

# Adult Education Block Grant

Defining CTE Programs and Measuring their  
Outcomes

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White Paper for CTE  
Assessment Committee  
Meeting 1

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## Overview

This paper was prepared for the Adult Education Block Grant (AEBG) Career and Technical Education (CTE) Assessment Field Committee to guide discussions on student outcomes related to CTE programs and workforce development for the AEBG initiative. The purpose of the CTE Assessment Field Committee is to propose definitions for program areas, and parameters for CTE measurable skills gains and completion outcomes among adult learners in consortia receiving AEBG funds allocated by the state under AB104 (2015; Chapter 13, Sec's 38, 39 and 40, ed 84830 and 84900). This paper includes the following:

- Background on AEBG including a description of the AEBG target population(s) and scope, a description of data and accountability requirements, and information on alignment with the Workforce Innovation and Opportunity Act (WIOA) performance indicators.
- A review of AEBG program areas related to CTE and workforce development, including key concepts such as short-term CTE, pre-apprenticeship, integrated education and training, and work readiness.
- Information on assessing and documenting measurable skills gains and completion in CTE.

## Background Information

### AEBG Population and Scope

For this paper, the definitions of the population and purposes for adult education is based on the 2012 Legislative Analyst Office's (LAO) report on adult education in California, which include:

- Immigrants who want to learn English, obtain citizenship, and receive job training.
- Native English speakers who are illiterate or only can read and write simple sentences.
- High school dropouts who want to earn a diploma or general educational development (GED) high school equivalency certificate to increase their employability or attend college.
- High school graduates who seek to earn a college degree but have not yet fully mastered reading, writing, or mathematics at pre-collegiate levels.
- Unemployed persons or unskilled workers earning low wages who seek short-term vocational training to improve their economic condition.<sup>1</sup>

The LAO report stresses that adult education is “to provide persons 18 years and older with pre-collegiate-level knowledge and skills they need to participate in society and

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<sup>1</sup> California Legislative Analysis Office, “Restructuring California’s Adult Education System” (2012): <http://www.lao.ca.gov/reports/2012/edu/adult-education/restructuring-adult-education-120412.pdf>

the workforce.” It presumes transition to post-secondary as a primary goal for adult education, however it also presumes a division between collegiate and pre-collegiate education, even though community colleges in California offer courses below college-level in math, English, and English as a second language (ESL) in both credit and noncredit systems. The goal to strengthen pre-collegiate systems is consistent with the recent implementation of enhanced noncredit funding for community college Career Development and College Preparation (CDCP) programs.

In preparation for the AEBG field team process, the California Department of Education (CDE) and the California Community Colleges Chancellor’s Office (CCCCO) met to develop preliminary definitions for the AEBG field teams to use in determining how best to assess student progress and outcomes. Their recommendations include a basic definition of the AEBG population and programs.

*CDE and CCCCCO Recommendation: AEBG students, for the purposes of reporting, include all students served in the seven AB104 program areas for all K12 adult programs, community college noncredit programs, and short-term credit CTE certificates leading to employment.*

The goal was not to deny the importance of credit basic skills, ESL, and advanced CTE pathways, but rather to emphasize the importance of K12 adult systems and college noncredit for increasing post-secondary transitions among adult learners with educational deficits, who need greater support and flexibility. For example, K12 adult schools and noncredit programs offer open-entry-open-exit courses, allow for repetition of courses, and enable students to build competencies and skills without the penalty of a transcribed record should they transfer to a four-year institution. The inclusion of credit short-term CTE certificates recognizes that many colleges have built these credentials as on-ramps into more advanced certificate and degree sequences, and that many consortia are integrating K12, adult education, CDCP, and credit course sequences as transition mechanisms for college and career pathways.

