



The Integrated English Literacy and Civics Education (IELCE) Program

Understanding Its Design and Challenges in
Meeting Immigrant Learners' Needs

Jacob Hofstetter
Alexis Cherewka

The Integrated English Literacy and Civics Education (IELCE) Program

Understanding Its Design and Challenges in Meeting Immigrant Learners' Needs

Jacob Hofstetter
Alexis Cherewka

Migration Policy Institute

February 2022

Contents

- Executive Summary** 1
- 1 Introduction** 3
- 2 The Purpose and Design of IELCE**..... 7
 - A. Integrated Education and Training in Section 243 Programs..... 8
 - B. Access to IET and Non-IET IELCE Programs under Section 243..... 10
 - C. Varying State Regulations for Section 243 IELCE Programs..... 11
- 3 The Implementation of IELCE: Effects on Providers, Students, and Potential Participants** 13
 - A. Challenges for Providers in Building and Maintaining IELCE-IET Programs..... 15
 - B. Who Is Served by IELCE Programs? 23
- 4 Recommendations and Conclusion** 29
- About the Authors** 36
- Acknowledgments** 37

Executive Summary

Supporting the successful integration of immigrants into American society is an important goal for the federal government, states, and localities, given the benefits for immigrants, their families, and society as a whole. State adult education systems, which receive significant funding from the federal government, are the primary source of key integration services such as English classes, citizenship preparation and civics courses, literacy programs, and some workforce development activities for adult immigrants. Although these programs have existed for decades, the passage of the *Workforce Innovation and Opportunity Act* (WIOA) in 2014 brought significant changes to adult education systems, including programs designed to advance immigrant integration.

Among these changes, WIOA established the Integrated English Literacy and Civics Education (IELCE) program, which is intended to promote economic, linguistic, and civic integration by helping adult immigrants and adult English Learners (ELs)¹ “achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens.” IELCE receives 12 percent of federal adult education funding and, unlike its predecessor (English Literacy and Civics Education, or EL/Civics), also carries an increased focus on employment outcomes for participants. As outlined under WIOA, IELCE programs must utilize Integrated Education and Training (IET), a service approach that combines adult education and workforce activities into linked courses focused on specific occupations.² When delivered with IET, IELCE programs combine English, civics, workforce preparation, and workforce training into a single program that is contextualized, concurrent, and leads to a recognized credential and/or employment. As laid out in the U.S. Department of Education’s regulations, however, while every IELCE provider must offer access to IET, not every participant in the provider’s programs must enroll in IET activities. This rule creates space for IELCE programs that offer standalone English and civics courses, alongside access to IET activities for those students interested in them.

The passage of WIOA in 2014 brought significant changes to adult education systems, including programs designed to advance immigrant integration.

The implementation of IELCE, which began in 2016, has led to the development of many innovative programs across the country that serve the objectives of increasing participants’ English proficiency along with economic and civic integration. Yet the reach of these programs, and especially their IET component, has been limited by relatively low enrollment and demand as well as barriers to participation. Drawing on analysis of available federal and state data and regulations on IELCE as well as interviews with adult

- 1 The terms English Learner (EL) and English Language Learner (ELL) are both used to describe individuals learning English as a second language. While the *Workforce Innovation and Opportunity Act* (WIOA) uses the term “ELs,” this report uses “ELs” throughout for consistency and simplicity. Because this study is focused on immigrant integration, it also uses “immigrants” in some places to describe the target population, while recognizing that some adult ELs, such as some Puerto Ricans, are not immigrants to the United States, and many immigrants speak English fluently or as their native language.
- 2 These requirements apply only to Integrated English Literacy and Civics Education (IELCE) programs funded under Section 243 of WIOA Title II, a nuance discussed in more depth in the body of this report.

education administrators and IELCE providers across eight states, this study identified the following key findings:

- ▶ **The number of students served in IELCE's IET activities is low compared to the number of students that IELCE serves overall.** Nationally, just 10 percent or slightly more of IELCE participants chose to participate in IET activities in program years 2017 through 2019. This share did, however, rise slightly over this period, both nationwide and in states analyzed for this project.
- ▶ **High entry requirements prevent many immigrants from participating in IET activities.** Advanced levels of English proficiency, a high school diploma or equivalent, and legal immigration status are all generally required to participate in IET activities. As a result, IET activities often exclude a large share of adult immigrants, including many who most need integration and workforce services.
- ▶ **There is limited demand for IET due to the time commitment required to participate, financial challenges for participants, and a lack of interest in these activities.** For those who work or parent full time, participating in time-intensive IET activities is often not feasible. In addition, many immigrants are not eligible for public income supports that may make it possible for native-born individuals, naturalized citizens, lawful permanent residents, and resettled refugees to forgo income if they want to participate. IELCE's focus on workforce training is also simply not in demand for many workers, older adults, parents, and other immigrants seeking integration services but not to pursue new career pathways or industry-specific credentials. These factors create recruitment challenges for IELCE providers, contribute to low enrollment in the IELCE's IET activities, and cast doubt on both the program's premise and sustainability.
- ▶ **Though basic features such as English instruction and access to IET activities exist across all IELCE programs, IELCE and IELCE-IET program designs vary considerably across states and local providers.** State regulations and processes, the characteristics of local immigrant populations, geographic and labor market factors, and providers' previous experience in developing partnerships with workforce development organizations all contribute to this variation, and many states and providers have developed innovative practices to respond to these contextual factors. Confusion about IELCE's requirements has also contributed to this variation, with some states not being aware that programs only have to offer access to IET or that there is flexibility available for different types of instruction in non-IET cohorts.
- ▶ **Many adult education providers have found it challenging to build and maintain IELCE-IET programs due to low enrollment, the resource-intensive nature of IET activities, geographic limitations, and difficulties forming partnerships with workforce training institutions.** These effects have diminished somewhat due to the Department of Education's interpretation of the IET requirement that IELCE providers must make IET available to all students, but not all IELCE students must participate in IET. This regulation has made IELCE more flexible and allowed some states to retain some of their previous programming focused on social and civic integration. At the same time, because IELCE-IET programs often give preference to certain job sectors and geographical areas, and because larger institutions such as community colleges and school districts are often more likely to have the capacity to provide IET than community-based organizations, the program inherently favors some providers over others.

These findings suggest that there are some benefits to linking workforce activities and integration-focused adult education services through IELCE. Yet, the program faces serious challenges related to accessibility for many students who most need integration support, practicality for providers, and demand for such services. Similarly, the limited reach of IELCE's IET component calls into question whether

IET should be the central feature of 12 percent of the federal government's investment in adult education. Reforming IELCE to accommodate a more flexible, equity-driven approach aimed at including students from all English and educational levels could elicit higher participation in the program and more sustainable programming for adult education providers. The study's findings carry important considerations for the potential reauthorization of WIOA, efforts to bridge adult education and workforce services via IET, and the feasibility of such approaches for immigrants and adult ELs. Federal and state policymakers should give serious consideration to whether IELCE, and WIOA more broadly, crowds out or limits adult education providers' ability to address immigrants' civic and social integration needs. Policymakers should also address how the adult education system could develop new or expand existing funding streams and programmatic space to better support immigrants' efforts to grow and flourish as members of American society.

The program faces serious challenges related to accessibility for many students who most need integration support, practicality for providers, and demand for such services.

1 Introduction

There is widespread consensus and evidence that the integration of immigrants and refugees into American society is beneficial not only for the United States but also for the economic and social well-being of immigrants and their families. Integration increases immigrants' economic mobility, supports immigrant parents in raising a thriving second generation of Americans, and empowers immigrants to contribute to the social and civic fabric of the United States. Although the integration process occurs organically at the individual and community levels, public programs can increase the speed and scale at which newcomers integrate into U.S. society.

The sociodemographic profile of the immigrant population in the United States is markedly different from that of the native-born population, displaying overlapping and compounding barriers to the civic, linguistic, and economic integration of many immigrant adults. Yet, the country's adult immigrant population is not monolithic. It includes both high-income individuals with advanced degrees and low-income individuals with little to no formal education. On one hand, a large majority (64 percent) of immigrant adults were employed in 2015–19, an employment rate slightly higher than that of the native-born population (61 percent), and roughly two-thirds (64 percent) of immigrant adults were middle or high income (i.e., above 200 percent of the federal poverty level). In addition, slightly more than half (51 percent) of immigrants reported being proficient in English, and the share of immigrants with a bachelor's degree or more was nearly equivalent to that of the native-born population (31 percent and 32 percent, respectively).³

³ Migration Policy Institute (MPI) tabulation of 2015–19 pooled data from the U.S. Census Bureau's annual American Community Survey (ACS).

Yet a significant share of immigrant adults face challenges to their integration and economic mobility. Immigrants were more likely to have lower levels of formal education, compared to native-born adults, and even more serious disparities are apparent when looking solely at those who have a low income. For example, immigrant adults were three times more likely to lack a high school diploma or equivalent compared to native-born adults in 2015–19 (28 percent vs. 9 percent), and nearly one in five immigrant adults (18 percent, or roughly 7 million individuals) had less than a 9th grade level of education, compared to just 3 percent of native-born adults. Approximately half of immigrant adults (49 percent) were also Limited English Proficient (LEP), and more than one in four (28 percent) immigrant adults reported they spoke English “not well” or “not at all” in the U.S. Census Bureau’s American Community Survey. Immigrant adults were also more likely to be employed in low-skilled jobs than native-born adults (54 percent vs. 43 percent).⁴

Taken together, these data point to a need for various educational and workforce services, such as English instruction, civics courses, adult literacy programs, and pathways to workforce training and postsecondary education, to support the linguistic, civic, and economic integration of many immigrant adults. There is significant overlap between these needs and the many established government programs intended to support the economic mobility, educational attainment, and skill attainment of native-born adults. However, challenges unique to the immigrant population related to English proficiency, lower levels of formal education, and a lack of experience navigating American society mean that intentional and tailored efforts to serve immigrants are also necessary in order to ensure they have equitable access to the above-noted services and the benefits they offer.

Across the United States, the adult education system is the primary vehicle through which adult immigrants can access many key services promoting integration, such as those that offer support with learning English, better understanding U.S. civics and culture, and developing knowledge and skills that lead to higher-wage employment. Through the broader offerings of the adult education system, immigrants can also access adult basic education (ABE) courses, high school equivalency classes, family literacy programs, and some workforce programs, all of which further adult immigrants’ integration. Immigrants also represent an important target population for adult education system services, especially given that half of adult learners in the United States are immigrants, even though immigrants represent approximately 17 percent of the total adult population.⁵ But even with their diverse offerings, adult education programs, which states administer and both state and federal funding streams support, reach only a small portion of all immigrants and adult English Learners (ELs) who could benefit from

Adult education programs ... reach only a small portion of all immigrants and adult English Learners who could benefit from participation.

-
- 4 MPI tabulation of pooled ACS data from 2015–19. The MPI methodology for job skill classification draws on the U.S. Department of Labor’s online database of occupational profiles, O*NET, which classifies occupations by educational requirements, among other criteria, segmenting them into “job zones.” Based on this categorization, MPI assigns jobs to three skill levels: High-skilled jobs require at least a bachelor’s degree, such as medical doctors and scientists (job zone 4 and 5). Middle-skilled jobs require some postsecondary education or training (i.e., an associate degree or long-term on-the-job training or vocational training); these include registered nurses, electricians, and teacher assistants (job zone 3). Low-skilled jobs require a high school degree or less, and little to moderate on-the-job training, such as home health aides, construction laborers, and drivers (job zones 1 and 2).
- 5 MPI tabulation of pooled ACS data from 2015–19. Adult learners are defined as those who have less than a high school diploma or equivalent or who are Limited English Proficient.

participation.⁶ For example, even though there are almost 23.3 million adults considered LEP in the United States, only 480,000 learners, or approximately 2.1 percent of LEP adults, were served in English Language Acquisition (ELA) programs supported by federally funded adult education programs from 2018 to 2019.⁷

The adult education system itself has undergone substantial changes since Congress passed the *Workforce Innovation and Opportunity Act* (WIOA) in 2014 that have affected the type of integration services available to immigrants. WIOA Title II, the portion of the law that governs adult education, initiated major shifts in the design and evaluation of adult education programs—and, arguably, even their purpose. On a broad level, the law called for further alignment of the adult education and workforce systems (the latter of which is largely governed by WIOA Title I), emphasizing, for example, the use of Integrated Education and Training (IET), an educational approach that combines adult education services and workforce training into a concurrent program that leads to a credential or employment. At the program level, the law specifically required Title II providers to meet the same performance accountability measures as workforce training programs—such as those related to participants' employment, wage gain, and postsecondary and employer satisfaction outcomes—despite the different education profiles, needs, and goals of participants in the two types of programs.

