

National Coalition for Literacy

2023 Year in Review

In today's context, adult learning and education cannot only be reactive. It has to be transformed in order to transform society through the knowledges, skills and competences required for citizenship, social justice, employment and sustainability. A new social contract for education must be built on two foundational principles, firstly education as a common good, and secondly, the right to education throughout life.

Cecilia Palm Secretary-General, Folkuniversitetet, Kingdom of Sweden

These words, written as Dr. Palm was serving as General Rapporteur for the seventh International Conference on Adult Education (CONFINTEA VII) in 2022, provide a powerful statement of the perspective that has motivated the National Coalition for Literacy from its founding in 1983 through its 40th anniversary observation in 2023. As an alliance of the leading national and regional organizations dedicated to advancing adult literacy, numeracy, and digital skills throughout the United States, NCL works to identify, track, and address the effects of educational inequity on members of underserved and marginalized communities and to promote adults' access to and successful engagement in education, workforce participation, and community life. Through its advocacy and awareness building activities, NCL serves as an authoritative resource on the need for and value of adult education and ensures that policymakers and legislators make informed decisions about policies, regulations, and funding that will secure NCL's vision of a nation in which all adults are able to fulfill their potential and meet their goals through access to high quality adult education provided by an integrated system.

NCL's approach to advocacy and awareness building recognizes that adult literacy is a pivotal factor in the larger set of conditions that present obstacles to many adults' full

participation as individuals, family members, and contributors to the larger community. For this reason, NCL takes a collaborative stance that connects it with organizations within the field of adult education and across the wider spectrum of agencies that address the needs of underserved populations.

Here are some highlights of NCL's collaborative advocacy and awareness activities in 2023.

National Adult Education and Family Literacy Week

This annual observance in the third week of September each year allows adult education programs, libraries, and regional and national organizations to elevate adult education and family literacy nationwide with policymakers, the media, and the community. NCL's 2023 sponsorship of AEFL Week began with securing resolutions in the Senate and the House that recognized September 17-23 as AEFL Week 2023. NCL also provided advocacy resources to the field through its website; participated in a COABE advocacy podcast with host Jeffrey Abramowitz on September 20; and worked with other members of the ALL IN Coordinating Council to brief staff from over 20 Senators' offices on the pivotal role of adult education in enabling equitable access to societal resources, employment opportunity, and full participation in community life. In 2024, National Adult Education and Family Literacy Week will be observed from September 15 to September 21.

Adult Literacy and Learning Impact Network (ALL IN)

ALL IN is a national collective impact initiative focused on promoting strategies and initiatives that will give all adults the literacy, numeracy, and digital skills required for full access to individual and collective empowerment. As a member of the ALL IN Coordinating Council, during 2023 NCL played a key role in ongoing planning for ALL In's Priority 1: Awareness Campaign.

Since 2022 NCL and COABE have partnered with ALL IN staff to establish the bipartisan **Senate Adult Literacy Caucus** under the leadership of co-chairs Senator Susan Collins (R-ME) and Jack Reed (D-RI). The Caucus was officially launched at a recognition event on February 9, 2023. In September, the Caucus sponsored a briefing for Hill staff at which a panel of adult learners, adult literacy providers, and business representatives spoke about the importance of the federal role in promoting the development of workforce competences and life skills. The briefing was attended by staff from the offices of 22 Senators.

Workforce Innovation and Opportunity Act

Both the House Committee on Education and the Workforce and the Senate Committee on Health, Education, Labor and Pensions (HELP) made progress on WIOA reauthorization in 2023. Throughout the year, NCL provided suggestions to these committees on potential revisions to the text of WIOA Title II (the Adult Education and Family Literacy Act). NCL's input reiterated key points that NCL and its member organizations have made consistently over time regarding ways to increase the effectiveness of the AEFLA legislation:

- Recognize the centrality of adult basic education to the success of workforce training and economic mobility efforts
- Amend deficit-based language that leads to deficit-based programming
- Include digital skills along with literacy and numeracy in the legislation's list of basic skill types
- Reorient adult basic education accountability and outcomes reporting toward a competency-based approach
- Provide support for remote instruction models and the use of technology in adult education

Thanks to the advocacy efforts of NCL and its colleague organizations, each of these recommendations was included in the bipartisan Adult Education WORKS Act (S.3075) that was introduced by Senators Jack Reed (D-RI) and Todd Young (R-IN) in October 2023, and in the parallel legislation (H.R.5987) introduced in the House that same month by Representatives Lucy McBath (D-GA-07), Frank Mrvan (D-IN-01), and Kathy Manning (D-NC-06). The recommendations were also included in the bipartisan WIOA reauthorizing legislation (H.R.6655, A Stronger Workforce for America Act) that was introduced in the House by Chair Virginia Foxx (R-NC-05) and Ranking Member Bobby Scott (D-VA-03) of the House Education and the Workforce Committee in early December. This legislation was referred to both that committee and the House Ways and Means Committee upon its introduction. As of year end it had been reported out by Education and the Workforce, but no action had yet been taken by Ways and Means.

