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Public Comments on NH Combined State Plan PY 2024-2027
Submitted by Sarah Ladd Wheeler, Administrator
NH Department of Education, Bureau of Adult Education

Page #	Section	Comment
General		The Public Comment period from 1/9 – 1/12 is insufficient to provide quality, substantive comments on the State Plan.
5	B. Plan Introduction or Executive Summary	Last sentence is not complete.
5	Economic and Workforce Analysis	Confusing statements “Current long term employment projections... will increase” but the next sentence says “This continued deceleration in employment growth”
6	Emerging Industry Demand	3 rd bullet – “a significant deviation”.. How is this “most of which was regained in the last two years” if the previous projected growth as 11,000 jobs and the current projections are only 3,000 jobs?
8	Table C	The 2032 Employment Estimate and 2022-2032 Change columns do not have consistent formatting (commas in the numbers)
10	Paragraph under Table E	Reference to Table X – should be Table F
12	Table H	Is the first category correct? “Age 16 and over” wouldn’t that include everyone on the table?
12	Paragraph under Table H	This doesn’t make sense. Veterans are identified as one of the largest groups facing barriers in the workforce, but their unemployment rate is low, participation rate is high and both are up from 2020. What indicates that they are facing barriers?
13	Table J	Is the first category correct? “Age 16 and over” wouldn’t that include everyone on the table?
16	Last paragraph	The Department of Education is now referred to as NHED not DOE to differentiate between Education and Department of Energy.
17	Paragraph under bullet	Links to Adult Education services are also provided at the One-Stop Centers.
19	New Hampshire Department of Education (DOE)	Please refer to the Department of Education as NHED. Please remove the word “Basic” from Adult Education. ABE has a specific definition and only covers educational activities below the 9 th grade level. WIOA Title II requires educational activities through the secondary level. Please use the term “Adult Education”.

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19	Bureau of Adult Education	The first sentence is misleading. The Bureau serves 7,000 adults who are improving their educational skills but it does not necessarily lead to a high school credential because many adult learners are English language learners with advanced degrees from other countries.
19	HiSET	Please remove the reference to a specific high school equivalency exam (HiSET). NH offers both the GED and the HiSET and therefore the term that should be used is High School Equivalency (HSE).
19	What's Next	What is the "What's Next" class? This is not a standard class offered in all adult education programs.
19	"Adult Career Pathways Coordinator"	Not all adult education programs have a position titled "Adult Career Pathways Coordinator". All programs have a counselor with similar duties who is responsible for assisting adults with resolving barriers to employment, facilitating referrals to community services including other WIOA partners and supporting transition to postsecondary education, training and/or employment.
19	"refugee" services	Refugee resettlement is only offered by 2 local providers. The Bureau provides service to English language learners – not only refugees. Please replace with "new Americans" or "immigrants and refugees" or "English language learners" (This is the term used in Title II)
22	NH DOE	Please change to NHED.
23	Bullet point	Please change ABE to Adult Education
41	Identification and Dissemination of Best Practices	The information under this bullet does not seem to reflect actions that identify or disseminate best practices. Perhaps the success stories highlighted at SWIB meetings showcasing co-enrollment and inter-agency collaboration could be cited as a "best practice".
46	One Stop Operator Consortium	Please change DOE to NHED
47	Professional Development Team	Please change references from IDG to The Consortium. IDG no longer exists.
47	Core Program Activities	Please replace DOE with NHED
48	NH Department of Education	Please correct Adult Basic... the official name of WIOA Title II is Adult Education & Family Literacy Act (AEFLA)
48	1 st paragraph	Please replace DOE with NHED
53	NH Works One Stop Operation	Please replace DOE with NHED
54	Information sharing...	Adult Education is represented at the regional quarterly meetings.
55	List	Should the IBT's collaborative efforts be listed as #7 on the list?
56	1 st paragraph	Please replace DOE with NHED
56	IDG	What is the Industry Data Group? IDG used to be the Interagency Directors Group which was replaced by the Consortium.
56	1 st paragraph	Adult Education also participates in the PDT.
56	4 th paragraph	Reference to IDG that no longer exists.
57	F. Improving Access to Postsecondary Credentials	Please replace DOE with NHED. Please remove the word "Basic" from Adult Education