WIOA Title II, also known as the *Adult Education and Family Literacy Act* (AEFLA), instituted other considerable changes for immigrants seeking integration-related services, such as English and civics courses, as well as for providers managing those programs. Prior to WIOA's passage, English Literacy and Civics Education (EL/Civics) was the primary federally funded program through which immigrants could access educational services to support their linguistic and civic integration into the United States.⁸ The U.S. Department of Education administered EL/Civics, which began in 1999, in order to help "states and communities provide Limited English Proficient adults with expanded access to high-quality English literacy programs linked to civics education."⁹ Because Congress annually appropriated funds for EL/Civics, the program was at risk of losing funding every year during the federal government's annual budget process, although Congress maintained the program's annual funding from 1999 until the passage of WIOA. The services provided under EL/Civics varied widely from state to state and from provider to provider as programs served diverse student populations including refugees, older adults, and migrant farmworkers, and supported a wide range of

6 Margie McHugh and Catrina Dooxsee, *English Plus Integration: An Instructional Paradigm for Immigrant Adult Learners to Support Integration* (Washington, DC: MPI, 2018).

7 MPI tabulation of 2015–19 pooled ACS data and data from U.S. Department of Education, National Reporting System for Adult Education (NRS), "Table 3: Participants by Program Type and Age," accessed September 17, 2021.

8 This analysis uses the phrase "civic integration" to refer to the broader range of political, social, and civic integration outcomes that adult education services may help immigrants to achieve. The authors of this report chose to use the phrase "civic integration" due to the use of the phrase "civics" in the title of IELCE, the integration framework introduced in the Network for Integrating New Americans initiative, and California's EL Civics Civic Objectives and Additional Assessment Plans (COAAPs), which address a range of political, social, and civic integration outcomes. See World Education, "Networks for Integrating New Americans," accessed January 15, 2021; Comprehensive Adult Student Assessment System (CASAS), "California Civic Participation and IELCE," accessed January 15, 2021. Other sources use the term "social integration" for this concept. See, for example, ALLIES, "Immigrant Integration Framework: From English Learning to Full Participation" (white paper, ALLIES, 2017). The use of "civic integration" in this report does not refer solely to the common conception of civics as courses that teach American history, politics, and often prepare students for naturalization. Instead, the authors intend this phrase to encompass all educational services to immigrant adults that provide knowledge and skills (including contextualized English) related to economic security, children's education, health and well-being, civic and community engagement, naturalization, and credentials and residency and as laid out in the ALLIES framework and California's COAAPs.

9 U.S. Department of Education, Office of Vocational and Adult Education, "Programs: English Literacy and Civics Education Demonstration Grants Program," updated March 16, 2005.

integration services such as family literacy and citizenship preparation.¹⁰ The flexibility of EL/Civics' funding allowed learners of all English proficiency levels and educational backgrounds to participate, and by emphasizing civics education, EL/Civics responded to adult ELs' and immigrants' broader needs as parents, workers, and community members.¹¹

Under WIOA, however, EL/Civics was converted into Integrated English Literacy and Civics Education (IELCE), which can be funded under either Section 231(b) or Section 243 of WIOA Title II's framework. Unlike EL/Civics, Section 243 IELCE programming receives a dedicated annual funding stream, but this guaranteed funding also comes with a narrowed focus on employment and economic outcomes for participants. Under Section 243, IELCE programs must provide in a single program English and civics instruction as well as workforce training. Section 243 IELCE programs must also provide access to IET.

The IET requirement of IELCE has introduced significant changes and challenges for systems, providers, and participants, through its attempts to bridge adult education and workforce systems, its departure from the program that preceded IELCE, its demands on adult education providers, and its inaccessibility and/or impracticality for many students seeking integration services. To examine these changes and challenges, this report first lays out the purpose and design of IELCE programs and then, in Section 3, explores the initial and ongoing impacts of the shift to IELCE for adult education systems, providers, and adult immigrants seeking integration services. Finally, Section 4 discusses how the federal and state governments could design or permit additional integration programs that complement IELCE in order to address a wider array of integration needs beyond those related solely to employment and economic advancement.

BOX 1 About This Study

There have been no significant public studies of IELCE, nor has there been extensive research on the effectiveness of integrated education and training activities with ELs or outside of community college settings. This exploratory research study aims to provide preliminary evidence on the implementation process of IELCE, especially IELCE-IET. The research focused on the transition from EL/Civics to IELCE for adult education stakeholders, and the interpretation and implementation of IELCE at the federal, state, and local levels. Finally, the research scope was limited to eight states: California, Illinois, New York, Pennsylvania, Maryland, North Carolina, Washington, and Virginia. These states were selected to represent diverse contexts for IELCE implementation based on the size of their immigrant population (including both top immigrant destination states and newer destinations), geography, and type of state adult education system (e.g., state department of education, state community college system).

The authors conducted 23 semi-structured interviews with adult education providers, state policymakers, and other stakeholders during the summer and fall of 2020. In order to encourage interviewees to speak openly and because some have ongoing connections to state adult education agencies, these interviews were conducted with the promise of anonymity, and thus this study does not cite individuals by name or organization unless they gave the authors explicit permission to do so. The authors conducted thematic

10 Michelle Tolbert, *English Literacy and Civics Education for Adult Learners: Special Policy Update* (Washington, DC: National Institute for Literacy, 2001).

11 McHugh and Doxsee, *English Plus Integration*.

BOX 1 (cont.) About This Study

analysis of the information gathered in these interviews, identifying both overall patterns and cases that contrasted the most common trends.

This study also involved the analysis of key documents, including related federal regulations and guidance, WIOA state plans (combined or unified), the most recently available state requests for proposals for IELCE, and the annual narrative reports that state adult education agencies submit to the U.S. Department of Education's Office of Career, Technical, and Adult Education (OCTAE). Finally, this study draws on additional, quantitative information from the National Reporting System for Adult Education (NRS), which is the federal database through which adult education programming metrics are reported, and state-supplied data sets on IELCE participants.

Sources: Kelley Borradaile, Alina Martinez, Peter Schochet, and Melanie Ali, *Adult Education Strategies: Identifying and Building Evidence of Effectiveness* (Washington, DC: Institute of Educational Sciences, 2021); Esther Prins et al., *Career Pathways Programming for Adult Learners in Chicago, Houston, and Miami: Final Report* (University Park, PA: Institute for the Study of Adult Literacy, 2018); Michael Quinn Patton, *Qualitative Research & Evaluation Methods: Integrating Theory and Practice*, 4th ed. (Thousand Oaks, CA: SAGE Publications, Inc., 2015).

2 The Purpose and Design of IELCE

IELCE's purpose under WIOA Title II is to support the linguistic, economic, and civic integration of immigrants. Section 203 of WIOA lays out this role, defining IELCE as "education services provided to English language learners who are adults" that "enable such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States."¹² Although sharing some characteristics with ELA programs, IELCE's stated goal to support immigrants' integration into the United States sets it apart from ELA courses, whose purpose is limited to helping adults learn English or, as stated in WIOA, to "achieve competence in reading, writing, speaking, and comprehension of the English language."¹³ Under WIOA Title II, IELCE can exist in two forms: Section 231(b) and Section 243, which refer to the two segments of the law that can govern and fund the program. These versions of IELCE share the same overarching goal, as stated above, but they differ in whether they are required to pair workforce training with English and civics instruction and are awarded through separate competitions.

Under Section 231(b), state adult education agencies may designate IELCE as a "required local activity" for eligible providers, which states can choose to fund via competition through their broader pool of federal adult education funds or through their own state funds. The goals of Section 231(b) IELCE programs mirror the larger goals of IELCE to promote linguistic, economic, and civic integration for adult ELs, and such programs must include combined instruction in English and civics but not workforce training. The flexibility of Section 231(b) IELCE programs in addressing integration knowledge and skills resembles the purpose and design of EL/Civics programs. Yet as with other WIOA Title II programs that can receive support under Section 231(b), IELCE receives no guaranteed funding each year, and states are not required to reserve any

¹² *Workforce Innovation and Opportunity Act of 2014* (WIOA), Public Law 113–128 (2014): 1611.

¹³ WIOA, 1610. This report uses "English Language Acquisition (ELA)" in lieu of other terms such as "English as a Second Language (ESL)" because ELA is the name WIOA gives to such services.

of their federal adult education funds to support such programming. Consequently, no state guarantees the existence, let alone the regular funding, of such programs. This framework contrasts with Section 243 IELCE programs, which exist in every state and receive guaranteed funding but also carry stricter requirements in terms of their goals and design. Given the national reach and impact of this dedicated funding, this report's analysis focuses exclusively on IELCE programs funded under Section 243 of WIOA.

Section 243 IELCE programs across the country receive a dedicated 12-percent annual share of WIOA Title II funding but also have a more deliberate focus on workforce and employment outcomes for their participants, in addition to the broader goals laid out for the program in Section 203. This focus on immigrants' economic integration is evident in one of the stated goals for Section 243 IELCE programs, which is to "prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency."¹⁴ Section 243 also requires greater collaboration between adult education and workforce development providers to deliver IELCE programs, mandating that all programs "integrate with the local workforce development system and its functions to carry out the activities of the program."¹⁵ Within this framework, IELCE must also include IET activities as part of its programming.

A. *Integrated Education and Training in Section 243 Programs*

If funded under Section 243, IELCE programs must be delivered in "combination with integrated education and training activities."¹⁶ As Box 2 details, IET refers to a service approach in which adult education, workforce preparation, and workforce training are delivered at the same time and in a complementary manner. In the context of IELCE, IET represents the method through which programs combine English and civics with workforce preparation and training. In this approach, English and civics instruction is delivered contextually and concurrently with workforce activities that lead to a credential related to a career pathway or specific job.

On a practical level, the use of IET should mean that workforce training activities are offered in a way that is accessible to ELs, the English and civics instruction are tailored to advance ELs' training, and all three components are delivered simultaneously as part of one program. For example, an IELCE-IET program for a Certified Nursing Assistant (CNA) certification might include instruction in English related to anatomy and the medical field, civics content that explains the U.S. health-care system and cultural expectations of medical care, and training for a CNA certification that is delivered at a pace and English level suitable for EL participants.

IET refers to a service approach in which adult education, workforce preparation, and workforce training are delivered at the same time and in a complementary manner.

¹⁴ WIOA, 1624.

¹⁵ WIOA, 1624.

¹⁶ WIOA, 1624.

Depending on state regulations, IELCE providers can arrange and design IELCE-IET programs using four different models, all of which were described in the interviews the authors conducted for this study. These models, first observed by researchers in IET programs in Washington State,¹⁷ are:

- ▶ **Model 1: Nonintegrated instruction.** This model contains separate instruction in which the English instructor plays a supporting role, and the workforce training instruction remains unchanged.¹⁸ For example, students participate in a CNA job-training program open to all adult learners, with a supplemental English and civics support class taught separately.
- ▶ **Model 2: Nonintegrated instruction with separate, contextualized basic skills.** While no changes are made to the workforce training curriculum, this model includes collaboration between the training instructor and English instructor to integrate English instruction needs. Under this approach, a CNA instructor and English language instructor may have meetings to determine how to best support occupational training, but the training's curriculum would remain unchanged.
- ▶ **Model 3: Partially integrated instruction.** Programs using this model consist of a modified training curriculum based on participants' English instructional needs, and the English and civics instruction is more prominent in the course. For example, the CNA training curriculum mentioned above would be modified to support English and civics instruction.
- ▶ **Model 4: Fully integrated instruction.** This model involves the joint modification of job-training curricula based on EL needs and calls for interwoven English and occupational training instruction. Through this approach, the CNA trainer and English instructor assume equal roles, both contributing to the curriculum and instruction that integrates the occupational training with English and civics instruction.

The majority of programs examined for this analysis would be classified as Model 2 or Model 3, as adult education providers often collaborated with occupational trainers to offer contextualized support. However, the training curriculum generally appeared unchanged, and much of the teaching occurred separately due to several challenges related to partnerships between adult education and workforce development entities discussed in Section 3. In the states examined for this project, many IET activities for IELCE focused on the health-care field, whereas other IET activities highlighted in interviews included programs (and certifications) for dental hygiene, customer service, textiles, commercial driver's licenses, home health care, and welding. Due to the large number of credentials, relatively high wages, and consistent demand for workers, the manufacturing and health-care fields lend themselves to IET, more so than many other industries do.¹⁹ For the workforce training component of IET activities, some providers, such as community colleges, directly enroll IELCE participants in their own workforce programs. Others, such as community-based organizations (CBOs), have developed partnerships with WIOA Title I providers or employers in a process described in more detail in Section 3.

