II funded programs will use CASAS National Reporting System approved CASAS pre- and post-testing instruments. For EL Civics, in addition to using the approved CASAS pre-and post testing instruments, providers will also use the

⁵ Division of Adult Education and Literacy, US Department of Education (2016); *Measures and Methods for the National Reporting System for Adult Education*. <http://www.nrsweb.org/docs/NRS%20Implementation%20Guidelines%20rev%20to%20February%202016.pdf>.

CASAS Civics Objectives and Additional Assessment Plans (COAAPs) which are also tied to the CDE payment points for EL Civics.

- **Non WIOA Title II funded programs:** Programs not receiving WIOA Title II funds will have the option of using NRS approved instruments or attainment of a functional level tied to completion of a course or a CDCP certificate using a crosswalk of the National Reporting Service EFL's and the community college CB21 course rubric for levels below transfer. For EL Civics, non WIOA providers can report measurable skills gain through approved civic objective additional assessment plans (COAAPs) or the completion of an EL Civics course based on a crosswalk of EL Civics competencies between K12 adult schools and community colleges. College MIS has an EL Civics flag that will be leveraged for this purpose.

Other ABE, ASE, and ESL Measures: In addition to the above metrics, the field teams identified other measures of completion and progress they wanted to include for AEBG reporting and evaluation. These include participants who transition to a new or higher-level program area such as:

- Students who transition from ESL to ABE or ASE,
- Students who transition from from ABE to ASE,
- Students who complete a CDCP certificate in basic skills,
- Students who transition from ABE, ASE, or ESL to a CTE program,

(B) **Completion of High School Diplomas or Their Recognized Equivalents:** For capturing diploma or high school equivalency completion AEBG will require K12 adult schools and community college noncredit programs to report the following:

- Students who complete their high school diploma using appropriate data flags in TE for K12 adult schools and MIS for community college noncredit programs. WIOA II agencies will enter information into TE for reporting to CDE for payment points.
- Student participation in high school equivalency programs using TE for K12 adult providers and appropriate MIS course flags for community college noncredit programs. WIOA II funded agencies will continue to report completion of GED, HiSet or TASK in TE for payment points.
- A data match of the AEBG student population with the data sets from the GED, HiSet, and TASC testing services.

The AEBG office will work with CDE to expand the existing match of adult education enrollment data with GED, HiSet, and TASK attainment data provided by these testing services to provide comprehensive data on AEBG students who obtain their equivalency with support from AEBG providers.

(C) [Completion of Postsecondary Certificates, Degrees, or Training Programs](#): Completion of a postsecondary award for AEBG reporting is considered to be any of the following:

- For CTE programs, completion of a credential aligned to an occupation and that is not a workforce preparation (e.g. work readiness) or occupational safety certificate (e.g. OSHA or Safeserv). This would include, but is not necessarily limited to, CDCP CTE certificates with more than 48 contact hours, locally approved certificates eligible for inclusion on the Employment Training Provider List (ETPL), or certificates that meet the threshold for Perkins or Title IV Federal Student Aid.
- Completion of any for-credit college award – certificate, degree, or transfer that is not developmental. This is a longitudinal measure and would be captured via data match in the Launchboard after the student has transitioned into a for credit postsecondary program.

[Additional Metric – Occupational Skills Gain](#): The AEBG field teams stressed the value of capturing data on students who achieve milestones in CTE programs, but who do not complete their credential or certificate because they obtain employment or realize a shorter term goal related to other occupational or personal goals. As a result, the committees voted to implement a measure for an occupational skills gain that leverages two of the additional WIOA categories for a measurable skills gain:

- Satisfactory or better progress towards established milestones, such as completion of an OJT, 1 year of apprenticeship, or similar milestones reported by an employer or training provider,
- Successful passage of an exam required for a particular occupation or progress in attaining technical or occupational skills evidenced by trade-related benchmarks such as a knowledge based exam.

Such milestones or competency benchmarks could be captured in some cases by course completion related to occupational skills, passage of an exam related to an occupational attainment, or other measure. The committees acknowledged additional work needed to be done to clarify

and expand the above definitions. For the purpose of an occupational skills gain, workforce preparation and occupational safety would be included in this metric.

- (D) **Placement Into Jobs:** AEBG will align data reporting to WIOA to capture employment 2 and 4 quarters after exit using two methodologies:
- A match of AEBG Participant data and the EDD Wage File.
 - Implementation of a participant post-exit survey for AEBG participants who do not provide social security numbers and who are unlikely to show up in a data match against the EDD wage file.
- (E) **Improved Wages:** AEBG will capture increased wages for participants using the same EDD wage file match and survey methodologies mentioned above. To align data collection with WIOA and other reporting systems, AEBG will report the following:
- Participant wage gain two quarters after exit,
 - Participant median wage two quarters after exit,
 - Participant attainment of a living wage.

This reporting metric exceeds WIOA requirements which requires only median income two quarters after exit, however it is aligned to outcome measures tracked for the Chancellor's Strong Workforce Program.

- (F) **Transition to Postsecondary:** K12 adult schools and community colleges both offer CTE pathways that include college level content and that are creditable under Title IV Federal Student Aid as postsecondary credential programs. For that reason, AEBG will define transition to postsecondary in two ways:
- A student who transitions from ABE, ASE or ESL K12 adult or college noncredit program into a CTE program at a K12 adult school, community college noncredit or for credit college,
 - A student who transitions from any ABE, ASE or ESL K12 adult or college noncredit program into a for credit college program that is not developmental,

AEBG will use CTE data flags in TOPSpro to track transition into CTE programs from basic skills in K12 adult schools and will conduct quarterly data matches of AEBG K12 data with the community college MIS system to capture students who enroll into college CTE and for credit programs after leaving K12 adult. TE will track transition into K12 CTE programs from ABE, ASE, and ESL for K12 adult schools.



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