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GED, ESL, and Adult Basic Education

Foundational Learning as Work Requirement Infrastructure

A substantial portion of the 18.5 million expansion adults facing work requirements lack the foundational skills that make traditional employment or higher education accessible. Approximately 10% lack high school diplomas or equivalents. Millions more have limited English proficiency that restricts employment options to jobs where language barriers can be accommodated. These foundational gaps aren't just compliance barriers; they're employment barriers that work requirements alone cannot address.

GED preparation, English as a Second Language programs, and adult basic education represent essential infrastructure for enabling work requirement compliance among populations facing the steepest challenges. But these programs often operate with the least institutional infrastructure, the most fragmented delivery systems, and the greatest reliance on volunteer instructors. Building verification capacity in this sector requires understanding its unique characteristics and constraints.

The Foundational Gap Population

Adults without high school credentials face dramatically constrained employment options. Most jobs requiring even entry-level skills specify high school completion as a minimum requirement. Without this credential, expansion adults are limited to positions in agriculture, construction labor, food service, and informal economy work where educational requirements are minimal or unenforced. These jobs often provide insufficient hours, unstable schedules, and wages that keep workers in Medicaid eligibility range indefinitely.

The GED pathway offers a route to expanded opportunity. A high school equivalency credential opens doors to entry-level positions requiring diploma completion, community college enrollment, vocational training programs, and military service. For expansion adults, GED completion represents not just work requirement compliance during the preparation period but enhanced capacity for sustainable compliance through broader employment access afterward.

Limited English proficiency creates parallel constraints. Immigrants and refugees with strong educational backgrounds and professional skills in their origin countries find themselves limited to positions where English fluency isn't required. A former accountant works in a warehouse. A trained nurse provides home care. A skilled mechanic does yard work. ESL programs offer pathways to employment matching actual capabilities, but progress takes time that work requirements may not accommodate.

The intersection of limited education and limited English compounds challenges. Someone lacking both high school credentials and English fluency faces the steepest barriers to traditional employment. Work requirements for this population must either accommodate extended foundational skill development or accept that compliance will occur through informal employment that builds neither skills nor economic mobility. The policy choice has significant implications for whether work requirements function as compliance theater or genuine pathway to self-sufficiency.

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Program Fragmentation

Adult basic education operates through remarkably fragmented infrastructure. Community colleges offer GED preparation and ESL courses. Adult education centers operate as independent entities or within school district structures. Community organizations provide literacy programming. Faith institutions host ESL classes. Libraries offer tutoring and test preparation. Workforce development programs include basic skills components. This fragmentation reflects organic development responding to community needs but creates verification challenges for work requirement compliance.

No single system tracks participation across this fragmented landscape. Someone attending GED classes at a community college, ESL sessions at a church, and literacy tutoring at a library might accumulate significant educational hours across three different providers, none of whom communicate with each other or with Medicaid verification systems. Documenting this distributed activity requires individual initiative to gather verification from multiple sources and submit consolidated documentation.

The *Adult Education and Family Literacy Act* provides federal funding through state adult education agencies, creating some coordination infrastructure. Programs receiving AEFLA funding report participant data to state agencies, which could potentially connect to Medicaid verification systems. But AEFLA-funded programs represent only a portion of adult basic education provision; programs operating outside this funding stream have no common reporting requirements or data systems.

State approaches to this fragmentation vary significantly. Some states operate unified adult education systems with common data platforms and coordinated service delivery. Others delegate entirely to local providers with minimal state-level coordination. Work requirement verification will be dramatically easier in states with unified systems than in states where adult education operates through hundreds of independent providers with no shared infrastructure.

Hour-Counting Complexity

How do GED preparation hours count toward work requirements? The question sounds simple but reveals significant complexity. A student enrolled in structured GED classes at a community college accumulates hours straightforwardly through attendance records. But much GED preparation occurs through self-study, online coursework, practice tests, and tutoring sessions that lack the structure of formal classroom instruction.

Self-paced GED preparation presents particular challenges. Someone working through GED preparation materials independently studies at varying intensity on inconsistent schedules. They might spend twelve hours studying one week and two hours the next. Without structured attendance records, verification depends on self-reporting that may be accurate or inflated, with limited mechanisms for confirmation. States must decide whether to accept self-reported study hours, require structured program enrollment for hour credit, or develop intermediate verification approaches.

ESL programs face similar complexity. Formal classroom instruction generates attendance records comparable to other educational programs. But language learning increasingly occurs

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through apps, online platforms, conversation practice, and informal immersion. Duolingo tracks usage time; does that count as qualifying educational activity? A conversation circle meeting at a library develops language skills; who documents those hours? The boundary between formal education and self-improvement becomes fuzzy in ways that verification systems struggle to accommodate.