17 John Wachen, Davis Jenkins, and Michelle Van Noy, *How I-BEST Works: Findings from a Field Study of Washington State's Integrated Basic Education and Skills Training Program* (New York: Community College Research Center, Teachers College, Columbia University, 2010).

18 Although these models only describe occupational training, the workforce component of IET could also include other types of training such as apprenticeship or entrepreneurship training.

19 Authors' interview with adult education researcher, July 28, 2020.

BOX 2**Integrated Education and Training (IET) Activities under WIOA Title II**

Under WIOA, IET activities are defined as “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 the purpose of educational and career advancement.” Adult education and literacy activities refer to a range of programs, including English language acquisition activities, family literacy programs, and high school equivalency coursework. Workforce preparation activities are “activities, programs, or services that are designed to help an individual acquire a combination of basic academic skills, critical thinking, digital literacy, and self-management skills.” Support services such as child care and career navigation have also proved to be critical to ensuring students’ success in IET.

The workforce training component of IET can be offered through the provider or with a partner, and a substantial number of community or technical colleges fulfill this role. The workforce training should be in an in-demand industry, sector, or occupation, in accordance with the state’s WIOA plan. As of 2017, the most common occupations included Certified Nursing Assistant (CNA), welder, and office specialist (general). Typically, support services such as career navigation and digital literacy instruction are offered through adult education providers, and workforce partners supply job development and placement assistance.

The IET model is based on the widely recognized Integrated Basic Education and Skills Training (I-BEST) model that combines “the teaching of basic skills and technical content” from the Washington State Board for Community and Technical Colleges, as well as the notion of the “tipping point.” The “tipping point” refers to the improved educational and labor market student outcomes (e.g., more college credits, higher earnings) that have been linked to at least one year of college-level credit and an occupational credential, including for ELs. In fact, EL participation in I-BEST programs has led to several improved educational outcomes, including earning college credit, earning awards, and achieving point gains on basic skills tests.

Although some ELs in IET activities have demonstrated positive outcomes, questions remain about this model’s effectiveness for adult ELs, especially for those with limited formal schooling as most participants in studies on I-BEST had secondary degrees. Furthermore, several studies on I-BEST included only a limited share of participants who were ELs and, specifically, ELs without a high school credential. Additionally, earlier studies on student outcomes have indicated inequitable results for ELs without high school credentials. Consequently, although IET activities have had promising results for native-born participants and some adult ELs, more research is needed to determine these programs’ effectiveness for ELs with limited formal schooling.

Sources: Kenneth A. Couch, Matthew B. Ross, and Jessica Vavrek, “Career Pathways and Integrated Instruction: A National Program Review of I-BEST Implementations,” *Journal of Labor Research* 39, no. 1 (2019): 99–125; David Prince and David Jenkins, *Building Pathways to Success for Low-Skill Adult Students: Lessons from Community College Policy and Practice from a Statewide Longitudinal Tracking Study* (New York: Community College Research Center, Teachers College, Columbia University, 2005); Judy Mortrude, *Integrated Education and Training: A Career Pathways Policy & Practice* (Washington DC: Center for Law and Social Policy, 2017); *Workforce Innovation and Opportunity Act of 2014*, Public Law 113–128 (2014); David Jenkins, Matthew Zeidenberg, and Gregory Kienzl, “Building Bridges to Postsecondary Training for Low-Skill Adults: Outcomes of Washington’s State’s I-BEST Program” (brief no. 42, Community College Research Center, Teachers College, Columbia University, New York, May 2009).

B. Access to IET and Non-IET IELCE Programs under Section 243

There is, however, a key nuance to the IET requirement for IELCE programs funded under WIOA Section 243. Although WIOA states that IELCE should be delivered “in combination” with IET, this requirement does not mean that every participant in IELCE programs must be enrolled in IET. Since the passage of WIOA, OCTAE, the office within the U.S. Department of Education that manages adult education on the federal level, has interpreted Section 243’s language to mean that the IET requirement pertains to the provider rather than to the student. In other words, adult learners in IELCE programs do not have to participate in IET but must have access to it.²⁰ This interpretation has enabled the creation of IELCE courses and cohorts funded under Section 243, called “non-IET IELCE” in this analysis, that deliver English and civics instruction (along with workforce preparation activities in some cases) while only providing access to IET for interested students. In terms of the theoretical IELCE program mentioned above, this regulation has meant that the same IELCE program could offer a CNA IET component as part of an IELCE program but also use Section 243 funding to provide broader English and civics instruction, as long as interested and eligible students have access to the IET activity.

The IET requirement pertains to the provider rather than to the student. In other words, adult learners in IELCE programs do not have to participate in IET but must have access to it.

Similar to the programs’ IET component, program providers interviewed for this study described designing their courses in ways that varied significantly. Some non-IET IELCE courses were more akin to EL/Civics programs, providing a range of instruction on civic and social integration in standalone classes, while other providers used these non-IET Section 243 funds to supplement their ELA programs. In addition, some IELCE providers used Section 243 funding to develop pathways for their IET activities, creating what is often termed “bridge programs” to boost specialized English proficiency or other workforce preparation courses that, while not requiring enrollment in IET activities, put students on a path to participating in a workforce training program.

C. Varying State Regulations for Section 243 IELCE Programs

Although WIOA Title II lays out the basic design, goals, and purpose of IELCE programs, state adult education agencies have also implemented IELCE and its IET component in different ways. As laid out in WIOA Section 243, states’ adult education agencies receive varying levels of funding for IELCE, depending on the size and recent growth of their immigrant population, although every state is guaranteed at least \$60,000 in funding.²¹ State adult education agencies are responsible for creating guidelines for IELCE programs, while still following the program requirements set out by WIOA and OCTAE. These agencies are also responsible for distributing funds to local providers, which can include a range of institutions such as CBOs, school districts, community and technical colleges, and libraries. The providers are then responsible for designing programs, recruiting students, delivering instruction, and reporting program results to their state agencies.

20 Chris Coro, “Unpacking the Regulations Subpart G- Integrated English Literacy and Civics Education Program” (presentation at the National Meeting for Adult Education State Directors, 2016).

21 WIOA, 1624.

Variation in states' IELCE programming is unsurprising given states' need to operationalize federal guidance and WIOA's requirements for IELCE in a way that suits their specific adult education systems, which are often managed through education or labor agencies or community college systems. As states have adopted IELCE into their specific context of English language and civics instruction, adult education, and IET, some (such as Washington and California) have fit IELCE into existing frameworks, whereas other states have started IELCE programs and IET activities from scratch. In the states examined for this report, there are substantial differences in the structure and funding of IELCE programs, most notably regarding states' interpretations of the program's IET requirement and their regulations on the use of federal adult education funds to pay for training and workforce activities.

IELCE-IET Enrollment Requirements

OCTAE's regulations clearly state that IELCE programs do not require all participants to be enrolled in IET activities but, rather, that all participants must have access to IET. Despite this flexibility, some states require all IELCE participants to be enrolled in IET activities. Of the states analyzed for this project, New York and Washington both require all IELCE participants to be enrolled in IET activities.²² In contrast, California, Maryland, North Carolina, and Virginia only require providers to offer access to IET activities, and Pennsylvania uniquely requires 50 percent of all IELCE participants in any program to be enrolled in IET.²³ Some states also have unofficial IET enrollment targets but either do not state these publicly and/or do not hold providers to an exact number or share of participants.²⁴

States may require all IELCE participants to enroll in IET in order to ensure that all participants can access workforce development services or to leverage IET infrastructure in their states, such as Washington State's I-BEST programming. Yet, the state-level IET requirement can also dramatically affect what local IELCE programs look like and which adult EL populations can participate. Requiring all students to enroll in IET can put IELCE entirely out of reach for people without specific workforce goals related to the program and those without sufficient English, legal status, or education levels to participate in workforce training. Section 3.B of this report discusses these issues in detail.

Use of Section 243 Funding for Workforce Development Activities

States also differ in their regulations regarding whether providers can use their Section 243 IELCE funding to pay for the training provided to IELCE-IET students. New York does not permit IELCE providers to use

22 New York State Education Department, "Workforce Innovation and Opportunity Act Title II and Welfare Education Program Funding" (Request for Proposal GC18-016, Albany, NY, accessed July 25, 2020); Washington State Board for Community and Technical Colleges, "Washington State 2017-2022 Adult Basic Education and Integrated English Literacy and Civics Education: 2017-2022 Grant Guidelines" (guidance document, January 2017).

23 Maryland Department of Labor, "FY 2021 MD Labor-AIS IELCE/IET Competitive Grant Application: Consolidated Adult Education and Family Literacy Services" (grant applications, 2020); North Carolina Community College System, *North Carolina Title II Adult Education and Family Literacy Act: Fiscal Years 2018 – 2021 Competitive Grant Application Package* (Raleigh, NC: Academic and Program Services/College and Career Readiness, 2018); Pennsylvania Department of Education, "Checklist for Section 243 Integrated English Language and Civics Education Program" (checklist, Pennsylvania Department of Education, Harrisburg, PA, March 2020); Virginia Department of Education, "Adult Education: 2020-2023 Competitive Grant Application Package," accessed September 2, 2020; California Department of Education, "Workforce Innovation and Opportunity Act Title II: Adult Education and Family Literacy Act (Public Law 113-128)" (request for applications, California Department of Education, Sacramento, CA, November 2019).

24 Authors' interview with adult education administrator, July 23, 2020.

WIOA Title II funds for training activities, instead requiring providers to seek other sources of support for those activities.²⁵ California, Maryland, Pennsylvania, and Virginia all allow WIOA Title II funds to be used for training and other workforce activities but note that IELCE providers should seek other funding sources to support these services.²⁶

WIOA allows Title II funds to be used for training under IELCE, but using these funds, which are intended for adult education purposes, cuts into funding that could be used for more English, civics, and workforce preparation activities, especially given that workforce training is generally more expensive than English and civics instruction. In addition, WIOA Title I adult funds are also intended to support workforce training, and these funds carry a requirement to provide priority service to adult ELs. Some administrators interviewed for this project noted that being able to use Section 243 funding to pay for workforce training was beneficial as it enabled them to fund a limited number of participants who would have otherwise been unable to participate given their ineligibility for WIOA Title I services.

Use of State-Supported Curricula

States' IELCE regulations also differ in some programmatic elements, which can lead to significant variation in IELCE programming. New York, for example, requires IELCE providers to align their IET activities with one of the CareerKits from the New York State Department of Education/City University of New York (instructional programs focused on one of ten industry sectors) and to specify which career pathway the IELCE program addresses.²⁷ California has its own unique Civic Objectives and Additional Assessment Plans (COAPPs) that IELCE programs can use to show student progress for integration-related outcomes. Other states, such as Virginia and Washington, have fit IELCE-IET programs into existing IET activities and models.

3 The Implementation of IELCE: Effects on Providers, Students, and Potential Participants

Federal and state regulations around IELCE have created significant variation across programs, and the implementation of these provisions has come with serious challenges for students, systems, and providers, raising concerns about IELCE's practicality, sustainability, and potential inequities. The creation of IELCE under WIOA Title II reshaped a significant portion of the federal investment in immigrant integration via adult education. These changes transformed an existing integration program (EL/Civics) into IELCE, which moved away from an approach that addressed broader needs related to social and civic integration (such as parents seeking to support their children's education or newcomers seeking to better understand how to navigate U.S. systems and culture) and toward a more explicit focus on employment and economic

25 New York State Education Department, "Workforce Innovation and Opportunity Act Title II and Welfare Education Program Funding."

26 Maryland Department of Labor, "FY 2021 MD Labor-AIS IELCE/IET Competitive Grant Application"; Pennsylvania Department of Education, "Request for Grant Application Guidelines"; Virginia Department of Education, "Adult Education"; California Department of Education, "Workforce Innovation and Opportunity Act."