Page #	Section	Comment
59	3 rd paragraph	Please replace ABE with either AE or Adult Education Adult Education does not have access to or use PACIA.
59	Continuing paragraph	The IDG has been replaced by the Consortium.
60	1 st bullet list	Please remove (ABE)
60	3 rd paragraph	Please remove the word "Basic" from Adult Education. Please remove ABE and use "AE" or Adult Education instead
62	Chart	Please remove the word "Basic" and replace with Adult Education.
64	Chart	Please remove the word "Basic" and replace with Adult Education.
64	Bullet list	Please replace DOE with NHED
65	State Agency Organization	The Interagency Directors Group has been replaced by the Consortium.
65	Governance Structure	Please change DOE to NHED
66	Chart	Please remove the word "Basic" from Adult Education
67	Chart	Please remove the word "Project" from in front of Second Start, They have not been a "Project" since the 1980's. For clarification, Second Start is responsible for Adult Ed's infrastructure fees because under Title II, the fees must be paid by a local provider. However, the Bureau maintains responsibility for program implementation statewide/local level services.
67	Last paragraph	The IDG no longer exists.
68	1 st paragraph	Christine Brennan is the Deputy Commissioner of the NH Department of Education.
74	Last section	Please replace DOE with NHED
76	Second to last paragraph in section 4	The sentence "Bureau, with their knowledge...." Does not make sense.
78	B. Title II	The NH Department of Education has never used a sole source process for awarding adult education & literacy program funds to local providers. Please consider removal of this sentence.
78	II. Describe	Adult education RFPs are solicited every three years, not four years.
80	1 st paragraph	IDG no longer exists.
80	Privacy Safeguard	Section 444 of GEPA specifically refers to access to educational records and the establishment of appropriate procedures for the accessing those records. Is that sufficiently covered with this response?
86	1 st paragraph	Adult Education should be included as a separate entity, not in parentheses following Vocational Rehabilitation.
87	2 nd paragraph	The NH Work Training Conference has not been held since 2019.
106	Under Item 2	Please replace DOE with NHED
114	Last paragraph	Please replace ABE with AE or Adult Education
117	(1)	Windham is spelled incorrectly.
118	Second to last line	The official title is Adult Education & Family Literacy Act (WIOA Title II)

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119	New Hampshire Department of Education	Please replace DOE with NHED Please remove the word “Basic” from Adult Education
119		NOTE: This is the same text that was used on page 19. The first sentence is misleading. The Bureau serves 7,000 adults who are improving their educational skills but it does not necessarily lead to a high school credential because many adult learners are English language learners with advanced degrees from other countries.
119	ABE	Please remove the word “Basic” from Adult Education
119	3 rd paragraph from the bottom	What is the “What’s Next” class? This is not a standard class offered in all adult education programs.
119	HiSET	Please remove the reference to a specific high school equivalency exam (HiSET). NH offers both the GED and the HiSET and therefore the term that should be used is High School Equivalency (HSE).
119	“Adult Career Pathways Coordinator”	This is a local job title and should be replaced with the term “counselor” which is used in the WIOA competitive process and required by all local providers.
119	“refugee” services	Refugee resettlement is only offered by 2 local providers. The Bureau provides service to English language learners – not only refugees. Please replace with “new Americans” or “immigrants and refugees” or “English language learners” (This is the term used in Title II)
126	Program Specific Alignment	The question listed in this section are from the 2020 AEFLA competition. These are the 2023 questions: <ol style="list-style-type: none"> 1. Please list the adult education and literacy activities that will be offered in this program and describe how those activities will be offered concurrently. 2. According to the State Plan, adult education curricula will be aligned with the College & Career Readiness Standards for Adult Education, please describe how the program will evaluate curriculum to demonstrate this alignment. 3. In the State Plan, State Leadership activities are outlined including a high quality professional development system. Please describe how the program’s staff will participate in State Leadership activities including participation on an adult education committee or advisory group; attendance at state-sponsored professional development activities; membership in regional/national adult education organizations. 4. Please describe how the program will meet the requirement of providing instruction delivered by well-trained instructors. 5. The State Plan requires the Agency to assess the quality of providers, an integral part of this process is for programs to review and analyze data on a regular basis to inform program decisions and improve program performance. Please describe what methods the program will use to identify performance areas that are on target versus those that need improvement and the steps for remediation. 6. The State Plan outlined five goals with strategies to address each goal for 2020-2024. Please describe how the program will contribute to meet one or more of these goals.