### **Data and Accountability Requirements Under AEBG**

AB104 (2015; Sec. 39) provided \$500 million dollars in funding to the 71 regional adult education consortia created under AB86 (2013; Sec. 76) to support maintenance of existing adult education programs and to support ongoing program expansion and integration with post-secondary offerings. Section 39 included detailed requirements for consortia governance, fund distribution, and alignment with WIOA, Perkins, Local Control Funding Formula (LCFF), apportionment, and other resources. It also established (Sec. 40) core measures for assessing the effectiveness of consortia. These include:

- 1) The number of adults served by the consortium.
- 2) The number of adults served by the consortium that have demonstrated the following:
  - a. Improved literacy skills.
  - b. Completion of high school diplomas or their recognized equivalents.
  - c. Completion of post-secondary certificates, degrees, or training programs.
  - d. Placement into jobs.
  - e. Improved wages. [ed 84920(c)]

Additionally, AB104 established timelines for reporting progress in establishing accountability measures, aligning assessments, and yearly reporting to the legislature. This included identifying measures for assessing the effectiveness of consortia (Aug 1, 2017), options for integrating assessments with the community college common assessment and federal programs (Aug 1, 2017), annual preliminary reports on the previous year's performance (October 1), and final reports on the previous year (March 1).

To date, there have been two rounds of student data collection under AEBG: 1) collection of student baseline data in August 2016 for the 2015-16 program year; and 2) preliminary collection of 2016-17 student data in April 2017, using the TOPSpro Enterprise reporting system. CTE program participation in both rounds of data collection was manually reported by consortia and limited to student workforce goals, program participation, and outcomes. On August 1, 2017 consortia will report their 2016-17 student end-of-year data. Additionally, WIOA Title II participants will be matched with state wage data in summer 2017. In late 2017, the Chancellor's Office plans to roll out a Adult Education tab of the LaunchBoard that will match TE data from 2016-17 with the community college system's student and wage data.

### **AEBG and WIOA Alignment**

AB104 requires the alignment of AEBG with WIOA, including: 1) alignment of AEBG, WIOA, and other regional plans; 2) coordination of AEBG funding with disbursement of funds under the Adult Education and Family Literacy Act (WIOA Title II); and 3) data sharing requirements between CDE, CCCCCO, the California Workforce Development Board and other relevant state agencies.

WIOA includes four program areas, which are administered by different state agencies:

- Title I Adult, Dislocated Worker, and Youth Services (California Workforce Development Board).
- Title II Adult and Family Literacy Act (California Department of Education).
- Title III Wagner Peyser (Employment Development Department).
- Title IV Vocational Rehabilitation (Department of Rehabilitation).

AEBG consortia primarily administer Adult Education and Family Literacy Act (AEFL) funds under WIOA Title II, however both K12 adult schools and community colleges may serve as training providers or career center operators under a local workforce board or county agency related to Titles, I, III, or IV. All WIOA programs are subject to the same list common indicators of performance specified under the act. AEBG measures of effectiveness are aligned with the WIOA measures, as demonstrated in the table below.

WIOA	AEBG
Measurable skills gains	Improved literacy skills
Credential attainment	Completion of high school diplomas or their recognized equivalents
	Completion of post-secondary certificates, degrees, or training programs
Employment rate – 2 <sup>nd</sup> quarter after exit	Placement into jobs
Employment rate – 4 <sup>th</sup> quarter after exit	
Median earnings – 2 <sup>nd</sup> quarter after exit	Improved wages
Effectiveness in serving employers	

At the recent meeting of the AEBG Data and Accountability Committee, a preliminary recommendation was made to also measure whether students had attained the regional living wage, which is also used for the Strong Workforce Program.

It is worth noting that while the outcomes reporting required by the legislature set the bar high, they are also very direct and straight-forward: increased literacy, diplomas, certificates and degrees, employment, and earnings. This reflects the broader framework of AB86 and AB104 which sets the focus of adult education much more squarely on jobs and careers. In ESL and basic skills, this can be seen in the increase emphasis on integrated education and training, such as vocational ABE (VABE) and vocational ESL (VESL). This parallels the implementation of WIOA, which now frames employment and earnings as outcomes for adult literacy programs under Title II in addition to the more traditionally employment-related parts of the act (Title I Workforce Services, Title III Vocational Rehabilitation, and Title IV Wagner Peyser).