27 New York State Education Department, "Workforce Innovation and Opportunity Act Title II and Welfare Education Program Funding."

integration.²⁸ In addition, IELCE directly promotes the integration of the adult education and workforce systems, both in its stated goals and its required use of IET in IELCE programs. This shift mirrored larger trends within the adult education system overall—namely, the increasing workforce and postsecondary focus of educational services that were formerly more flexible and aligned with broader adult learning goals.²⁹

Consequently, the positive and negative impacts of the implementation of IELCE, particularly its IET component, speak not only to the effectiveness of one of the primary integration programs available to immigrants via the adult education system but also to the future prospects of expanding the intertwining of adult education and workforce training to other education programming for adult ELs and immigrants. Given these potential implications, this analysis focuses primarily on the implementation of the IET component of IELCE, rather than on its English and civics components, even though most students participating in IELCE programs nationwide are not enrolled in IET activities.³⁰

IELCE's IET requirement has brought significant changes and challenges for systems, providers, and participants through its linking of the adult education and workforce development systems.

IELCE's IET requirement has brought significant changes and challenges for systems, providers, and participants through its linking of the adult education and workforce development systems, its departure from the program that preceded IELCE, its demands on adult education providers, and its inaccessibility and/or impracticality for many students seeking integration services. This section examines these changes and challenges, first by describing many difficulties that adult education providers have faced in building and maintaining IELCE programs, then concluding with a discussion of the impacts of IELCE and IELCE-IET on students and potential participants.

28 From this point on in this report, all references to IELCE, IELCE programs, or IELCE programming refer specifically to IELCE programs funded under Section 243 of WIOA, unless otherwise noted.

29 Aliza Belzer, "Focusing or Narrowing: Trade-Offs in the Development of Adult Basic Education, 1991–2015," *New Directions for Adult and Continuing Education* 155 (2017): 11–18.

30 U.S. Department of Education, Office of Career, Technical, and Adult Education, "Integrated English Literacy and Civics Education: Under Section 243 of the Workforce Innovation and Opportunity Act" (Biennial Integrated English Literacy and Civics Education Report to Congress, U.S. Department of Education, accessed September 16, 2021).

BOX 3**The Transition to IELCE and the Building Opportunities Project**

Although WIOA was passed in 2014, IELCE was not fully implemented until 2016, creating a transition period in which providers and state administrators adjusted to deliver the program. Because IELCE was a dramatic departure from EL/Civics and introduced complex requirements regarding the development of IET activities, many providers and even adult education agencies in the states examined for this project initially struggled to implement the program. In the transition to IELCE, state adult education agencies provided technical assistance to providers while also receiving guidance from the federal Office of Career, Technical, and Adult Education (OCTAE) on how to comply with WIOA's new regulations for IELCE and their entire adult education systems as well. At the same time, providers who wished to receive IELCE funding were required to design IELCE programs that complied with the program's IET requirement, while also recruiting students and serving their existing student population.

OCTAE attempted to provide more guidance and technical assistance to states and providers through the Building Opportunities project, which began in June 2016. As laid out in the project's official description, OCTAE intended the project to provide technical assistance to help state providers and adult education agencies "understand and implement the IELCE activities, and programs in accordance with the legislation and final regulations in WIOA." The Manhattan Strategy Group (MSG), a management consulting firm, received the contract from OCTAE to manage the project with the expectation that MSG would highlight promising practices across states, provide technical assistance to those implementing IELCE, and produce case studies of promising practices and a final report. Facilitated through the Literacy Information and Communication System (LINCS) community, which is a collection of adult education resources managed by OCTAE, the project centralized general resources for IELCE providers on English, civics, and workforce instruction.

As part of Building Opportunities, MSG also developed a Bright Spots program to highlight best practices to help providers operationalize their programs to align with IELCE regulations. A Bright Spots Preview in February 2020 revealed three IELCE implementation patterns related to effective partnerships, elements of curriculum and program design, and lessons learned regarding student recruitment and retention. Bright Spots also promoted sustained partnerships with workforce community partners, which enhanced curriculum, and with employers, who, in turn, assisted with student retention and recruitment. Effective program design and instruction also included pathways directly connected to employment, bridges to integrated programming for lower-level learners, and the use of coteaching and contextualized, work-oriented teaching. The resources collected on the Building Opportunities page include a checklist for IELCE and IET development for providers and a self-assessment tool. Yet, as of this writing, the page does not include any of the planned case studies, in-depth profiles, or the final report.

Sources: OCTAE, "[Building Opportunities through Integrated English Literacy and Civics Education \(IELCE\)](#)," accessed September 17, 2021; Lisa Le Fevre and Megan Janicki, "[Building Opportunities for Integrated English Literacy and Civics Education \(IELCE\): Bright Spots Overview](#)," LINCS Communications, January 27, 2020.

A. *Challenges for Providers in Building and Maintaining IELCE-IET Programs*

Although adult education providers have developed various models and approaches for IELCE-IET programs, serious challenges remain for providers attempting to design, build, and manage IET activities under Section 243 funding. These challenges include the inflexibility of the IET requirement, which can limit innovation and program effectiveness; the intense effort and resources required to deliver IET to students; the barriers many providers face in creating productive partnerships with workforce entities to coordinate the training portion of IET; and geographic challenges that hinder programs' success. These challenges, as well as structural considerations, have meant that certain organizations, especially community colleges and school districts, are better able to develop and run IELCE programs, while others, such as CBOs and libraries, are often less equipped to provide services via IELCE funding. Even though IELCE providers are not mandated to enroll all of their participants in IET activities, the requirement that they all offer access to IET has, in effect, forced most IELCE providers to go through the process of creating or arranging IET activities. As a result, these findings provide a glimpse of IELCE's effects on its providers and important lessons for future efforts to tie adult education services for immigrants with the workforce development system.

These challenges ... have meant that certain organizations, especially community colleges and school districts, are better able to develop and run IELCE programs, while others, such as CBOs and libraries, are often less equipped to provide services via IELCE funding.

Partnerships with Workforce Development Providers

IELCE providers that cannot deliver workforce training within their own institutions must turn to partnerships with other organizations, such as American Job Centers, Title I training providers, and employers, to provide the training that IET must include. The adult education providers interviewed for this project as well as states' annual narrative reports to OCTAE described serious challenges related to developing partnerships in IELCE-IET. Most notable were the difficulty of coupling English instruction with appropriate partner organizations and the lack of incentives for training providers and employers to create or adjust programming to accommodate IELCE-IET regulations.

At a basic level, IELCE's extensive regulations and required reporting can deter employers and workforce training entities, especially those not always willing or able to adjust their programs to accommodate the requirements of IET activities. Adult education providers interviewed for this project reported that many Title I or training providers were more interested in referral models or those with front-loaded English instruction, rather than the concurrent, contextualized instruction that well-designed IET activities generally require. Even when collaboration between organizations was possible, one interviewee described the adult education provider as constantly having to be the "compliance monitor" for the strict reporting

requirements of IELCE and WIOA, a task that demanded significant amounts of staff time.³¹ Pennsylvania's 2018 narrative report describes this process in detail:

*Adult education activities were generally in the context of the occupation [for the IET], but the occupational training rarely integrated the adult education content in a focused, transparent way that reinforced development of the relevant skills. In fact, the trainers appeared not to have made any adjustments to the training curriculum for the Section 243 program. Section 243 grantees have learned that they must find trainers that understand the purpose and goals of the IET and are willing to learn from their adult education colleagues on how best to work with this specific population. Also, occupational training with strict requirements, such as Certified Nursing Assistant training, may not be appropriate for an IET due to the training providers' limited ability to adjust the curriculum.*³²

Related to this challenge is that many workforce training organizations, one-stop job centers, and employers did not always have the same level of experience delivering culturally competent services to immigrants, especially compared to adult education providers who routinely teach English and integration topics to diverse communities. Providers reported that immigrant students often struggled in workforce training programs not designed for ELs or provided by staff and organizations accustomed to serving immigrants. Pennsylvania's 2017 narrative report echoes these challenges regarding providers' cultural competence, noting that referrals to Title I-funded job centers for training were often difficult "because many one-stop center staff are inexperienced at working with individuals who do not speak English fluently."³³ Some providers avoided these challenges by developing cotaught IET programs in which English instruction and workforce training were provided in the same classroom or on the same day, but such approaches required training partners to agree to share space and adjust their instructional models.

Strict requirements around eligibility for workforce training also presented significant barriers to programs' ability to develop partnerships for IET activities. In some cases, IELCE providers could use their Section 243 funding to pay for their students' training activities, but this approach diverted resources that could have been used to recruit or serve more students within the program. And although unauthorized immigrants and those with temporary legal statuses are eligible for adult education services, they are not eligible for workforce training, meaning that unauthorized immigrant students and those with temporary statuses were also generally unable to participate in IET activities, even if they were interested. This challenge is detailed in Virginia's 2018 narrative report: "IELCE programs have reported that Title I agencies have deemed many IELCE IET students as ineligible for title I support of the training component of an IET program due to immigration documentation status or household income. This leaves fewer options for supporting related occupational training tuition."³⁴

With regard to funding for IELCE-IET programs, IELCE providers interviewed for this project reported that workforce development entities often lacked meaningful incentives to partner to create IET activities. Since IELCE providers could generally not offer additional funding or even compensation for the extensive planning required to develop IET activities, training providers were generally unwilling to collaborate

31 Authors' interview with former EL/Civics provider, July 27, 2020.

32 Pennsylvania Department of Education, "Pennsylvania Narrative Report 2018-19," NRS, accessed September 17, 2021.

33 Pennsylvania Department of Education, "Pennsylvania Narrative Report 2017-18," NRS, accessed September 17, 2021.

34 Virginia Department of Education, "Virginia Adult Education Narrative Report 2018-2019," NRS, accessed September 17, 2021.

to create IELCE-IET programs solely “out of the kindness of their hearts,” as one interviewee noted.³⁵ One provider also shared that they often struggled with the intensive resources needed for certifications or finding partners who would “play in the sandbox” to create IET programs with them.³⁶ In limited instances, providers reported being able to leverage start-up funds to convince workforce training providers to partner. For example, one adult education provider was able to obtain a grant from a local workforce development board to help the organization identify and develop partnerships to build an IELCE-IET program.³⁷

When IELCE providers did develop successful partnerships with workforce training providers, such arrangements often grew from existing relationships with workforce organizations and employers from previous programs, such as workplace literacy courses or statewide efforts to promote IET. Similarly, the challenges related to partnerships generally fell hardest on CBOs and libraries, which were unable to offer workforce training within their institutions. This contrasted with community colleges and school districts, which could often leverage existing training programs within their different departments or, in the case of school districts, partnerships with technical schools.

Resources Required to Run the IET Component of IELCE Programs

Despite the funding set aside for IELCE Section 243 programming, many providers interviewed for this report described the extensive resources required for designing, building, and maintaining IELCE programs as a serious challenge to developing sustainable programs. As with other challenges surrounding IELCE under Section 243, the increased cost in both funds and staff time was largely associated with the program’s IET requirement. IET activities are more expensive to manage than traditional adult education programs because their workforce components require specialized trainers who are usually compensated at higher rates than adult education instructors, and the provision of support services is often critical for students’ success.³⁸ In addition, the cost of using specialized training facilities and providing or subsidizing equipment for students can greatly outpace the costs of textbooks, nontechnical instructors, and classroom space used in traditional adult education courses, such as English and civics. In addition, providing contextualized, concurrent instruction or coteaching requires IELCE programs to pay for two instructors, increasing the cost per student.

A larger challenge for many providers was the extensive planning and staff time required for the development of an appropriate IELCE program that included contextualized English and civics along with a relevant IET activity that fit with local workforce priorities. According to many IELCE provider interviewees, these efforts were top-heavy and required extensive planning and coordination. Pennsylvania’s 2018 narrative report to OCTAE confirms this challenge, noting that many “grantees underestimated the amount of planning time necessary for both the IELCE and IET activities” and soon discovered that “the adult education teachers and the trainers must meet regularly, ideally several times a week, in an ongoing cycle

35 Authors’ interview with IELCE provider, August 7, 2020.

36 Authors’ interview with former EL/Civics provider, August 14, 2020; authors’ interview with former EL/Civics provider, July 30, 2020.