States should consider ***program-based rather than hour-based verification*** for foundational education. Enrollment in a recognized GED preparation or ESL program could count as qualifying activity regardless of specific hours, similar to how full-time college enrollment satisfies work requirements without tracking individual study hours. This approach simplifies verification while creating incentives for program enrollment rather than isolated self-study. The tradeoff involves accepting that program enrollment doesn't guarantee active engagement.

The Pathway Function

GED preparation and ESL programs are not ends in themselves but pathways to further education or employment. Someone completing GED requirements doesn't achieve a terminal credential; they achieve access to opportunities requiring high school completion. Someone developing English fluency doesn't reach a defined endpoint; they gain capacity for employment, education, and civic participation that limited English precluded. This pathway function has policy implications for how foundational education counts within work requirement frameworks.

Should GED preparation count at parity with credential programs? Someone enrolled full-time in GED preparation accumulates hours of educational activity but doesn't earn credits toward a degree or certificate. Someone enrolled full-time in a certificate program accumulates similar hours while also progressing toward a marketable credential. Both represent human capital investment, but credential programs provide more direct labor market value.

The equity argument favors parity treatment. Expansion adults lacking high school credentials face barriers others don't; requiring them to pursue credential programs they're not qualified to enter effectively excludes them from educational compliance pathways. Counting foundational education equivalently to higher education recognizes that participants are doing what they can with where they are, building foundations that enable future advancement.

The accountability argument favors differential treatment. GED preparation can continue indefinitely without completion; there's no inherent endpoint forcing transition to employment or credentialed education. Treating foundational education as equivalent to higher education could enable perpetual compliance through low-intensity activity without genuine skill development. Time limits on foundational education credit or requirements for demonstrated progress could address this concern while maintaining access.

Progress Measurement Challenges

If states require demonstrated progress in foundational education, measurement becomes necessary. GED preparation has natural progress markers: passing individual subject tests, achieving benchmark scores on practice tests, completing curriculum modules. ESL programs use standardized assessments like CASAS or TABE to measure language proficiency gains. Adult basic education tracks reading level advancement and numeracy skill development. These measures

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provide objective progress indicators, but incorporating them into work requirement compliance creates additional administrative infrastructure.

Progress-based requirements risk penalizing participants for factors beyond their control. Learning disabilities, cognitive limitations, trauma, and chaotic life circumstances can all slow educational progress. Someone attending GED classes consistently but advancing slowly due to learning differences should not lose healthcare coverage because their progress doesn't match expected timelines. States implementing progress requirements need exemption frameworks for participants whose circumstances impede advancement despite genuine effort.

Cultural and Linguistic Accessibility

ESL programs often serve immigrant communities where engagement with government systems creates anxiety regardless of actual eligibility concerns. Families with mixed immigration status, communities with recent refugee arrivals, and populations that experienced government persecution in origin countries all bring heightened sensitivity to documentation requirements and data sharing. Medicaid verification in these contexts must navigate trust concerns that don't exist for other populations.

The chilling effect on program participation deserves attention. If ESL students fear that attendance records will be shared with immigration authorities or that Medicaid enrollment will trigger public charge determinations, they may avoid both ESL programs and Medicaid coverage. Work requirements intended to promote self-sufficiency could inadvertently drive immigrant populations away from both language learning and healthcare access, achieving the opposite of policy goals.

Cultural competency in verification systems matters. Forms, instructions, and communications in English only exclude populations whose limited English proficiency is precisely why they're enrolled in ESL programs. Translation into threshold languages addresses some barriers, but cultural context matters beyond language. Verification processes designed around assumptions of stable addresses, reliable phone access, and comfort with bureaucratic systems may fail populations for whom these assumptions don't hold.

Community-based ESL programs often maintain trust relationships that formal institutions lack. A church-based ESL program serving a specific immigrant community may be the only educational setting where participants feel safe. These programs should be eligible for credentialing as verification submitters, but their informal structures may not readily accommodate standard verification processes. Flexibility in verification requirements for culturally-embedded programs could maintain access for populations who won't engage with mainstream institutions.

Volunteer Instructor Complications

Many adult basic education programs rely heavily on volunteer instructors. Retired teachers, community members, faith community volunteers, and college students provide tutoring and instruction that programs couldn't afford through paid staff. This volunteer labor enables program operation but creates verification complications when programs must document participant attendance for work requirement compliance.

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Volunteer-staffed programs often lack formal attendance tracking infrastructure. A tutoring session at a library with a volunteer instructor may have no documentation beyond the participants' memories. A conversation circle at a church doesn't generate attendance records. Requiring these programs to implement formal verification systems creates administrative burden that may exceed volunteer capacity, potentially causing programs to discontinue rather than comply.

