New Mexico
Integrated Education and
Training (IET)
Policy

Adult Education Division
New Mexico Higher Education Department
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SECTION I: Context and Core IET Requirements

A. Purpose of Policy

The purpose of this policy is to set forth the requirements and key guidelines for the development and implementation of Integrated Education and Training (IET) programs by New Mexico. This policy guides local Adult Education program providers that are funded by The New Mexico Higher Education Department (NMHED) through Title II of The Workforce Innovation and Opportunity Act (WIOA). This policy exists to ensure compliance with WIOA and with regulations established by the Office of Career and Technical Education (OCTAE) of the U.S. Department of Education. It also shapes IET design and implementation in New Mexico and promotes consistency, high quality, and excellent service to learners and employers. In order to receive approval for the use of NMHED-granted funds, the IET program must demonstrate compliance with this policy or present a detailed and achievable plan to bring an existing IET program into compliance.

B. IET Definition and Core Requirements

WIOA and the final regulations by the U.S. Department of Education define and set forth the requirements for Integrated Education and Training (IET) programs. Section 203 of WIOA defines an IET program 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.*

In this definition, it is important to note that there are three **required** components of an IET program: adult education and literacy activities; workforce preparation activities; and workforce training for a specific occupation or occupational cluster. Presented here are the core requirements of IET programs in New Mexico:

- The three required IET components must be delivered *concurrently*; that is, simultaneously within the overall scope of the IET program, and *not sequentially*.
- The three required IET components must be contextualized, or integrated, with each other within the context of the specific occupation or occupational cluster they prepare learners for.
- Each IET program must use a single set of learning objectives (SSLO) across the three components, to help ensure their full integration.
- The three components of IET programs must also demonstrate appropriate intensity and quality while supporting participants' learning and career preparation. They should be based on the most rigorous research available, particularly with respect to improving reading, writing, mathematics, and English proficiency of eligible individuals.
- In New Mexico, curriculum and instruction must be aligned with the College & Career Readiness Standards (CCRS) or the English Language Proficiency Standards (ELPS).
- Instructional materials used should be occupationally relevant.
- Must have one or more of the New Mexico approved IET outcomes (See Part D of this section below).

C. Overview of the Three Required Components

The three **required** components of an IET program are:
- Adult education and literacy activities;
- Workforce preparation activities;
- Workforce training for a specific occupation or occupational cluster

The following overviews of each component are pulled from 39 CFR Part 463 Subpart D and presented also in OCTAE's [Integrated Education and Training Design Toolkit](#).

What are Adult Education and Literacy Activities?
WIOA defines "adult education and literacy activities" as programs, activities, and services that include: (a) adult education, (b) literacy, (c) workplace adult education and literacy activities, (d) family literacy activities, (e) English language acquisition activities, (f) integrated English literacy and civics education, (g) workforce preparation activities, or (h) integrated education and training. (§463.30)

These eight allowable activities are at the core of the services adult education programs deliver and are foundational to designing and developing the instruction, structure, and supports of the IET program.

What are Workforce Preparation Activities?
The workforce preparation component outlines the skills needed to be successful on the job or in other postsecondary education and training opportunities. As part of an IET program, workforce preparation activities help an individual acquire a combination of essential skills for today's workforce. They are described in WIOA §463.34 as:
- 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, including:
  - Competencies in using resources and information, working with others, understanding systems, and obtaining skills necessary to successfully transition to and complete postsecondary education or training, or employment, and
  - Other employability skills that increase an individual's preparation for the workforce.

What is Workforce Training?
The workforce training component of IET programs incorporates the specific occupational skills learners need to be employed for a specific job or cluster of jobs. Employability skills are a key component of the College and Career Readiness Standards (CCRS) [The Employability Skills Framework](#) presents a unifying set of workforce preparation and employability skills aligned with the CCRS; it is a useful tool for programs developing and implementing IET Programs.