37 Authors’ interview with IELCE provider, August 4, 2020.

38 Esther Prins and Carol Clymer, “Career Pathways in Chicago, Houston, and Miami: Key Features and Support Services among Education Providers,” *Journal of Research & Practice for Adult Literacy, Secondary & Basic Education* (2018): 28–51; Wachen, Jenkins, and Van Noy, *How I-BEST Works*.

of preparing, reviewing, and revising lesson plans.”³⁹ Further complicating these efforts were often strict curriculum requirements for English and civics courses and extensive mandated reporting associated with the program. In effect, these barriers can mean that organizations use many staff members or staff time to develop IET activities that will not serve many students, given the limited numbers of eligible or interested students. For example, one provider noted that the design of their IELCE-IET program took the combined efforts of 37 people at their institution but served only 12 students in its initial cohorts.⁴⁰

The Impact of Geography and Local Labor Markets

Given that IELCE programs aim to place immigrant students into unsubsidized employment, regional economies can have a considerable impact on both the IET activities offered and the sustainability of programming. As a result, limitations related to geography and local labor markets often contributed to providers’ difficulties in building and maintaining IELCE-IET programs. Although a local economy is a larger structural issue for which IELCE’s purpose or design is not responsible, the fact that every program must maintain a workforce focus and offer access to IET means that any program interested in receiving Section 243 funding must also navigate the realities of their local labor market.

Providers often struggled to find or develop relevant, allowable IET activities that were appropriate for their regions and in demand from enough students to create sustainable cohorts. This challenge was especially serious in areas that lacked many living-wage or specialized jobs, for example, regions with tight labor markets dominated by the tourism or hospitality industry. North Carolina’s

narrative report from 2016 notes this trend: “one of the challenges for some of the [IELCE] programs located in economically depressed, rural areas of the state is identifying in-demand industries that provide family sustaining wages and or are nationally recognized.”⁴¹ IET activities were relatively easy or intuitive to design for IELCE programs in regions with a dominant industry that had continuous demand for workers. For example, a provider in a region with a large textile industry developed an industrial sewing IET that placed immigrant students into high-paying jobs for which workers were almost always in demand (see Box 5 in Section 3.B).

Providers often struggled to find or develop relevant, allowable IET activities that were appropriate for their regions and in demand from enough students to create sustainable cohorts.

The challenges facing IELCE program also greatly depended on whether they were located in a rural or urban area. IELCE programs sometimes struggled to serve rural areas that lacked sufficiently large immigrant populations or training providers and local community colleges to offer IET activities in ways accessible to adult ELs. In urban areas, IELCE programs benefited from a wider range of employment opportunities and larger immigrant populations that could fill a single IET cohort. Yet, some providers in urban areas reported that the requirements and inflexibility of IET activities in their states often made it difficult to recruit students interested in office or administrative jobs. For example, some states examined for this project did not allow a Microsoft Office certification to count as an IET, even though such training was in great demand

39 Pennsylvania Department of Education, “Pennsylvania Narrative Report 2018-19.”

40 Authors’ interview with IELCE provider, July 21, 2020.

41 North Carolina Community College System, “North Carolina 2016 – 2017 Narrative Report,” NRS, accessed September 17, 2021.

among immigrants in many urban areas. One IELCE program provider also noted that it was challenging to tailor programming to their city's diverse job market; the range of employment options made it difficult to gather a group of students interested in the same IET.⁴²

More broadly speaking, many providers struggled to fill cohorts for a single IET if demand for the career corresponding to the workforce training was not sufficiently high. For example, even in areas with large immigrant populations and healthy job markets, providers could struggle to fill and maintain an IELCE-IET program related to welding or manufacturing if not enough students were consistently interested, which could be difficult for providers to know prior to developing such a program. Virginia's 2018 narrative report comments on this challenge: "location seems to play a significant role in the program's success in recruiting applicants. Those in metropolitan areas have access to a larger pool of applicants, where rural programs struggle to find the numbers needed to run a successful program. High demand jobs deemed to be a priority for workforce areas may not be of interest to students."⁴³ Depending on state guidance, some providers, such as Literacy for Life, described in Box 4, were able to develop innovative strategies to meet students' individual interests and needs.

BOX 4

Literacy for Life's EmployED: Individualized Instruction to Support Occupational Training

Located in Williamsburg, VA, Literacy for Life serves nearly 300 students in their IELCE programs. After attempting the more standardized cohort model of IET activities, staff at Literacy for Life quickly pivoted, realizing they could better support students through individual tutoring. Currently, the organization partners with four different postsecondary institutions across the region and supports students who enter workforce training programs at those locations. With the flexibility that individual instruction offers, students have participated in various programs, including CNA, dental assistant, and automotive technician programs. The organization collaborates with instructors at the various institutions, and volunteer tutors receive support through a tutor guide, which supplies tutors with content specific to their occupational training and offers ways to facilitate critical thinking skills, expand on reading strategies, introduce vocabulary practice, and support study strategies. These practices mean that students have more choice in selecting IET that best fits their individual goals and interests, unconstrained by the host organization's capacity to develop a certain number of IET programs.

Source: Authors' interview with Literacy for Life staff, July 31, 2020.

Stymied Innovation

The IELCE providers interviewed for this project had all developed innovative programs leading to quality jobs in in-demand local industries, yet many reported that the maze of inflexible requirements and regulations from both the adult education and workforce development systems in their states hindered this innovation. Beyond mere inconvenience and a drain on providers' resources, this inflexibility, manifesting through myriad state regulations for funding, also blocked the development of new programming or approaches to serving students, a consequence one interviewee described as "stymieing innovation."⁴⁴

42 Authors' interview with former EL/Civics provider, July 9, 2020.

43 Virginia Department of Education, "Virginia Adult Education Narrative Report 2018-2019."

44 Authors' interview with IELCE provider, July 21, 2020.

Several providers described designing and implementing IELCE-IET programs to fit the many regulations of the program as “jumping through hoops.”⁴⁵ Others described IELCE’s IET component as having an “overprescribed nature” due to the extensive regulations handed down by state adult education agencies.⁴⁶ For example, one IELCE provider noted that state regulations required them to teach a traditional civics course on U.S. government and politics to individuals enrolled in a health-care training program—something that was neither of interest nor appropriate to participants with such specific workforce-related goals.⁴⁷ As mentioned earlier, these excessive regulations also made it difficult for IELCE providers to convince workforce training entities or employers that jumping through the hoops was worth the effort. Given that IET also requires many providers to interface with states’ workforce systems, providers often faced an entirely new, additional set of requirements in developing their IET activities.

These excessive regulations also made it difficult for IELCE providers to convince workforce training entities or employers that jumping through the hoops was worth the effort.

As a result, some providers reported that IELCE programs can become “more about compliance and checking boxes” than finding effective ways to serve immigrants seeking to achieve workforce or integration goals.⁴⁸ These regulations not only drained resources and staff time that providers could have devoted to improving programs but also reduced space for innovative approaches that could attract more participants or lead to more robust partnerships. Many IELCE providers also reported that regulations their states imposed on IET were too inflexible or specific to a particular job, compared to their students’ more-fluid demands and the potential creativity within IET approaches. For example, several IELCE providers expressed frustration at regulations that blocked them from helping students develop professional digital literacy or administrative skills through their IET.

Effects on IELCE’s Provider Base

Although IELCE’s initial and ongoing implementation was challenging for most providers interviewed for this project, this difficulty was not evenly distributed among types of providers or states. Challenges with IELCE’s IET component have been greater for CBOs, many of which previously managed EL/Civics programs, compared to community colleges and school districts. Despite facing some challenges in coordinating across departments and recruiting enough students, providing IET activities was often easier for larger providers such as community colleges that could provide workforce training within their own institutions as well as for school districts that had established relationships with technical schools and/or workforce training entities.

Looking at the available data on IELCE from the U.S. Department of Education’s National Reporting System for Adult Education (NRS), displayed in Figure 1, the overall number of IELCE providers has fallen nationwide from 756 in program year (PY) 2016, to 640 in PY 2017, and 598 in PY 2018, before rising slightly to 602 in PY 2019. Declines were especially steep for local education agencies (school districts) and community-based

⁴⁵ Authors’ interview with IELCE provider, July 28, 2020; authors’ interview with IELCE provider, July 31, 2020.

⁴⁶ Authors’ interview with IELCE provider, July 9, 2020.

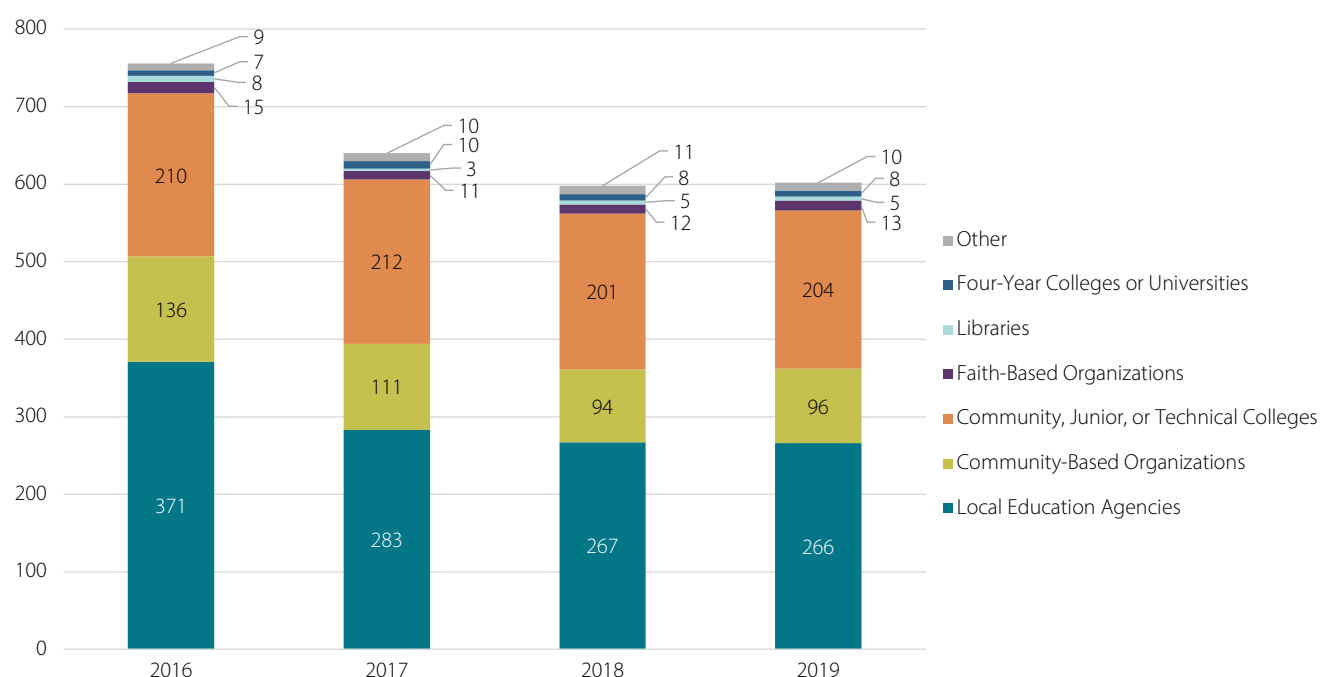
⁴⁷ Authors’ interview with IELCE provider, August 4, 2020.

⁴⁸ Authors’ interview with former EL/Civics provider, July 27, 2020.

organizations. This finding matches the experiences described in interviews conducted for this project. The size of the provider base at community and technical colleges has remained fairly consistent but has increased as an overall share of IELCE providers nationwide. Some states almost exclusively use school districts and community colleges to deliver adult education services, which means that some of these trends may reflect states' systems rather than a changing provider base for IELCE. But equally important, these data do not capture CBOs that had previously delivered EL/Civics and chose not to participate or discontinued IELCE programs due to the difficulties of developing IET activities, as interviewees suggested was common.

FIGURE 1

Number of Integrated English Literacy and Civics Education (IELCE) Providers in the United States, by Type of Institution, Program Years 2016–19



Notes: Program years are from July 1 of the year listed to June 30 of the following year. For example, PY 2018 lasted from July 1, 2018, until June 30, 2019. Provider categories reflect the local grantees categories used by the U.S. Department of Education's National Reporting System for Adult Education (NRS), except for the category "other," which combines NRS provider agency types entitled "other agencies (correctional institutions and non-correctional institutions)" and "other (other #1 – other #3)."

Sources: NRS, "Table 14: Local Grantees by Funding Source, Program Year 2016-2017 Aggregate Table," accessed May 6, 2021; NRS, "Table 14: Local Grantees by Funding Source, Program Year 2017-2018 Aggregate Table," accessed May 6, 2021; NRS, "Table 14: Local Grantees by Funding Source, Program Year 2018-2019 Aggregate Table," accessed May 6, 2021; NRS, "Table 14: Local Grantees by Funding Source, Program Year 2019-2020 Aggregate Table," accessed May 6, 2021.