Office of Career, Technical, and Adult Education (OCTAE)

Along with COABE and the National Association of State Directors of Adult Education (NASDAE), NCL participated in a series of invitation-only quarterly information-gathering sessions with Assistant Secretary Amy Loyd and senior OCTAE staff during the year. Each of these interactions allowed NCL and its colleague organizations to

update OCTAE on developments and activities in the field and maintain strong collaborative relationships with our federal partners.

In addition, Dr. Loyd and OCTAE senior staff participated in the spring and fall NCL members meetings. They provided updates on current and planned OCTAE activities and, at the fall meeting, presented an analysis of National Reporting System (NRS) data for program years 2016 through 2021 that showed increased program participant numbers in 2021 (the most recent data available).

Digital Literacy and Resilience

In December 2022, the Education and Training Administration, U.S. Department of Labor, issued a request for information from the field on barriers to and strategies for development of digital literacy and digital resilience in the workforce, with submissions due in February 2023. In its response, NCL observed that "many online resources for developing digital literacy skills require levels of reading proficiency that a substantial percentage of adults from marginalized or underserved communities do not possess," providing supporting examples using readability analysis. NCL also referenced resource materials available through LINCS and the EdTech Center @ World Education, noting that these "begin to address the digital skill development needs of adults who are learning English, [but] they do not overtly speak to the lack of accessible materials for adults with low levels of reading proficiency." NCL recommended that DoLETA support the creation of open-access materials that promote digital skills development by learners at the lowest levels of reading proficiency, as well as teacher professional learning that supports integration of digital skills with foundational skills for all adults in ABE/ESL instructional contexts.

Ability to Benefit (ATB)

In the late spring, the Office of Postsecondary Education (OPE) within the Department of Education issued proposed rules on several aspects of postsecondary education, including Ability to Benefit. Through ATB, Title IV of the Higher Education Act provides a way for adults who are participating in an eligible career pathway program (ECPP) but do not have a high school diploma or recognized equivalent to receive Pell grant funding administered by the Office of Federal Student Aid (FSA). NCL's comments commended OPE for aligning its definition of "career pathway" with the one stipulated in WIOA section 3 and in the Perkins V career and technical education legislation, stating that "alignment of program models across WIOA Title II (AEFLA), Perkins V CTE, and HEA Title IV is fundamental to promoting the development of intentional

adult career pathways." NCL also commented on the proposed new requirements for federal-level approval of ECPPs, including a reference to adult education and literacy activities as described in WIOA. NCL supported the proposed documentation requirements, observing that they would address an ongoing issue in the field: "This direct and documented connection to WIOA Title II (AEFLA) should give FSA the power it needs to shut down programs that do not provide adequate adult education to support adult high school diploma/equivalency completion and therefore do not meet the requirements for comprehensive adult career pathway programs." NCL further encouraged FSA to include in the proposed rule a greater degree of detail regarding the planned process for ECPPs submitted directly to FSA, rather than to the state, for approval.

National Reporting System (NRS)

The Office of Career, Technical, and Adult Education (OCTAE) issued two Information Collection Requests (ICR) related to the NRS in 2023. NCL provided a response to each, working with colleague organizations to develop aligned statements for collective impact.

- Measuring Educational Gain in the National Reporting System for Adult Education (July): This ICR focused narrowly on the data collection aspects of the NRS, that is, the assessments used for measuring and reporting outcomes. NCL's response noted the emphasis that the existing reporting tables place on measurable skill gains (MSG) of types 1 and 2 and noted that reporting for MSG types 3, 4, and 5 was allowed only for integrated education and training (IET) programs. NCL affirmed the importance of measuring and reporting outcomes for MSG types 1 and 2, but maintained that "by limiting the data collected from non-IET programs to two of the five MSG types, and by requiring detailed attention to EFL level gain and attendance hours, the current reporting structure obscures successful models and conceals the achievements that employers find meaningful and that participants recognize as central to their development of in-demand skills that increase their employability."
- Measures and Methods for the National Reporting System for Adult Education (September): This ICR outlined several substantive changes that OCTAE proposed to make to the NRS reporting structure, including the option for states to develop and use options other than pre- and post-testing for educational functioning level placement in programs designed to assess MSG types other than Type 1a. NCL's response affirmed support for the proposed changes, but noted that the reporting

tables would need targeted revision to support them, and also advocated for making all reporting tables consistent in referencing MSG types rather than EFL levels in their titles and column/row labels. NCL attached to its written comments a set of NRS tables with NCL's suggested edits indicated in tracked changes. OCTAE responded positively to the suggestions made by NCL and numerous colleague organizations in the response that it published in late November 2023.