## AEBG Programs

AB86 described five programs that consortia were required to address in their consortium plans (Sec. 76). AB104 described seven programs that were allowable uses of AEBG funding (Sec. 39). AB104 also amended the original five AB86 program areas, replacing apprenticeship with pre-apprenticeship and adding requirements for civics education.

AB86/AB104 Section 38	AB104 Sec. 39: Adult Educ. Block Grant
Funds used by each regional consortium to create and implement a plan to better <b>provide adults in its region with <u>all</u> of the following:</b>	<b>Funds apportioned for the program shall be used only for support of the following:</b>
(1) Elementary and secondary basic skills, including classes required for a high school diploma or high school equivalency certificate.	(1) Programs in elementary and secondary basic skills, including programs leading to a high school diploma or high school equivalency certificate.
(2) Classes and courses for immigrants eligible for services in citizenship and ESL, and workforce preparation classes in basic skills.	(2) Programs for immigrants eligible for services in citizenship, ESL, and workforce preparation.
	(3) Programs for adults, including, but not limited to, older adults, primarily related to entry or reentry into the workforce.
	(4) Programs for adults, including, but not limited to, older adults, primarily designed to develop knowledge and skills to assist elementary and secondary school children to succeed academically in school.
(3) Education programs for adults with disabilities.	(5) Programs for adults with disabilities.
(4) Short-term career technical education programs with high employment potential.	(6) Career technical education that is short-term in nature and has high employment potential.
(5) Pre-apprenticeship training in coordination with one or more apprenticeship programs approved by the Department of Apprenticeship Standards for the occupation and geographic area.	(7) Pre-apprenticeship training in coordination one one or more apprenticeship programs approved by the Department of Apprenticeship Standards for the occupation and geographic area.

While AEBG expands the program areas originally defined in AB86 from five to seven, it by no means provides a directive that consortia must provide programming beyond the originally-defined five programs.

## Pre-Apprenticeship

Pre-apprenticeship is the general term applied to programs that prepare individuals for entry into a registered apprenticeship program. Pre-apprenticeship includes a wide variety of programs and practices, ranging from contextualized basic skills and test preparation to complete integrated training programs. Recognizing the value of apprenticeship as a robust “earn and learn” strategy for low income individuals, the Department of Labor (DOL) has issued definitions and a quality framework for effective pre-apprenticeship programs, which have also been adopted by the CCCCCO under its California Apprenticeship Initiative. DOL defines pre-apprenticeship as a “program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership with at least one, if not more, registered apprenticeship programs,” and includes:

- Approved training and curriculum based on industry standards and approved by a documented registered apprenticeship partner.
- Recruitment, educational, and pre-vocational strategies that prepare under-represented, disadvantaged, or low-income individuals to meet the entry requisits of one or more registered apprenticeship programs.
- Access to appropriate support services.
- Meaningful hands-on training that does not displace existing paid employees.
- Formal direct entry or articulation agreements with its registered apprenticeship partners.<sup>2</sup>

Under AEBG, pre-apprenticeship programs must be aligned with one or more registered apprenticeship programs approved by the California Department of Apprenticeship Standards (DAS). In practice, apprenticeship programs may be registered under DAS or the US Department of Labor. Community colleges and adult schools both act as local educational agencies for registered apprenticeship programs, primarily in partnership with construction trade unions. However, under the Chancellor’s Office Apprenticeship Innovation initiative, they are branching out into apprenticeship programs for the mechanical trades, health, information technology, and other industries.

TE includes options to flag students are participating in pre-apprenticeship programs. However, this information is not tracked in the Chancellor’s Office MIS system.