Specifically, many CBOs struggled to meet the overarching requirements from IELCE Section 243 funding to bridge adult education and workforce development through the use of IET. Representatives of several CBOs that had previously run EL/Civics programs noted in interviews that IELCE's focus on connecting students to workforce training was like fitting a "square peg in a round hole" in their organizations due to the characteristics of their student populations and their relatively limited capacity as small, locally based organizations focused on education.⁴⁹ As one noted, many adult education providers that previously

⁴⁹ Authors' interview with former EL/Civics provider, July 2, 2020.

focused on literacy, civic, and English instruction via EL/Civics and other integration programs have been asked to become workforce development organizations rapidly due to IELCE's IET requirement.⁵⁰ Virginia's narrative report from 2016 reinforces this point: "A significant challenge was the broadening focus of the IELCE programs and providers' mission. Previously, programs had focused on life skills instruction for learners who were often at quite low levels of English proficiency. Skills training and employment placement were not a component of the providers' scope."⁵¹ Given that many CBOs provide ELA courses and formerly provided EL/Civics programs, these organizations generally have well-established connections to immigrant communities and extensive experience delivering culturally competent services to immigrant adults. Consequently, the additional challenges many CBOs appear to face in delivering IELCE-IET represent not only barriers for well-meaning organizations but also the potential loss of trusted, effective partners in providing adult education services that promote immigrant integration.

IELCE providers have faced serious difficulties in building and maintaining their Section 243 programs due to challenges in forming partnerships with workforce training entities, the extensive resources required to run such programs, geographic and labor market conditions, and lack of space for innovation in service design. These challenges can also mean that IELCE-IET programs often favor certain job sectors, geographic areas, and larger institutions such as community colleges and school districts, rather than CBOs. Beyond dealing with the practical challenges of delivering services, IELCE-IET providers have also struggled to recruit student cohorts and create accessible, relevant IET activities, due to larger equity concerns related to IET and its impacts on potential and enrolled participants.

B. Who Is Served by IELCE Programs?

As established by WIOA, IELCE under Section 243 intends to help immigrants and adult ELs learn English, find higher-wage employment, and further their integration.⁵² IELCE programs help some immigrants and adult ELs achieve these goals, including by connecting IELCE-IET participants to new career pathways. At the same time, IELCE-IET programs serve a small number of learners, and IET activities are generally inaccessible to people with low levels of English proficiency and education, creating serious equity concerns for the program. To identify which students IELCE serves, this section examines how many students are served by the program and participate in its IET component, the English and education levels needed to participate in IET, and the time and commitment that many IELCE programs require from students. This section also addresses the impacts of IELCE's exclusion of most immigrant learners without workforce goals as well as immigrant adult learners' interest in and demand for workforce activities.

Enrollment in IELCE-IET

On a national scale, IELCE-IET programming continues to have low enrollment compared to overall IELCE enrollment in Section 243-funded programs. The numbers of students served by IELCE and IELCE-IET have increased since the program was first implemented, but the number of participants enrolled in IELCE's IET activities remains a minority of all those served by the IELCE Section 243-funded program. Aggregate national NRS data, displayed in Table 1, show that roughly 10 percent of IELCE participants were enrolled

⁵⁰ Authors' interview with former EL/Civics provider, July 27, 2020.

⁵¹ Virginia Department of Education, "Virginia Narrative Report 2016-2017," NRS, accessed September 17, 2021.

⁵² WIOA, 1624.

in IET programs in PY 2018 (2018–19), up from 5 percent in PY 2016 and 9 percent in PY 2017.⁵³ This share rose to 12 percent of IELCE participants in Section 243-funded programs in PY 2019 (2019–20); however, these numbers include three months of programming during the COVID-19 pandemic, whose impact on IELCE and IELCE-IET enrollment is unclear. In the states examined for this project, some had higher shares of students participating in IELCE-IET, such as North Carolina, while others, such as Illinois, were below the national average.

TABLE 1

Share of Integrated English Literacy and Civics Education (IELCE)-Integrated English and Training (IET) Participants in Selected States and Nationwide, Program Years 2017–19

State	2017			2018			2019		
	Total IELCE	IET-IELCE	% IET	Total IELCE	IET-IELCE	% IET	Total IELCE	IET-IELCE	% IET
California	97,102	4,730	5%	102,429	6,768	7%	88,767	7,532	8%
Illinois	2,783	39	1%	3,422	24	1%	2,774	n/a	n/a
Maryland	3,775	37	1%	1,407	218	15%	1,459	183	13%
North Carolina	2,454	304	12%	603	125	21%	369	223	60%
Pennsylvania	1,919	24	1%	435	70	16%	421	82	19%
Virginia	2,693	170	6%	2,622	293	11%	3,284	269	8%
Washington	2,930	2,930	100%	2,226	2,226	100%	1,585	1,585	100%
National	160,124	13,978	9%	167,328	16,407	10%	149,281	17,494	12%

Notes: Program years are from July 1 of the year listed to June 30 of the following year. For example, PY 2018 lasted from July 1, 2018, until June 30, 2019. New York State is not included in this table because its program did not start until 2018, two years after the states shown here.

Sources: NRS, “Table 3: Participants by Program Type and Age, Program Year 2017-2018 Aggregate Table,” accessed May 6, 2021; NRS, “Table 3: Participants by Program Type and Age, Program Year 2018-2019 Aggregate Table,” accessed May 6, 2021; NRS, “Table 3: Participants by Program Type and Age, Program Year 2019-2020 Aggregate Table,” accessed May 6, 2021.

On one hand, the relatively low share of IELCE participants enrolled in IET likely reflects the challenges providers face in developing sustainable, scalable IET activities, the access barriers students face, and the lower level of demand for IET (detailed below). On the other hand, these national and state data also speak to the availability of “non-IET” IELCE programming funded under Section 243 of WIOA, which most participants have opted to join. The number of adult ELs receiving English and civics instruction but not workforce training indicates IELCE programs’ success in continuing to offer the type of integration services that help participants learn English and become more effective parents, members of society, and citizens, as they previously did through EL/Civics courses.

To better understand how the IET requirement has affected enrollment numbers, it is useful to examine individual states’ programs, specifically states that require all participants in Section 243-funded programs to enroll in IET activities. Due to these stricter regulations, these states, such as Washington, have removed the confounding effect of providers’ ability to offer some EL/Civics-style instruction in their non-IET cohorts. Examining these states’ programs thus paints a clearer picture of how the transition to an IET-only version

53 NRS, “Table 3: Participants by Program Type and Age, Program Year 2017 Aggregate Table,” accessed May 6, 2021; NRS, “Table 3: Participants by Program Type and Age, Program Year 2017 Aggregate Table,” accessed May 6, 2021; NRS, “Table 3: Participants by Program Type and Age, Program Year 2017 Aggregate Table,” accessed May 6, 2021.

of IELCE affected enrollment. Washington State reported serving approximately 26,000 students in EL/Civics programs in PY 2011 and in PY 2012 and more than 25,000 students in PY 2013.⁵⁴ Yet, under IELCE, the state has served an average of 2,396 students per program year over the four years that IELCE has been in place, representing an extremely large decrease in the number of students served by IELCE relative to the former EL/Civics.⁵⁵ At the same time, enrollment in the state's Section 231 ELA programs has also decreased from 22,480 in PY 2016 to 18,888 in PY 2019. These numbers suggest the displacement of many immigrants seeking integration-focused adult education services and raise concerns around barriers to participation in IET activities for adult ELs and former EL/Civics participants.

Barriers to Participation in IET Activities

Although IELCE providers reported that their IELCE-IET participants did advance their English proficiency and find higher-wage jobs, providers also reported that the significant barriers to accessing workforce training meant that many adult ELs and immigrants could not participate in IET activities. These barriers include the higher level of English proficiency and formal education needed to participate in IET activities as well as the requirement that participants in workforce training have a legal, permanent immigration status. In states where every IELCE participant must enroll in IET, these barriers may mean that many immigrants are unable to access the program at all.

Higher Levels of English Proficiency Required

IET activities, with their focus on both English instruction and workforce development, would seem like a perfect opportunity for immigrant learners to improve their English in ways that will support both their participation in workforce training and their subsequent careers. Yet the workforce training component of IET activities requires advanced English proficiency, which many adult ELs do not possess, and IET activities generally cannot bring students to the requisite level of English proficiency in short periods. Since training programs require specialized vocabulary, advanced fluency, and are often not equipped to serve beginner or intermediate ELs, providers reported that students generally needed a high-intermediate or advanced level of English in order to participate, which excludes many LEP adults. Washington State's 2017–18 and 2018–19 narrative reports both comment on this issue: "challenges include placing students in the earliest levels of ELA onto an occupationally specific career pathway and in connecting those early learning pathways directly to career pathways."⁵⁶ New York State's data on participants' English levels also illustrate the effect of this barrier. New York implemented IELCE in 2018 rather than 2016, due to special circumstances, and since the state requires all IELCE students to participate in IET activities, the characteristics of participants in its IELCE program thus exemplify the level of English needed to participate

54 Washington State Board for Community and Technical Colleges, "Washington State Narrative Report 2011-2012," NRS, accessed September 17, 2021; Washington State Board for Community and Technical Colleges, "Washington State Narrative Report 2012-2013," NRS, accessed September 17, 2021; Washington State Board for Community and Technical Colleges, "Washington State Narrative Report 2013-2014," NRS, accessed September 17, 2021.

55 Calculated from an average of IELCE participation in Washington State using data from NRS, "Table 3: Participants by Program Type and Age, Program Year 2016, Washington," accessed May 6, 2021; NRS, "Table 3: Participants by Program Type and Age, Program Year 2017, Washington," accessed May 6, 2021; NRS, "Table 3: Participants by Program Type and Age, Program Year 2018, Washington," accessed May 6, 2021; NRS, "Table 3: Participants by Program Type and Age, Program Year 2019, Washington," accessed May 6, 2021.

56 Washington State Board for Community and Technical Colleges, "2017-18 Narrative Report: Washington State," NRS, accessed September 17, 2021; Washington State Board for Community and Technical Colleges, "2018-19 Narrative Report: Washington State," NRS, accessed September 17, 2021.

in IET. In the penultimate year of the state's EL/Civics program (fiscal year 2017), more than half (53 percent) of participants had lower levels of English proficiency, as measured by their educational functioning levels. By comparison, in the most recent year of IELCE programming (fiscal year 2020), participants with low levels of English proficiency represented a considerably smaller 31 percent of IELCE participants in the state.⁵⁷

It can take hundreds of hours of instruction for students to advance their fluency in a language, and the instructional time required to advance further increases as an individual's level of proficiency increases (i.e., it takes longer to move from intermediate to advanced levels, compared to moving from beginner to intermediate levels).⁵⁸ Pennsylvania's 2017 narrative report to OCTAE also describes many IELCE providers finding it challenging to provide "an adult education component of the IET that is of sufficient quality and intensity to improve students' academic and communication skills to the level needed to succeed not only in the training but also in any required certification exams and in any resulting employment."⁵⁹ As a result, the likelihood is low that students with low levels of English proficiency could improve their English quickly enough in a short-term program and then join workforce activities. Such learners would likely require either more accessible training activities or more extensive English instruction to be able to participate in many IET activities.

The English level required for participation in IET, however, can also depend on the IET activity and the career for which it prepares participants. Some training activities, especially ones involving more tactile skills such as industrial sewing and culinary work, can be more accessible for ELs with lower English proficiency, since they do not require the same level of fluency or technical vocabulary as training programs for fields such as health care, manufacturing, and information technology. Coteaching courses, which simultaneously delivers English and workforce activities to students, can also make them more accessible to lower-level ELs. Yet, as detailed above, many IELCE providers interviewed noted that partnerships with workforce training providers that would enable this approach are often difficult to develop or unrealistic.

Bridge programming, which states such as Maryland allow, can enable students with lower levels of English to develop the necessary specialized English to participate in IET activities. These programs, which are not defined under WIOA, provide literacy, numeracy, and/or English instruction to prepare participants to enter a workforce training program.⁶⁰ Through such an approach, participants can enroll in an English class to prepare for a specific IET activity and receive instruction in specialized vocabulary and other industry-specific vocational English. Although bridge programming is an innovative, laudable effort by Maryland's Department of Labor, the prerequisites for such courses once again illustrate the challenges those without higher levels of English proficiency face to participate in IELCE-IET: Maryland's IET Bridge classes are intended to prepare learners at a high-intermediate level of English (ESL Level 3) for an IET, a level already fairly advanced and out of reach for many immigrant adult learners who need integration services.