Workforce training may include:
- In-classroom or online occupational skills training
- On-the-job training
- Incumbent worker training
- Programs that combine workplace training with related instruction, like apprenticeship
- Training programs operated by the private sector
- Skill upgrading and retraining
- Entrepreneurial training
- Transitional jobs

- Job readiness training provided in combination with services above
- Customized training conducted by an employer or group of employers with a commitment to employ an individual upon successful completion of the training (e.g., apprenticeship, pre-apprenticeship programs)

D. New Mexico IET Approved Outcomes

In New Mexico, an IET Program must connect completers to a career pathway. The career must be an in-demand occupation in New Mexico and must have the demonstrated potential to pay a living wage. With Propel, NMHED-AE provides information on [connecting adult learners to career pathways](#) in New Mexico. The IET Program must offer one or more of the following outcomes to successful completers:

- The IET Program culminates in an industry-recognized credential (e.g., New Mexico Child Development Certificate) or full preparation and support for the completer to take the state or industry certification examination (e.g., Certified Nursing Assistant certification exam). The credential or certification is the prerequisite for employment in this occupation or occupational cluster. See **Appendix A** for a list of currently-approved industry-recognized credentials. **_OR_**
- The IET Program culminates in two or more stackable credentials that, together, demonstrably prepare the completer to enter an occupation or an occupational cluster (e.g. frontline healthcare fields). Examples of stackable credentials include CPR, First Aid, and Bloodborne Pathogen Certifications. OSHA 10 and Food Handlers Certification are also examples of stackable credentials in other industries. *On their own*, they are not sufficient to allow a completer access to an occupation, but in combination they may be. See **Appendix B** for a list of currently-approved stackable credentials. **_OR_**
- The IET Program demonstrably prepares the completer to enter a registered apprenticeship program with preference. This type of IET Program is called a Pre-Apprenticeship Program and requires an MOU with an *existing* registered apprenticeship program that provides some reasonable guarantee or preference for access to the apprenticeship. In some cases, another industry-recognized or industry-sponsored, *paid* job training, other than registered apprenticeship, may meet this condition.

Please note that the IET Program may need to demonstrate that the credentials and opportunities it provides are *necessary* to access the career pathway and beneficial for the learner. That is, if the adult learner can likely access the job without the training, then asking the learner to take the time to complete the training may be a disservice to them. Contact the NMHED Adult Education Director with questions about what constitutes acceptable IET Program outcomes in New Mexico and with any questions about possibly acceptable credentials that are not currently on the lists in Appendix A and B.

SECTION II: Processes and Expectations

A. Process Requirements for IET Program Approval and Exception

The NMHED Adult Education Director, or their designee, must approve and monitor the compliance and quality of all IET programs in New Mexico. IET Programs must:
- Submit a complete application for approval, demonstrating a design that include all of the required components and features described in Section I of this policy.
- Enter and code all data pertaining to IETs in LACES in a timely manner and as per the instructions

in Section II, Part D below.

- IET programs must receive approval before beginning to serve eligible students with any HED-issued funds.

Exception: IET programs that served students before December 2023 must complete an application for approval. The due date of this application will be determined in consultation with the NMHED Adult Education Director or their designee. These pre-existing IET programs must receive approval, but may continue to serve students while approval is pending, provided they demonstrate a reasonable plan for compliance with the policy and timely progress on that plan.

B. Expectations

- We expect funded adult education program providers to engage in a rigorous and thorough research, needs assessment, design and planning process to ensure the success of the IET program. OCTAE's [IET Design Toolkit](#) describes four phases of IET development:
  - **Phase 1: Research and Assess.** This key phase should include needs assessment and engagement of stakeholders, including learners, instructors, host institutions, training providers, workforce partners and specialists, providers of student support services, and employers.
  - **Phase 2: Design and Plan.** This phase includes team formation, the definition of your IET program, establishment of goals, and decisions about how the IET will be evaluated.
  - **Phase 3: Develop and Implement.** The integrated, standards-aligned IET curriculum, with its single set of learning objectives and occupationally-relevant instructional materials, are developed and implemented in this phase.
  - **Phase 4: Evaluate and Improve.** Implement your evaluation plan and analyze your data to improve the program.

  The [IET Design Toolkit](#) provides many tools and considerations for use in each of these phases. While programs are not required to use every single one of the tools provided, they should engage in these four phases to the extent that their capacity allows in order to ensure the design of a high quality, compliant program that serves student and employer needs.
- We expect AE program providers to actively collaborate with the local workforce development board (LWDB) and One-Stops, as well as relevant employers and/or occupational bodies/boards, in the design and implementation of the IET program, to support the best possible outcomes for adult learners.
- We expect AE program providers to participate in occasional professional learning opportunities, peer sharing, and other collaborations as we strengthen and refine IET program implementation in New Mexico.
- We expect AE program providers to develop and maintain open resource and curriculum sharing within our network, in collaboration with Propel, our statewide professional learning system.