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140	Special Rule	Clarification – Eligibility for Adult Education & Literacy Programs in NH prohibits participants who are under the age of 16 or who are enrolled or required to be enrolled in school under NH RSA 193. The NH Bureau of Adult Education does not offer a family literacy activity. The Bureau administers a State Funded program for students who are at least 16 years of age and still enrolled in school.																																			
150	Chart	Printed Neam and Title of Authorized Representative should read Sarah Wheeler																																			
208	Title II	<p>The Bureau of Adult Education can only provide Expected levels of performance. Negotiated levels will be determined in the Spring of 2024.</p> <table border="1"> <thead> <tr> <th><i>Performance Indicators</i></th> <th><i>PY 2024 Expected Level</i></th> <th><i>PY 2024 Negotiated Level</i></th> <th><i>PY 2025 Expected Level</i></th> <th><i>PY 2025 Negotiated Level</i></th> </tr> </thead> <tbody> <tr> <td><i>Employment (Second Quarter After Exit)</i></td> <td>20%</td> <td></td> <td>21%</td> <td></td> </tr> <tr> <td><i>Employment (Fourth Quarter After Exit)</i></td> <td>22%</td> <td></td> <td>23%</td> <td></td> </tr> <tr> <td><i>Median Earnings (Second Quarter After Exit)</i></td> <td>\$6,700.00</td> <td></td> <td>\$6,900.00</td> <td></td> </tr> <tr> <td><i>Credential Attainment Rate</i></td> <td>16.5%</td> <td></td> <td>17.0%</td> <td></td> </tr> <tr> <td><i>Measurable Skill Gains</i></td> <td>30.5%</td> <td></td> <td>31.0%</td> <td></td> </tr> <tr> <td><i>Effectiveness in Serving Employers</i></td> <td><i>Not Applicable</i></td> <td><i>Not Applicable</i></td> <td><i>Not Applicable</i></td> <td><i>Not Applicable</i></td> </tr> </tbody> </table>	<i>Performance Indicators</i>	<i>PY 2024 Expected Level</i>	<i>PY 2024 Negotiated Level</i>	<i>PY 2025 Expected Level</i>	<i>PY 2025 Negotiated Level</i>	<i>Employment (Second Quarter After Exit)</i>	20%		21%		<i>Employment (Fourth Quarter After Exit)</i>	22%		23%		<i>Median Earnings (Second Quarter After Exit)</i>	\$6,700.00		\$6,900.00		<i>Credential Attainment Rate</i>	16.5%		17.0%		<i>Measurable Skill Gains</i>	30.5%		31.0%		<i>Effectiveness in Serving Employers</i>	<i>Not Applicable</i>	<i>Not Applicable</i>	<i>Not Applicable</i>	<i>Not Applicable</i>
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226	Chart	Please remove the word “Basic” from Adult Education.																																			

From: [Deanna Strand](#)
To: [Roth, Lucia](#)
Subject: FW: Comments on the NH Works State plan 2024-2028
Date: Tuesday, January 16, 2024 12:25:51 PM
Attachments: [image001.png](#)

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Message bounced. Trying again.

*Best,
Deanna*



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From: Deanna Strand
Sent: Thursday, January 11, 2024 4:33 PM
To: Lucia.I.Roth@livefreenh.gov
Subject: Comments on the NH Works State plan 2024-2028

Please accept these comments on the NH Works State plan 2024-2028.

II. Strategic Elements

- A. Economic, Workforce, and Workforce Development Activities Analysis
- 2. Workforce Development, Educaon, and Training Activities Analysis

This section (copied below with problematic areas highlighted) includes misleading language and inaccuracies:

"The Bureau of Adult Education provides funding for programs serving 7,000 adults annually who are improving their basic educational skills leading to a high school credential. The

Bureau also administers the statewide HiSET (High School Equivalency Test) which results in approximately 1,800 adults each year receiving their certificate. ABE programs serve as the foundation and basic building blocks of all workforce development services, as the importance of individuals having foundational skills in math and reading continues to grow. This holds particularly true when looking at past entry-level jobs for job-seeker customers and closing the gap with high-demand skills and occupations.

ABE staff participates in workforce agency partner meetings and NH Works counselors work with students on-site in ABE classes, called “What’s Next”, to introduce career inventories, and career pathways, and promote resources available through NH Works. Adult students also work with an Adult Career Pathways Coordinator, present in the classroom, who meets with students to discuss goals, challenges, and recalibrate employment expectations. This coordinator also builds bridges with local community colleges, CTE centers, and certificate programs to further facilitate adult students to continue into post-secondary education after completing ABE coursework. ABE staff also receive referrals from workforce partner agencies for customers who do not have a high school diploma or are basic skills deficient.

The Bureau also provides refugee service programs. With approximately 500 local employers in refugee resettlement areas, ABE staff work closely with employers and develops programs in partnership to provide employees with on-site English literacy training.”

1. There are multiple references “ABE” as an umbrella term for all adult education programs. ABE, or Adult Basic Education, is a type of service offered in adult education centers. This should be replaced with “adult education providers” or “adult learning centers”.
2. The Bureau of Adult Education probably provides funding for 7,000 adults students total statewide, including those earning a high school credential. Other students are in ESL programs, high school diploma programs, integrated education and training programs and others. This number conflicts with the 1,800 receiving a certificate referenced in the next sentence.
3. HiSET-should be “high school equivalency” (HSE). NH offers two different tests that result in an HSE, the HiSET & the GED.
4. What is “What’s Next”? This is not a statewide adult education program.
5. The Adult Career Pathways Coordinator is not a statewide required role, so it is unclear who this person is or what classes they are present in.
6. Adults don’t currently have broad access to CTE centers.
7. The Bureau of Adult Education doesn’t fund refugee service programs. They may fund an ESL or IET program at a refugee resettlement center.
8. Overall, this description doesn’t include the full breadth of the variety of adult education programs available in NH, for example, ESL or adult high school diploma.

Thank you for this opportunity to offer comment.

Best,

Deanna



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[pwd=dFVKTExnOTVTM1B1Q3BCcEtWaXFRUT09](https://nhadulted-org.zoom.us/j/6363455341?pwd=dFVKTExnOTVTM1B1Q3BCcEtWaXFRUT09)

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