57 Literacy Assistance Center, "Enrollment, FY 2017" provided September 2020; Literacy Assistance Center, "Enrollment, FY 2020" (data set provided to MPI by the Literacy Assistance Center in September 2020). Lower levels of English proficiency defined are as EFL 1 or EFL 2. Under WIOA, the educational functioning levels include six English proficiency levels, ranging from Beginning ESL Literacy (Level 1) to Advanced ESL (Level 6).

58 Ben Knight et al., *How Long Does It Take to Learn a Foreign Language?* (Cambridge, UK: Cambridge University Press, 2018).

59 Pennsylvania Department of Education, "Pennsylvania Narrative Report 2017-18."

60 Judith A. Alamprese and I-Fang Cheng, *Compendium of Innovative Practices: Adult Education Bridge Programs and Integrated Education and Training (IET) Programs* (Bethesda and Rockville, MD: Manhattan Strategy Group and Abt Associates, 2021).

BOX 5**Supporting Students with Diverse Educational Backgrounds: Reading Connections' Industrial Sewing Operator Training**

Located in Guilford County, NC, Reading Connections is a community-based organization that serves students from 20 countries and of various educational backgrounds and English proficiency levels. Their industrial sewing operator training program was developed in partnership with the Montagnard-Dega Association and the Industries of the Blind, and as an IET activity under IELCE Section 243 funding. The six-week program includes three hours of vocational training and three hours of adult education and workforce preparation activities each day, four days per week. Reading Connections staff create the curriculum in collaboration with partners and employers, and partners supply the vocational training and the space and equipment for it.

A refugee resettlement agency based in the county seat, Greensboro, refers most of the program's students. To date, 24 participants have completed the program and secured employment in the local sewing industry, with an additional 23 graduates accepting positions in related or other industries. Individuals with all educational levels and backgrounds, ranging from no formal schooling to postsecondary degrees, have successfully completed the program. The tactile nature of the training, the lower levels of English and literacy needed for employment, and the effective partnership with a local industry all illustrate how an IET can be accessible to immigrants and ELs with diverse educational backgrounds and English proficiency levels.

Sources: Authors' interview with Reading Connections staff, July 16, 2020; author email communication with Reading Connections staff, February 7, 2022.

Education Levels and Professional Experience of IELCE-IET Students

In addition to favoring students with higher levels of English proficiency, entry into IET activities also generally requires advanced education or previous professional experience in a related field. Although not all IELCE-IET programs have education requirements, advanced literacy and numeracy skills, if not a high school diploma, are generally needed to successfully participate in training courses, pass certification exams, and learn independently. IELCE providers interviewed for this project largely described their IELCE-IET participants as being individuals with at

least a high school diploma or equivalent, with some having a college degree or related professional experience in their countries of origin. For example, one IELCE-IET activity designed for a technical job in the health-care field reported serving some individuals with graduate degrees from their countries of origin.⁶¹

Although not all IELCE-IET programs have education requirements, advanced literacy and numeracy skills, if not a high school diploma, are generally needed to successfully participate in training courses, pass certification exams, and learn independently.

To meet reporting requirements and increase IET enrollment, some providers also described directly recruiting students with foreign-earned technical, college, or advanced degrees. In one sense, this approach aligns with one of IELCE's features under Section 243, to include among program participants "professionals

⁶¹ Authors' interview with IELCE provider, July 21, 2020.

with degrees and credentials in their native countries,” and some providers noted that their IELCE-IET programs were helping to combat brain waste or underemployment among highly educated immigrants in their areas.⁶² Although this is a valuable goal, focusing too much on this population risks excluding many immigrants with the most pressing needs for integration assistance, English acquisition, and economic mobility, especially given the existence of other programs to address brain waste.

Legal Status Requirements for Workforce Training

As mentioned, immigrant students' legal status can also create challenges for some students interested in accessing IELCE-IET programs. Even though WIOA Title II programs can serve immigrants who are in the United States without authorization, these immigrants and those with temporary statuses generally cannot use WIOA Title I and other local or state workforce programs. Given that unauthorized and less settled immigrants make up a significant portion of the immigrant population or adult learners in some areas, this regulation can create a complicated dynamic whereby there may be unauthorized or other immigrant students in a non-IET IELCE program who cannot, even if they are interested, participate in the workforce activities offered by IELCE, thus limiting the already shallow pool of students from which providers can recruit for IET activities.

Practicality and Demand for IELCE-IET

As detailed in Boxes 4 and 5, there are some strategies that can make IET activities more accessible to individuals with lower levels of English proficiency and education, as well as strategies to develop pipelines for adult ELs who wish to take a long-term approach to entering workforce training for a specific career path. Yet, many of the common barriers to IET participation are not based on adult learners' characteristics but, rather, on the structural limitations of IET activities that restrict access to them. Providers reported that substantial portions of the immigrant adult learners they serve did not have the time, financial resources, or even interest to participate in the IET activities of IELCE programs.

A primary challenge for many students is that IET activities tend to require significant time commitments. IELCE providers who set up IET activities reported that these programs generally lasted several weeks to months and could demand from 20 to 40 hours per week, depending on the credential. Child-care concerns can also block participation in IELCE-IET programs, as many providers reported that students were unable to juggle family responsibilities with time-consuming courses. Others were reportedly unable to complete IET activities while working full time. Some students find a way to reconcile these conflicting demands on their time, as one IELCE-IET provider described students who worked third-shift jobs and then came directly to daily classes required for the program.⁶³ Although such dedication is admirable, few students can be expected to make such sacrifices to participate in an unpaid, months-long training program. These challenges are also evident in states' narrative reports to OCTAE. Maryland's 2018 narrative report notes that “the number of ESL participants enrolled in the IELCE program continues to outweigh the number of ESL learners participating in the offered IETs. [...] Contributing factors include the following: time class is

⁶² WIOA, 1611.

⁶³ Authors' interview with IELCE provider, August 4, 2020.

scheduled, intensity of course, participant current work schedules, and lack of interest in the occupational cluster.”⁶⁴

A related challenge to participation in IET activities is that many adult ELs were already working and could not forgo wages to participate in an uncompensated training program. Even with the promise of a higher-paying job at the program’s end, many immigrant families did not have the financial resources to lose an income source for such an extended period, especially those living in expensive urban areas. This challenge is more acute for immigrants than native-born adults, as most immigrants (other than naturalized citizens, resettled refugees, and longer-term permanent residents) are not eligible for public-income supports such as Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), or unemployment benefits that support many native-born students while participating in IET activities and workforce training programs.

A lack of interest in participating in workforce training also limits participation in IELCE-IET programs. IET activities focus on a single credential for a specific job or field in which many adult learners may not be interested, narrowing an already limited pool of participants. North Carolina’s 2018 narrative report comments on this trend, stating that “a challenge indicated by several providers was the lack of career pathways that aligned to student interest.”⁶⁵ Similarly, adult ELs who are already employed may be more interested in contextualized English instruction to help them receive a promotion or higher wages at their current job, rather than entering a training program for a new field or occupation. Virginia’s 2018 report illustrates this challenge, noting, “IELCE programs have reported that many students who are eligible to work in the United States are already employed and not interested in earning entry-level credentials in other fields.”⁶⁶

On a broader level, IELCE programming may exclude people who lack workforce goals, particularly in states where every IELCE participant must be enrolled in IET. These adult ELs may include older adults, parents seeking to support their children’s school readiness or ongoing education success, and immigrants who want to increase their civic knowledge and participation in American society, all of whom previous EL/ Civics programming could serve. In states where programs must only offer access to IET, the English and civics components of IELCE programs can still serve these students’ integration goals. Yet, the resources available to run these programs may be limited, depending on the amount of funding needed to support IET activities and providers’ willingness to develop standalone cohorts addressing civic integration not tied to their IET activities.

4 Recommendations and Conclusion

The difficulties many states and providers face in building and maintaining IELCE programs as well as the low enrollment, limited accessibility, and impracticality of IELCE’s IET activities for many immigrants discussed in this report cast doubt on the fundamental soundness of the program’s design and the sustainability of Section 243 IELCE programming as currently conceived. Furthermore, despite some

64 Maryland Department of Labor, “[Maryland Federal Narrative Report 2018-2019](#),” NRS, accessed September 3, 2020.

65 North Carolina Community College System, “[North Carolina 2018 – 2019 Narrative Report](#),” NRS, accessed September 17, 2021.

66 Virginia Department of Education, “[Virginia Adult Education Narrative Report 2018-2019](#).”

successes and innovations at the state and provider levels, ongoing low enrollment in Section 243-funded programs' IET components—activities central to the rationale for creating IELCE—calls into question the broad application of IET to such a significant annual share of WIOA Title II funding. Although IET does help some immigrants concurrently learn English and enter higher-wage employment, its current use and definition under WIOA Section 243 appear to create too great of a burden for adult education providers and systems and to crowd out important efforts to support immigrants' broader economic, civic, and social integration. These challenges thus raise important considerations for the potential reauthorization of WIOA and ongoing efforts to bridge adult education and workforce services via IET.

Although IET does help some immigrants concurrently learn English and enter higher-wage employment, its current use and definition under WIOA Section 243 appear to create too great of a burden for adult education providers and systems and to crowd out important efforts to support immigrants' broader economic, civic, and social integration.

These findings have several implications for the sustainability of IELCE programming, equity concerns about who IET activities serve, and OCTAE's interpretation of the program's IET regulation:

- ▶ **IELCE's IET component can serve participants well by preparing and placing them in high-wage employment, but the barriers to entry, such as the need for advanced English proficiency and income supports, are so high that they exclude many immigrants and adult ELs who most need services, raising equity concerns.** Given the barriers to entry for IET activities, IELCE-IET as currently designed appears best suited for combatting brain waste (i.e., skill underutilization)—that is, helping those with professional certifications or advanced degrees obtain skilled employment—as well as for serving naturalized citizens, permanent residents, and resettled refugees who have the legal status and, for some, the access to income support to participate in training activities. These barriers to participation in IELCE-IET raise equity concerns, as IET activities appear best suited for a small share of relatively well-educated individuals within the immigrant adult learner population. Because most immigrant adults with lower levels of formal education and those with lower-than-intermediate English proficiency generally cannot access IELCE-IET as currently designed, a significant share (if not a majority) of adult immigrants are left out of a key component of the program.
- ▶ **Intentionally designing IELCE-IET programs for accessibility and student interest, along with maintaining opportunities for innovation, can make IELCE-IET more sustainable and relevant for adult ELs.** Examples of innovative practices used by state adult education agencies and IELCE providers observed in this study include:
 - **Focusing IET on activities accessible to participants with lower levels of English and formal education.** For example, workforce training for high-wage but relatively tactile jobs that do not require high levels of specialized English or previous educational attainment can make them accessible to a wider range of participants (see Box 5). If using this approach, however, programs will have to be cautious to evaluate the individual situation and goals of

each student along with their potential to participate in various IET activities, including those that require more advanced English.

- **Developing bridge programming.** Such programs can allow providers to prepare students interested in IET activities by providing specialized preparation that will increase their success in workforce training programs. Providers can also use bridge programs to create pathways and opportunities for participants to earn credentials and qualifications along the way (stackable credentials).
- **Offering individualized instruction for IET.** By providing individualized English and civics tutoring to students who can subsequently enroll in the workforce training activities of their choice, program providers sidestep the need to create a single IET that will attract enough students to be feasible from an operations and funding standpoint. This approach can also empower participants to enroll in the training they feel is most relevant for their situation and goals. For this option to be available, however, state adult education agencies must allow such arrangements within their IELCE programs.
- ▶ **Low IET enrollment in Section 243 programs is likely due to limited interest and demand from adult ELs, high barriers to participation, and providers' difficulties in building and maintaining these programs.** Low enrollment may also partially result from OCTAE's interpretation of Section 243 of WIOA, which made clear that IELCE providers could create "non-IET" IELCE programs, as these programs appear to be significantly more popular than IELCE-IET. Nevertheless, these programs should not affect enrollment in IET activities since all IELCE participants have full access to IET activities. This trend in enrollment along with interview data and state narrative reports suggest that many adult learners are more interested in receiving English (including contextualized English) and civics instruction than workforce training and have voted with their feet for their preferred service. Furthermore, an exclusive focus on employment, skill gain, and wages ignores the reality that most immigrant adults are already employed (64 percent) and that these adults may not be interested in leaving their current jobs to be retrained via IET activities, especially when they would likely have to forgo wages to do so.⁶⁷
- ▶ **IELCE providers' challenges and the relatively low number of students served by IELCE-IET suggest that OCTAE's interpretation of WIOA Section 243's IET requirement saved IELCE from being a largely unworkable program for many states and providers.** Without this interpretation, states and communities would have likely lost most if not all of the programming focused on social and civic integration previously managed under the EL/Civics program. In addition, enrollment in IELCE programs overall would have likely been extraordinarily low relative to the share of WIOA Title II funding mandated to be set aside for the program. Further clarifying the share of participants in Section 243 programs that should be enrolled in IET activities and how providers can utilize the non-IET cohorts of Section 243 programs for more flexible civic and economic integration services could reduce confusion in the field and empower state systems and providers to support immigrant integration outside of IET activities.

