

ATTACHMENT  
Guam Combined State Plan  
Deficiencies

Following is an itemized list of Guam's Combined State Plan sections that the Departments determined were deficient, including a summary of the reason for the deficiency. Guam must submit revisions for these items in its State Plan or describe its action plan for addressing them no later than September 1, 2016, as described in the Departments' decision letter. The Departments will provide technical assistance to assist Guam in making the required revisions to its State Plan. Items below reflect the corresponding requirement in the State Plan ICR.

**VI.a. – Aligning of Content Standards.** Guam's response lacked adequate detail in its description of the process it is using to determine whether its adult education content standards are aligned with its K-12 standards as required by section of WIOA. The Plan did not indicate that the alignment of its adult education 102(b)(2)(D)(ii)(I) content standards will be in place no later than July 1, 2016.

In 2014, Guam researched and begin the arduous task to align Susan Pimentel's "College and Career Readiness Standards for Adult Education" standards and framework that prepares adult learners for success in postsecondary by incorporating English language arts/literacy and mathematics standards into existing adult education curricula. Guam's effort to meet the July 2016 implementation date was not realized primarily because key personnel (program managers) reassigned or no longer employed at the College. Although the College immediately assigned a program manager to the adult education office, the circumstance adversely affected the momentum, knowledge/familiarity with WIOA and the College and Career Readiness Standards for Adult Education, and development of curricula. Today, the Adult Education Office will transmit several curricula for the College's Learning Outcome Committee (LOC) to review and to implement fall 2017. Revised curricula are a culmination of an analysis process lead by content experts. Gaps identified are addressed in the revised curricula to be reviewed by LOC.

**VI.c – Corrections Education and other Education of Institutionalized Individuals.** Guam's response lacked adequate detail in its description of how the grants and contracts awarded with section 225 funds will be competed and will comply with the requirements of Subpart C in title II of WIOA. Guam must clarify which activities it intends to offer with section 225 funds.

Although GCC is both LEA and SEA, it will provide grant funds, for corrections education and education for other institutionalized individuals, by requiring eligible providers to follow the same application process. Eligible providers shall offer programs that include adult education and literacy activities or other activities such as family literacy, special education, as determined by the eligible agency, secondary school credit, integrated education and training, career pathways, concurrent enrollment, peer tutoring, and transition to re-entry initiatives. A Memorandum of Agreement is maintained between GCC and the Guam Department of Corrections. Through GCC's Adult Education Office, Guam will continue to offer adult these activities at the Department of Corrections to individuals likely to leave the institution within five years of participation in the program.

**V1.f – Assessing Quality.** The Plan did not sufficiently describe how Guam will use assessments and evaluations to improve the quality of its local programs. Guam's response lacked adequate detail in its description of how it will assess the quality of its professional development programs designed to improve: (1) instruction in the essential components of reading instruction, (2) instruction related to the specific needs of adult learners, (3) instruction provided by volunteers or paid personnel, and (4) dissemination of information about models and promising practices.

The quality of providers will be assessed through quarterly evaluations focused on providers' ability to attain targeted performance levels. Evaluation of quantitative data (e.g., average attendance hours, educational functioning level gains, and the number of students pre- and post-tested) will be reported and reviewed with providers and instructors. The State Agency Office will also conduct an annual site visit to meet local administrators, to ensure compliance to federal and local policies, and to review quarterly evaluations. Information compiled from the site visit (such as areas of underperformance) will contribute and personalize the technical assistance session which ensures continuous improvement.

GCC's academic and non-academic programs all follow an annual curriculum review cycle. The Committee on College Assessment was established to monitor assessment activities that guide "improvements at the course, program, and institutional levels". The State Agency Office will require a Corrective Action Plan detailing strategies the provider will implement to ensure areas of underperformance are addressed.

Several handbooks were updated (Assessment Handbook, Advisory Committee

Handbook, and the Student Learning Outcomes Handbook) to strengthen and improve curriculum, retention, and program completion. While the Assessment Handbook formalized the College's process, the Advisory Committee Handbook guides committee members – representatives of business, labor, subject-matter experts, faculty, and students – when assessing, reviewing, and improving adult education. The Student Learning Outcome (SLO) Handbook assists in developing measurable SLOs and learning demonstrated at the program and course level.

Finally, an associate dean was identified to provide varied professional development to faculty or instruction provided by volunteers or paid personnel emphasizing on materials and training that incorporates research-based components on fluency, reading comprehension, phonemic awareness. Areas of professional development include teaching methodologies, student assessments, assisting students with disabilities, and common core state standards in order to increase student success. Faculty participating in a professional development session will evaluate the training as it relates to the session's objectives, materials, presentations, trainer and participants' use of new knowledge or skills. Evaluation results will be used to modify and strengthen future sessions.

**III.b.S.B.i – Multi-Year Grants or Contracts.** Guam did not describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the Territory, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness. In addition, Guam did not describe how it will distribute AEFLA program funds within the Territory.

GCC will provide Title II (AEFLA) funds through a competitive application (RFP) process by identifying, assessing, and awarding multi-year grants throughout Guam to eligible providers. As defined, an eligible provider is an organization (e.g., a local education agency; a community-based or faith-based organization; a volunteer literacy organization; an institution of higher education; a public or private nonprofit agency; a library; a public housing authority; a nonprofit institution with the ability to provide adult education and literacy services; a consortium or coalition of agencies, organizations, institutions, libraries, or authorities described; and a partnership between an employer and an entity described) that has demonstrative effectiveness in providing adult education and literacy services.