## Short-Term CTE

Short-term CTE is not a standardized concept, and what constitutes short-term depends on both the system using it and the populations they are trying to serve. In a general sense, CTE programs provide occupationally-specific or non-occupational education that

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<sup>2</sup> Department of Labor Training and Employment Notice 13-12 (2012). *Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources*. [https://wdr.doleta.gov/directives/attach/TEN/TEN\\_13-12.pdf](https://wdr.doleta.gov/directives/attach/TEN/TEN_13-12.pdf)

prepares students for the workforce at the secondary, post-secondary, or adult education levels.<sup>3</sup>

The California community college system defines short-term credit CTE as programs requiring 30 units or less, which amounts to approximately one year of full-time study, and provides approval for certificates as low as 18 units (approximately one semester). In some cases, the Chancellor's Office also recognizes lower-unit awards with clear market value, such as Emergency Medical Technician programs that require nine units. In addition, colleges are allowed to offer local certificates that are less than 18 units. In 2015-16, 9% of Chancellor's Office-approved awards and 17% of all credit awards were certificates of under 30 units<sup>4</sup>. It is likely that colleges offer significantly more low-unit awards, but do not report information on these programs to the Chancellor's Office.

Short-term credit awards and the courses associated with them can be coded to indicate whether they are vocational. However, it is difficult to determine which courses lead to which awards within the statewide data set.

The community college system also offers noncredit CTE certificates that are largely short-term in nature, with most requiring between 192-480 contact hours. Noncredit courses can be flagged to determine whether they meet criteria for career development and college preparation, which align with AEBG, as well as whether they are vocational. Specific flags can also be added to differentiate short-term vocational and workforce preparation characteristics at the course level.

Additionally, within the community college setting, some short-term certificates correspond to specific add-on or continuing education skills for working professionals in health care, public safety, and other fields where the audience is not adult learners with barriers to participation in the workforce.

For providers on the Eligible Training Providers List (ETPL) used by the American Job Centers of California (AJCC) for WIOA-funded services, the duration of training varies, from a few weeks for truck driving or warehouse training to a year for medical assisting. Within TE, participants can be flagged regarding whether they are enrolled in CTE programs. In general, ETPL programs funded through WIOA dollars are less than one year in duration.

## Programs for Adults or Older Adults Entering or Reentering the Workforce

In the first meeting of the Data and Accountability Committee, the group highlighted the difficulty of determining how “programs for adults or older adults entering or reentering the workforce” differs from CTE programs. They focused on specific sub-populations that

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<sup>3</sup> Dortch, Cassandra, *Career and Technical Education: A Primer*. (2014), Congressional Research Service. <https://fas.org/sqp/crs/misc/R42748.pdf>

<sup>4</sup> Chancellor's Office Data Mart. [http://datamart.cccco.edu/Outcomes/Program\\_Awards.aspx](http://datamart.cccco.edu/Outcomes/Program_Awards.aspx)

are likely to be included in this area, which ranged from incumbent worker training to re-entry for the formerly incarcerated. They suggested that this program should be evaluated by examining disaggregated outcomes for specific types of participants that could be flagged using the WIOA barriers to entry categories, which could include:

- Veteran
- Low-Income
- Individual with a Disability
- Ex-Offender
- Homeless Individual/Runaway Youth
- Current/Former Foster Care Youth
- English Language Learner
- Basic Skills Deficient/Low Levels of Literacy
- Cultural Barriers
- Migrant and Seasonal Farmworkers
- Exhausting TANF within Two Years
- Single Parent
- Displaced Homemaker
- Long-Term Unemployed

If this area were to focus on the concept of re-engagement, it might also provide a way to address two key concepts for adult education populations: workforce preparation and integrated education and training, which are described below.

### Workforce Preparation

The fundamental issue of workforce readiness at the federal level has been discussed for decades, including the 1991 Secretary's Commission on Achieving Necessary Skills (SCANS) report entitled "What Work Needs from Schools." The report defined foundational and workplace competencies for participation in high-performance workplaces.<sup>5</sup> SCANS competencies are incorporated into the Department of Labor sector competency models, college and career readiness curriculum, and assessments by Academic Innovations (Get Focused Stay Focused), ACT, CASAS, New Ways to Work, and others.