Program survival matters because alternatives may not exist. In communities where volunteer-staffed programs provide the only accessible adult education, program closure leaves participants without options. The verification burden that causes a church ESL program to discontinue doesn't create incentive for formal programs to expand; it simply eliminates access for the population that program served.

States should develop *simplified verification pathways* for volunteer-staffed programs. Attestation by program coordinators confirming participant engagement, periodic rather than continuous verification, and acceptance of participant self-reporting with coordinator confirmation could enable continued program operation while providing reasonable compliance documentation. The verification standard for volunteer programs need not match requirements for staffed institutions; it needs to provide adequate accountability without destroying program viability.

Digital Literacy as Foundational Skill

Work requirement compliance increasingly requires digital literacy. Verification portals, online submission systems, electronic communication from MCOs and state agencies, and digital job search all assume computer and internet access along with skills to use them effectively. Expansion adults lacking digital literacy face compliance barriers regardless of their work activity because they cannot navigate the systems documenting that activity.

Digital literacy programs address this foundational gap. Libraries, community centers, and adult education programs offer computer basics courses teaching participants to use email, navigate websites, complete online forms, and manage digital documents. These skills enable work requirement compliance while also expanding employment options in an increasingly digital economy.

Should digital literacy training count as qualifying educational activity? The argument for inclusion recognizes that digital skills are prerequisites for both employment and compliance in contemporary contexts. The argument against notes that digital literacy programs typically involve limited hours and don't represent sustained educational engagement comparable to GED preparation or ESL programs. A middle approach might count digital literacy training as qualifying activity for limited duration or in combination with other activities.

Integration of digital literacy with other foundational programs makes pedagogical and practical sense. GED preparation programs incorporating computer-based testing practice build digital skills alongside academic content. ESL programs using language learning apps develop both English proficiency and technology comfort. Workforce development programs including digital literacy components prepare participants for modern employment. This integration creates efficiency while ensuring foundational skill development remains coherent rather than fragmented.

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Building Verification Infrastructure

Adult basic education verification requires infrastructure development addressing the sector's unique characteristics. State adult education agencies should establish standardized verification protocols that AEFLA-funded programs can implement through existing reporting systems. Community-based programs outside AEFLA funding need accessible pathways to credentialing and verification that don't require sophisticated administrative infrastructure.

State-provided verification templates could enable smaller programs to participate. Simple forms documenting participant name, program type, attendance dates, and estimated hours could be completed by program coordinators and submitted through state portals. This approach lowers barriers while maintaining documentation standards. Template standardization also enables data aggregation across programs, potentially revealing patterns about which programs effectively serve work requirement populations.

Technical assistance for adult education providers builds sector capacity. Training on verification requirements, support for implementing attendance tracking systems, and guidance on credentialing processes help programs meet new obligations without being overwhelmed. State investment in technical assistance recognizes that adult education programs serve essential functions for work requirement compliance and deserve support rather than simply burden.

Coordination across adult education, workforce development, and Medicaid systems enables efficient verification. Data sharing agreements allowing adult education attendance to flow automatically to Medicaid verification systems eliminate duplicate documentation burdens. Joint outreach helping Medicaid enrollees identify appropriate adult education programs connects compliance needs with educational opportunities. Integrated case management ensuring participants receive support across systems prevents people from falling through gaps between program silos.

Foundations for Sustainable Compliance

GED, ESL, and adult basic education programs serve expansion adults facing the steepest barriers to work requirement compliance. Without foundational skills, traditional employment remains inaccessible regardless of motivation or effort. These programs provide pathways not just to compliance but to genuine capability development enabling sustainable employment and eventual economic mobility beyond Medicaid eligibility.

The sector's fragmented infrastructure creates verification challenges that policy must address deliberately. Standardized verification approaches, simplified pathways for volunteer-staffed programs, and state investment in coordination infrastructure can enable adult education programs to serve work requirement compliance functions without being overwhelmed by administrative requirements beyond their capacity.

States designing work requirement policies should view foundational education as essential compliance infrastructure. Counting GED preparation, ESL programs, and adult basic education as qualifying activities recognizes that participants are building the foundations that make traditional employment possible. Excluding foundational education would effectively penalize expansion adults for barriers they didn't create while doing nothing to address those barriers. The choice is

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between policies that enable progress from wherever people start or policies that assume starting points everyone doesn't share.

Next in series: Article 10D, "Navigator Training, Volunteer Training, and Job Readiness Programs"

Previous in series: Article 10B, "Vocational Training and Workforce Development"

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