Application for Naturalization (N-400)

In December, NCL responded to an ICR issued by U.S. Citizenship and Immigration Services (USCIS) on proposed changes to Form N-400, Application for Naturalization. The proposed changes shortened the form considerably and improved the logical flow of the sections, and NCL commended USCIS for these. However, NCL also observed that "users of the N-400 and the accompanying instructions need to possess reading skills at the High Intermediate ESL or the Advanced ESL level on the National Reporting System (NRS) table of Educational Functioning Levels for ESL in order to complete the Form N-400 successfully *pro se.* ... For those without resources for assistance with form completion (such as legal aid and translation services), even with the proposed changes the N-400 still presents considerable barriers to completion." NCL recommended that USCIS "seek to align the language level of Form N-400 with the High Beginning or Low Intermediate EFL level for ESL, to the degree that doing so is feasible given the requirements for use of legal terminology (terms of art) on the form." NCL also provided several strategies for carrying out the recommended alignment.

Digital Equity Champions for All Learners

In anticipation of the release of the Digital Equity Competitive Grant Program by the National Telecommunications and Information Administration (NTIA) in mid-2024, NCL participated in a collaborative effort focused on preparing adult education leaders to take advantage of this opportunity. Led by the Education Department's Office of Educational Technology, the group developed a series of two webinars designed and coordinated by World Education, to take place in January-February, followed by a free pre-conference workshop at the 2024 COABE National Conference in March. The Digital Equity grants will fund the implementation of collaborative digital equity projects for the next five years.

Civil and Human Rights

Throughout the year, NCL continued its collaboration with the **Leadership Conference** on Civil and Human Rights as the Hub for adult education, providing perspectives on the ways that limited literacy, numeracy, and digital skills relate to civil and human rights.

- NCL worked with the Conference-led Census Coalition on early planning for the 2025 American Community Survey (ACS) and the 2030 Decennial Census. NCL's input included observations on the roles of reading proficiency and digital access in survey understanding and completion, and stressed the efficacy of working with adult education partners to reach the hard-to-reach populations whose participation levels challenge the Census Bureau at each Census iteration. NCL also signed on to two Census Coalition letters: one advocating full funding for the Census Bureau in fiscal 2024, and the other opposing the Bureau's plan to change the ACS question about disabilities in a way that could dramatically reduce the count of persons with disabilities. In the latter case, NCL drew on its understanding of the roles of dyslexia and other text-processing challenges in limiting adults' reading proficiency.
- NCL signed on to a comment developed by the Leadership Conference in response to an Office of Management and Budget (OMB) request for input on a guidance memorandum that it was developing on Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence. The focus of the memo was that any federal agency acquiring or using Al should first ensure its effectiveness, safety, and trustworthiness for all users; the Leadership Conference comment commended OMB for this focus and the detail that the memo included on management of Al.
- Through the Leadership Conference, NCL connected with NDD United and signed on to its letter to Congressional leaders encouraging Congress to align with the non-defense discretionary (NDD) spending level set in the Fiscal Responsibility Act of 2023 as it moves forward with the appropriations process for fiscal 2024.

In 2024 NCL will continue its active pursuit of opportunities to promote adult education in policy-related matters. Our work will include the following:

- Improve adult education's visibility and messaging as a key influencer to ensure our purpose and contributions to the U.S. education system are understood by policy makers, stakeholders, and the field
- Increase awareness of the role adult education plays in digital equity, inclusive economic recovery, counteracting systemic racism, and social justice
- Promote broadening of the options for accountability in adult education
- Continue to work on organizational sustainability by increasing NCL's membership base and securing external funding for our work

As always, we will conduct national public policy advocacy with Congress and keep our members connected with developments on Capitol Hill. NCL member organizations and individual friends will have opportunities to be involved in the national conversation on public policy through NCL's semi-annual meetings, monthly public policy calls, conference panel discussions, and task groups.

For more information on NCL's purpose and activities, visit our website at www.nationalcoalitionforliteracy.org or email us at ncl@nationalcoalitionforliteracy.org.