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<sup>5</sup> Department of Labor (1991), *What Work Needs from Schools*, <https://wdr.doleta.gov/scans/whatwork/whatwork.pdf>

## SCANS Competency Model

Foundations	Workplace Competencies
<b>Basic Skills:</b> Reads, writes, performs arithmetic and mathematical operations, listens and speaks	<b>Resources:</b> Identifies, organizes, plans, and allocates resources – time allocation, money, material, human resource allocation
<b>Thinking Skills:</b> Thinks creatively, makes decisions, solves problems, visualizes, knows how to learn, and reasons	<b>Interpersonal:</b> Works with others – teamwork, teaches others, customer service, leadership, negotiation, diversity
<b>Personal Qualities:</b> Responsibility, self-esteem, sociability, self-management, integrity and honesty.	<b>Information:</b> Acquires and uses information – acquisition, evaluation, interpretation, communication, computers
	<b>Systems:</b> Understands complex inter-relationships – monitors/corrects performance, improvement, design
	<b>Technology:</b> Works with a variety of technologies – selects and applies technology, troubleshooting

The Chancellors Office has made significant investments into curriculum and tools to teach workplace competencies under a framework called New World of Work (NWW). NWW is based on deep engagement with employers, which resulted in updating of the basic SCANS framework to include:

- Adaptability
- Analysis/Solution Mindset
- Collaboration
- Communication
- Digital Fluency
- Entrepreneurial Mindset
- Empathy
- Resilience
- Self-Awareness
- Social/Diversity Awareness.

Along with the updated definitions, NWW has developed curriculum toolkits, marketing/training materials, and a train-the-trainer model available for free or minimal cost to colleges or regional consortia.<sup>6</sup> Information on these skills can be tracked in

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<sup>6</sup> <https://www.newworldofwork.org/>

TopsPro Enterprise for K12 adult and through MIS community college noncredit programs, but not for credit CTE programs.

For AEBC, which targets individuals with barriers to both education and workforce success, incorporation of workplace or work-readiness competencies is critical for moving more low-income, disadvantaged adults towards career success. Therefore, it is important to build appropriate frameworks aligned to the needs of specific populations, such as new immigrants with low levels of literacy, formerly incarcerated adults, or the formerly homeless.

### Integrated Education and Training

Under WIOA, integrated education and training (IET) means a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for educational and career advancement.<sup>7</sup> IET represents a wide spectrum of services to build foundational, employability, and occupational skills simultaneously, recognizing that the barriers to workforce success for adult learners include basic math and English, spoken English, and work readiness along with technical or occupational competencies.

IET is a fundable strategy across all levels of service delivery in WIOA AEFLA Title II and Title I, and can include a wide variety of WIOA Title I career and training services as well as adult basic education and English language civics. Participants in IET programs are reportable under WIOA Title II in the National Reporting System, and states are strongly encouraged to invest in IET models that not only include foundational skills but also incorporate supportive services (IET+S). IET programs are considered integrated if they balance instruction across the three components (foundational skills, workforce preparation, workforce training), activities occur simultaneously, and they use occupationally-relevant materials for basic skills as well as workforce training activities.<sup>8</sup>

IET is compatible with a variety of approaches to integrated basic skills and technical education including vocational ESL (VESL), vocational adult basic education (VABE), and post-secondary contextualized basic skills or contextualized teaching and learning. It is aligned to integrated pathway models such as Washington's Integrated Basic Education and Skills Training Program (I-BEST), which integrates basic skills and technical training in the same classroom<sup>9</sup> and the California community college Career Advancement Academies (CAA) model, which includes integrated and contextualized basic skills, counseling support, cohorts, and CTE instruction leading to certification in a semester.

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<sup>7</sup> WIOA Title II Adult Education and Literacy. [www.wa.gov/esd/1stop/docs/wioa/WIOA\\_Title\\_II.doc](http://www.wa.gov/esd/1stop/docs/wioa/WIOA_Title_II.doc)

<sup>8</sup> CLASP; *Integrated Education and Training: Model Programs for Building Career Pathways for Participants at Every Skill Level*. (2016); <http://www.clasp.org/resources-and-publications/publication-1/WIOA-IET-Model-Programs.pdf>

<sup>9</sup> <https://www.sbctc.edu/colleges-staff/programs-services/i-best/>

IET programs can be flagged in TE, but there is no data flag in the community college data system.