C. Accountability

We expect AE program providers to communicate with the NMHED-Adult Education Division staff about any substantive changes in the IET program that may impact its success or compliance. The NMHED Adult Education Division monitors the quality of IET programs and their continued compliance with this

policy through occasional audits and site visits; desk reviews on data, fiscal, and program management; and requested reports.

D. Data Collection and Reporting

To ensure compliance with state and federal reporting mandates, particularly for the National Reporting System (NRS), all programs must adhere to the following procedures for recording IET students and classes in New Mexico's Adult Education management information system:

1. **Creation of IET Classes in LACES Database**
   - Each IET class is required to have a distinct entry in the LACES database.
   - The class title must incorporate the term "IET" to facilitate state reporting and analysis.
2. **Enrollment of Students**
   - Only students that attained NRS participation status can be served in an IET program.
   - Upon enrollment in an IET, a student's IET status must be documented.
   - Enrollment should be executed within the class section of the system.
   - On the enrollment interface, select either "IETP" or "IETP/Credential" in the IETP field for accurate federal reporting on NRS Table 11.
   - For students aiming for an industry-recognized credential, choose "IETP/Credential" if credential attainment is possible upon class completion or within one year of exiting the program. This selection impacts the outcome 'Attained a Postsecondary Credential while enrolled or within one year of exit' on Table 5.
3. **Recording Class Hours**
   - Document all hours attended by the student in the IET class/classes in the database.
4. **Capturing Outcomes for IET Students**
   - Outcomes for IET students must be recorded in LACES.
   - IET students are eligible for Measurable Skill Gains (MSGs) types 3, 4, or 5, also referred to as IET-specific MSGs, in addition to general MSGs.
   - Proper documentation is <u>mandatory</u> for the substantiation of all IET-specific MSGs.
   - Further details on IET specific MSGs are accessible via the following [NRS resource](#).
5. **Guidelines for Capturing IET-specific MSGs**
   - **MSG Type 3: Secondary or Postsecondary Transcript or Report Card**
     - Applicable exclusively to IET program participants.
     - Requirement: A transcript indicating the participant meets academic progress standards.
     - Full-time participants must complete a minimum of 12 credit hours per semester; part-time participants, a total of 12 credit hours across two consecutive semesters.
     - Recording method: Navigate to the Outcomes tab, open the IETP and Workplace Literacy Measurable Skill Gains panel, and insert a new record with the IETP MSG Type of Secondary Transcript or Report Card.
     - Ensure the upload of the transcript detailing credit hours in the document panel.
   - **MSG Type 4: Progress Towards Milestones**
     - Ideal for workplace literacy programs.
     - Milestones are to be established in conjunction with employers.
     - Requirement: Employer-provided progress reports demonstrating skill development.

- o Recording method: In the Outcomes tab, access the IETP and Workplace Literacy Measurable Skill Gains panel, add a new record with the IETP MSG Type of Progress towards Milestones.
- o Employer documentation should be uploaded to the document panel.
- **MSG Type 5: Passage of an Exam or Progress in Attaining Skills**
  - o Also known as stackable credentials MSGs.
  - o Can be used to capture passing any exam required for attaining an industry-recognized credentials from Appendix A
  - o List of additional exams and certifications that can be used as stackable credentials is included in Appendix B.
  - o Applicable to participants showcasing occupational progress.
  - o Requirement: Passing a relevant exam or showing skill advancement in alignment with industry benchmarks.
  - o Recording method: Within the Outcomes tab, go to the IETP and Workplace Literacy Measurable Skill Gains panel, add a new entry with the IETP MSG Type of Technical/Occupational Skills Exam, including exam details in the Additional Comments field.
  - o Ensure exam documentation is uploaded to the document panel.
6. **Capturing Attainment of Final Training Credential**
   - All industry-recognized credentials are listed in Appendix A.
   - Recording method: Within the Education tab and the Postsecondary Education or Training panel, add a new record with the selection of Training for the Postsecondary Institution Type. Use the enrollment date into IET program as the Enroll Date. Also, include the name of the credential in the Credential Attained field and the Date Earned to be recognized as an outcome on Table 5.

SECTION III: Resources, Partners, and Tools

A. Funding

IET programs are often expensive to implement. Major associated expenses include pay for instructors, curriculum developers, career navigators, tutors, occupational specialists, and other staff or contractors; the price of tuition or training for the workforce training component of the IET; tools, equipment, and other materials. Other potential expenses include program coordination, certification tests, travel to job or training sites, and support services for students.