67 MPI tabulation of pooled ACS data from 2015–19.

Beyond the IELCE program itself, this study's findings also have implications for both the use of IET generally to assist immigrants and the linking of adult education services for immigrant integration with workforce training:

- ▶ **Although IET has successfully served native-born adults and immigrants with higher levels of English proficiency and formal education, its suitability for immigrant adults more broadly is limited due to its frequent high entry requirements, which the majority of immigrant adult learners are not able to meet.** As noted, IET activities generally require an advanced level of English and high levels of formal education (for example, a high school diploma or equivalent) to participate in workforce training, pass qualifying exams, and enter the workforce, especially for skilled fields such as health care and manufacturing. Yet immigrants are disproportionately likely to have lower levels of formal education (including below a 9th or 5th grade level), and nearly half of LEP immigrant adults report having relatively low levels of English.⁶⁸ Consequently, many immigrants, including those with the most significant adult learning needs, will likely be unable to participate in IET activities unless policies and services are redesigned to open up access for them. Current innovations in the design of IET programs on the local level have the potential to reduce these barriers to entry, but without widespread adoption of such strategies in federal and state regulations and funding streams, these barriers are likely to persist.
- ▶ **Workforce training providers should be equally responsible for providing access to IET for immigrants as adult education providers.** Section 243's efforts to promote integration between the adult education and workforce development systems to serve adult ELs have faced serious challenges, due in no small part to the fact that implementation fell to adult education and not training providers. Without incentives or accountability for accommodating adult ELs, many state workforce systems, local workforce boards, and local training providers have not created workable partnerships with IELCE providers, even though entities that receive WIOA Title I funding are required to provide a "priority of service" for adult learners, including those who are LEP.⁶⁹ Different eligibility rules for students (such as legal status) as well as entry requirements for training also mean that IELCE providers may face a significant mismatch between the adult EL population that comes to them for services and those who are interested, eligible, and qualified for the IET component of IELCE. These challenges underscore the impracticality of Section 243's requirement that adult education providers "place" adult ELs into employment when the workforce development system is both designed and responsible for such tasks. These ongoing challenges suggest that future efforts to bridge adult education and workforce development services for immigrants should more concretely address the participation of Title I workforce training systems, making them equally responsible for IET activities at the local level, rather than placing the burden entirely on local adult education providers.

⁶⁸ MPI tabulation of pooled ACS data from 2015–19.

⁶⁹ Memorandum from John Pallasch, Assistant Secretary, U.S. Department of Labor, *Training and Employment Guidance Letter No. 7020*, November 24, 2020. This memo also makes clear that the Department of Labor intends priority of service populations to make up 75 percent of those served with WIOA Title I adult funding and at a minimum 50.1 percent of those served.

These findings also carry important considerations for the reauthorization of WIOA and the development of future federal programs and efforts intended to promote the civic, economic, and linguistic integration of immigrants. ELA programs aim to address the linguistic integration of immigrants, whereas Section 243 IELCE programs are explicitly meant to address economic integration. Consequently, there is currently no explicit space or funding for programs supporting civic and social integration. These services are available only via Section 231(b) IELCE, which receives no guaranteed funding, and non-IET IELCE programs under Section 243, which are not available in every state and not always geared toward these integration goals. Through reforms to WIOA Title II or the development of new programming, however, the federal government can better support these outcomes.

- ▶ **Provide more flexibility and clarity around Section 243's IET requirement.** OCTAE's guidance that not all IELCE students must enroll in IET but they must have access to it has maintained some space to manage EL/Civics-style programs via Section 243 funding, but Congress, OCTAE, and state adult education agencies could take several steps to ensure that states and providers can maintain and scale this type of programming:
 - **Set clearer standards or expectations for what share of participants should be enrolled in IELCE-IET activities.** OCTAE could establish clearer guidance for the share of Section 243 participants who should be enrolled in IET activities. Given that the current share enrolled is roughly 10 percent, a number close to that figure would be a realistic target for IET enrollment, though any advised share should represent a guideline for IELCE programs rather than a rule. As part of such an effort, OCTAE could also provide expanded technical assistance to state agencies and IELCE providers to both illustrate how providers and states can leverage Section 243 funds to promote civic and economic integration as well as how IET activities can be designed to be more equitable and inclusive.
 - **Provide more flexibility in what qualifies as providing access to IET.** As detailed above, building and maintaining an IET component has been burdensome for many IELCE providers. OCTAE and state adult education agencies could reduce this challenge for providers by expanding the definition of what qualifies as offering access to IET. By explicitly allowing established referral systems managed by navigators, consortia models (whereby one provider in a network offers IET that IELCE participants from other organizations can enroll in), and individualized tutoring or instruction to count as access to IET, OCTAE and state adult education agencies could allow more providers, especially CBOs, to deliver IELCE services built around sustainable, in-demand IET activities.
 - **Codify OCTAE's guidance on the IET regulation in any reauthorization of WIOA.** By adjusting the language of WIOA Section 243 to clarify that IELCE providers must offer only access to IET activities via their programs, Congress can solidify the ability of Section 243 funding to promote civic integration through "non-IET" IELCE and reduce some of the confusion about OCTAE's regulation on IET participation. In addition, such a change would ensure that OCTAE's interpretation of the IET requirement, which has been beneficial to IELCE's functioning and sustainability, would remain more permanently in place.

- ▶ **Develop and implement better measures of immigrant participants' progress toward civic and economic integration.** Although IELCE providers in some states can deliver educational services to promote the civic integration of immigrants via their non-IET Section 243 classes, there are few opportunities under WIOA Title II to measure and incentivize these important outcomes for participants in adult education programs. This gap frustrates the ability of adult education providers and systems to track important metrics for the integration of immigrants such as digital literacy, support of children's education, ability to navigate American society and systems, and access to public benefits and/or health care. In any reauthorization of WIOA and subsequent regulatory processes, Congress and OCTAE should consider how to measure and give providers credit for promoting participants' civic integration, for example, by counting such outcomes as measurable skill gains and/or exempting some or all participants in such programs from WIOA's employment and wage performance measures. Even without a reauthorization of WIOA, OCTAE should engage with adult education providers and systems to explore how to better measure the range of civic and economic integration outcomes for immigrants beyond employment, wage gain, credential achievement, gaining citizenship, or advancing in English proficiency. In order to avoid creating overly prescriptive or inflexible reporting mechanisms and rigid testing regimes, however, such measures should be driven by the needs of local immigrant communities and the capacities of local providers, being measured through set outcomes that providers can easily track.
- ▶ **Consider creating two separate funding streams and/or programs for civic and economic integration programming.** By splitting IELCE into two programs in a future WIOA reauthorization, Congress could reduce the confusion and challenges associated with IELCE as it currently exists. Under this arrangement, one program would focus exclusively on economic integration and include current IELCE-IET programs. These programs would maintain the IET access requirement as currently conceived under Section 243 and support broader economic integration via their non-IET cohorts, which could provide supports such as career navigation, digital skills courses, and bridge programming. A second program could then be dedicated to broader social and civic integration programming, which would address various integration outcomes, including but not limited to supporting children's school readiness and educational success, gaining digital and financial literacy, navigating government services and systems, engaging in civic and community affairs, increasing health and well-being, and preparing for the naturalization process. This funding stream would be rooted in the needs of local immigrant communities and provide flexibility in design and reporting to adult education providers to innovatively meet the diverse integration needs of immigrants and refugees. Such a division, however, would require more in-depth analysis and consideration, including engaging extensively with providers and other stakeholders, to ensure evidence-based dedications of funding to each component program.
- ▶ **To encourage more effective collaboration between workforce development and adult education systems and, thus, better promote immigrants' economic integration via IELCE, Congress and state agencies should more strategically incentivize, promote, and require equal partnerships between workforce and adult education programs serving immigrants and adult ELs via IET activities.** For example, requiring more-stringent enforcement of the priority of service requirement for Title I providers and creating planning grants for entities seeking to develop joint

programs using IET could better facilitate cooperation and create more sustainable opportunities for immigrant participation in workforce training. In addition, stronger requirements for Title I participation, technical assistance, and new funding to fully integrate English, civic, and workforce training via IET could also support the creation of more effective partnerships between adult education and workforce development entities.

Attempts to address the economic, civic, and linguistic integration of immigrants via WIOA Title II funds must recognize that the integration needs of the United States' immigrants are as diverse as the immigrant population itself. As a result, a program such as IELCE, which strongly favors workforce outcomes, could likely never entirely meet immigrants' civic, linguistic, and social integration needs, just as English acquisition courses or citizenship programs cannot fully address their economic integration needs. Instead, better supporting the integration of the country's immigrant population through the adult education and workforce development systems demands an equity-sensitive approach that allows for flexible funding streams that can provide an array of programs that are inclusive of and address immigrant adults' diverse learning and integration needs.

Attempts to address the economic, civic, and linguistic integration of immigrants via WIOA Title II funds must recognize that the integration needs of the United States' immigrants are as diverse as the immigrant population itself.

About the Authors



JACOB HOFSTETTER

 [@_JakeHofstetter](#)

Jacob Hofstetter is an Associate Policy Analyst at the Migration Policy Institute (MPI) National Center on Immigrant Integration Policy, where he conducts research and policy analysis to promote the long-term civic, economic, and linguistic integration of immigrants and refugees, with a focus on adult education and workforce development policy.

Previously, he worked as a Research and Policy Associate at the Massachusetts Appleseed Center for Law and Justice and as a Legal Services Coordinator for Human Rights First in Houston and interned for Refugee Services of Texas. Mr. Hofstetter holds a master's degree in global policy studies with a focus on immigration and refugee policy from the Lyndon B. Johnson School of Public Affairs at the University of Texas, Austin, and a BA in history from Miami University.



ALEXIS CHEREWKA

 [@ACherewka](#)

Alexis Cherewka is a research consultant and former intern at MPI's National Center on Immigrant Integration Policy. She is also a PhD candidate at Pennsylvania State University in lifelong learning and adult education, and comparative and international education. Her research focuses on issues of equity, accountability, and instruction in adult literacy and language education policy.

Ms. Cherewka holds a master's degree in applied linguistics and a TESOL certification from the University of Pittsburgh, and she has taught English for speakers of other languages in higher education and adult education contexts in Burkina Faso, Germany, and the United States.

Acknowledgments

This report was supported by the Carnegie Corporation of New York. The authors are grateful to their Migration Policy Institute (MPI) colleagues Jeanne Batalova for her analysis of the American Community Survey data included in this report and Lauren Shaw and Yoseph Hamid for their expert editing and layout. They also thank Ashleigh Imus for additional editorial support.

MPI is an independent, nonpartisan policy research organization that adheres to the highest standard of rigor and integrity in its work. All analysis, recommendations, and policy ideas advanced by MPI are solely determined by its researchers.

© 2022 Migration Policy Institute.
All Rights Reserved.

Design: Sara Staedicke, MPI
Layout: Liz Heimann
Cover Photo: iStock.com/lisegagne

No part of this publication may be reproduced or transmitted in any form by any means, electronic or mechanical, or included in any information storage and retrieval system, without permission from the Migration Policy Institute. A full-text PDF of this document is available for free download from www.migrationpolicy.org.

Information for reproducing excerpts from this report can be found at www.migrationpolicy.org/about/copyright-policy. Inquiries can also be directed to: communications@migrationpolicy.org.

Suggested citation: Hofstetter, Jacob and Alexis Cherewka. 2022. *The Integrated English Literacy and Civics Education (IELCE) Program: Understanding Its Design and Challenges in Meeting Immigrant Learners' Needs*. Washington, DC: Migration Policy Institute.

The Migration Policy Institute is an independent, nonpartisan think tank that seeks to improve immigration and integration policies through authoritative research and analysis, opportunities for learning and dialogue, and the development of new ideas to address complex policy questions.



www.migrationpolicy.org

1275 K St NW, Suite 800, Washington, DC 20005
202-266-1940