## Measuring Skills Gains and Completion in CTE

While AEBG provides overall guidelines for skills gains and completion, the alignment with WIOA provides much more nuanced definitions. Given the complexity of the options provided under the federal framework, more explicit guidance is needed about the appropriate measures to capture to goals of AEBG.

### CTE Skills Gains

The WIOA indicators include measurable skills gains for participants in an education or training program that leads to a recognized post-secondary credential or employment, including:

- 1) Achievement of at least one educational functioning level of a participant who is receiving instruction below the post-secondary education level;
- 2) Attainment of a secondary school diploma or recognized equivalent;
- 3) 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;
- 4) 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; or
- 5) 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.<sup>10</sup>

Just like Titles I, III, and IV, AEFLA Title II adult literacy programs are intended to result in post-secondary credentials or employment and are subject to the measurable skills gain indicators *and* the post-exit outcome indicators. Additionally, there are three ways to measure achievement of a functional level for participants receiving instruction below the post-secondary level:

- 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.

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<sup>10</sup> 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>

- A functional level gain may also be reported for students who exit a program below the post-secondary level and enroll in post-secondary education and training.

The only exception to the above is for AEFLA Title II funded programs, which can also use achievement of a high school diploma or its equivalent as evidence of a level gain.

For AEBG, guidance needs to be developed about which of these measures are allowable, and if the measures should vary by type of provider, such as having K12 adult schools use testing and community college programs use Carnegie units.

## CTE Completion

WIOA recognizes four types of post-secondary credentials:

- Industry-recognized certificate or certification
- Certificate of completion of an apprenticeship
- A license recognized by the state or the federal government
- An associate, bachelor, or graduate degrees (graduate degrees Title IV VR Only)

No completion definition is provided for CTE adult school programs in either the AEBG legislation or in WIOA, other than a high school diploma or equivalent. WIOA further stipulates that high school equivalency should only be counted if the participant is also employed or enrolled in education/training program leading to a recognized post-secondary credential within one year after leaving program.

At this time, it is not possible to secure information on all of the post-secondary categories. For example, there is no comprehensive list of industry-recognized credentials, and national efforts to resolve this problem, such as the Credential Engine,<sup>11</sup> are based on the dilemma that industry recognition varies significantly both by occupation and by region.<sup>12</sup> Therefore, proxy measures must be used, such as certificates that are approved by the state agencies or by examining the employment outcomes of participants.

The Workforce Data Quality Campaign and the Workforce Credentials Coalition have been attempting for several years to secure access to certification data from third-party providers such as CompTIA, Certiport, and the National Association of Manufacturing. These efforts revealed that many credentialers do not capture sufficient information on their test-takers to create a reliable data match, and that there are significant costs associated with getting access to this information<sup>13</sup>.

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<sup>11</sup> [www.credentialengine.org/](http://www.credentialengine.org/)

<sup>12</sup> Muller., R. & Beatty. A. (2008). *Work Readines Certification and Industry Credentials: What Do State High School Policy Makers Need to Know?* Washington DC: Achieve  
<https://www.achieve.org/files/WorkReadinessCertificationandIndustryCredentials.pdf>

<sup>13</sup> Koch. G. (2014) Data Sharing Project: CompTIA Update.

[https://www.acteonline.org/uploadedFiles/Assets\\_and\\_Documents/Global/files/Policy/CompTIA%20Data%20Sharing%20Project%20Overview%2012-17-14.pdf](https://www.acteonline.org/uploadedFiles/Assets_and_Documents/Global/files/Policy/CompTIA%20Data%20Sharing%20Project%20Overview%2012-17-14.pdf)

Currently, Chancellor's Office-approved certificates are captured in the MIS data system, although some colleges also report their local certificates, and the number of colleges doing so will likely increase given that local certificates will be counted in the Strong Workforce Program incentive funding formula. Apprenticeship data is available for community college participants via a match with the Department of Apprenticeship Standards. While legislation has been passed that would match data for community college students with licenses offered by California's Department of Consumer Affairs, the agencies are still developing a protocol for the data exchange.

For AEBG, guidance needs to be developed about whether CTE completions should be tracked for K12 adult education providers and how post-secondary awards should be identified as industry-recognized.



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