We expect that AE program providers will seek out potential sources of IET funding in addition to their AEFLA sub-grants, braiding funding sources to maximize the funds' impact. Potential sources of additional funding include:

- TANF IET funds (from NMHED-AE)
- WIOA Title I funds
- Funds and in-kind support available through the community and colleges for job training or career and technical (CTE) education. Consider institutional funding options that can be earmarked for Adult Education for the purposes of IET Programs, such as has been accomplished at Santa Fe Community College. Consider funding that can flow directly to AE for this purpose or funds that can be leveraged from the college budget, such as those

that may help fund instructor positions. Talk to individuals at local colleges who manage short-term credit and grant funds such as Perkins.
- Grants such as WIN, TAACCCT, and others from foundations and other sources

B. Partners

Your partners in IET development and implementation will likely be many and specific to your local context and the occupation or occupational cluster for which students are preparing. Your WIOA Title I-funded workforce partners and One-Stop operators are listed under the Contacts tab at Propelnm.org.

C. Tools for IET Design, Implementation, and Evaluation

OCTAE, NMHED-AE, and other sources provide a number of optional tools for your use in planning, designing, and carrying out the IET. These tools are located on Propelnm.org under the IET & Career Pathways section under the Instruction & Content Areas tab. The best comprehensive source of tools is OCTAE's Integrated Education and Training Design Toolkit, but there are also excellent resources from LINCs, AIR, other organizations, our own New Mexico Adult Education programs, and several other states. Visit the link above for the full menu.

Any adult education practitioner in New Mexico should be familiar with the College and Career Readiness Standards (CCRS); all AE instruction, including instruction IET programs, must be aligned with these standards. Find the CCRS here: College and Career Readiness Standards for Adult Education. The Employability Skills Framework also provides a CCRS-aligned set of skills that cuts across the workforce development and education sectors; use this as you design the required workforce preparation component of your IET Program.

Also on Propelnm.org, you will find the New Mexico Adult Education Career Pathways Maps. These downloadable, easy-to-use maps show in-demand career paths and how our learners might access them.

Finally, Propel lists contact information for NM Adult Education state staff. Please feel free to reach out to discuss your IET ideas and challenges. We are happy to assist and can also put you in touch with subject matter experts.

Appendix A: Accepted Industry-Recognized Credentials in New Mexico IET Programs

Below is a list of industry-recognized credentials that are currently accepted by the New Mexico Higher Education Department, Adult Education Division (NMHED-AE) as outcomes for IET programs. If you do not see an industry-recognized credential that you would like to include in your IET program, contact the [NMHED Adult Education Director](#).

- Automotive Technician Certificate in Automotive Maintenance and Light Repair
- Certified Nursing Assistant Certificate (CNA)
- Child Development State Certificate (CDC)
- Community Health Worker State Certification (CHW)
- Commercial Driver's License (CDL)
- Dental Assisting Certification
- Early Childhood Multicultural Education Certificate (at CNM)
- Emergency Medical Responder (EMR)
- Emergency Medical Services (EMS)
- Emergency Medical Technician (EMT)
- Google IET Support Certificate
- Medical Assistant Certification
- National Center for Construction Education and Research (NCCER) Certifications (Heavy Equipment Operation or Roofing)
- Paramedic
- Phlebotomy Technician Certificate
- Plumbing License
- Welding Certificate (approved by American Welding Society)

Appendix B: Accepted Stackable Credentials in New Mexico IET Programs

Below is a list of stackable credentials that are currently accepted by the New Mexico Higher Education Department, Adult Education Division (NMHED-AE) as outcomes for IET programs. Note that two or more (depending on the occupation) stackable credentials, in combination, demonstrably prepare the completer to enter an occupation or an occupational cluster. If you do not see a stackable credential here that you would like to include in your IET program, contact the NMHED Adult Education Director.

- ACT WorkKeys National Career Readiness Certificate
- Blood-Borne Pathogen Certification
- Certificates of Completion for Community College Programs (e.g. Certificate of Completion in Retail Management)
- Cardio-Pulmonary Resuscitation (CPR) Certification
- Concussion Safety Training
- Digital Literacy Certificate or Badge
- First Aid Certification
- Food Manager Skills Certificate
- Microsoft Office Certification
- Next Gen or Startup Generation Entrepreneurship Certification
  NorthStar Certificate
- OSHA 10
- ServSafe Manager Certification
- Sudden Cardiac Arrest
- WIN Soft Skills Credential