



# National Coalition for Literacy

27 December 2023

Ms. Stephanie Valentine  
Strategic Collections and Clearance Governance and Strategy Division  
Office of Planning, Evaluation, and Policy Development  
U.S. Department of Education  
400 Maryland Ave SW, Room 6W203  
Washington, DC 20202-8240

Re: Docket No. ED-2020-SCC-0141, OMB Control No. 1830-0027

Dear Ms. Valentine,

The National Coalition for Literacy (NCL) appreciates the opportunity to provide further comments to the U.S. Department of Education's Office of Career, Technical, and Adult Education (OCTAE) regarding the Information Collection Request (ICR) on Measures and Methods for the National Reporting System for Adult Education (NRS). The comments provided here reflect NCL's review of OCTAE's document *Responses to Public Comments Received During the 60-Day Notice* and the accompanying *NRS Instrument with Highlighted Changes*.

## **1. Kudos**

NCL strongly endorses the following changes that OCTAE outlines in the referenced documents:

- The inclusion of clear references to the different measurable skill gain (MSG) types on Tables 4, 4A, 4B, 4C, and 11, including reference to Educational Functioning Level Gain as MSG Type 1a. This change will encourage broader vision by overtly contextualizing EFL gains within the larger framework of the multiple paths to achievement that participants in adult education and family literacy programs may follow, as envisioned by the WIOA legislation.

- The addition of columns for Non-Binary and No Answer on Tables 1, 2, and 2A. NCL agrees that the additional columns will allow the collected data to more fully represent all participants in adult education and family literacy programs.
- The addition of lines for Alternative ABE Placement and Alternative ESL Placement on Tables 1, 4, 4a, and 4c. The added lines reflect a proposed new option that would permit states to develop and use alternatives to paired standardized testing for participants enrolled in programs that are designed to produce measurable skill gains (MSGs) of types other than Type 1a. The added lines will allow states to report the outcomes of such alternatives in ways that are relevant and appropriate to both program content and participants' learning objectives. [Note that Table 4a has a typo in the line just above the line for "ESL Total." It should read "Alternative ESL Placement," not "Alternative ABE Placement."
  - In connection with this point, NCL strongly supports OCTAE's clarifying note that "the State, at its sole discretion, must assess the impact of exempting participants from NRS pre- and post-testing who are enrolled in programs designed to yield outcomes other than MSG type 1a. ... Moreover, the State, at its sole discretion, may identify the programs that are designed to yield outcomes other than MSG type 1a. ... States may introduce alternative placement methods incrementally and at their own pace, conduct pilot studies, and apply them only to certain programs the State identifies."
- The addition of "Exit-Based" in the titles of Tables 5 and 5A to help clarify the difference between MSGs and exit-based indicators of performance, as well as the consolidation of two lines into one for reporting attainment of a secondary school diploma or recognized equivalent, and the parallel changes made to the related Tables 8, 9, 10, and 11.

## 2. Possible Oversight

NCL also notes a possible omission or oversight in Tables 4 and 4C, columns G and N. The original headers for these four columns read, "Total number of IET or workplace literacy participants who achieved an MSG via transcript, milestones, or exam other than EFL gain and secondary school diploma." The revised headers delete "other than EFL gain and secondary school diploma" and add "(MSG types 3, 4, 5)"— a useful clarification. However, the column heads still limit these columns to reporting on "IET or workplace literacy participants," and the accompanying footnote still specifies that "For participants not enrolled in an IET or workplace literacy program, measurable skill gains are only measured by achievement of an educational functioning level gain (MSG types 1a, 1b, 1c) or documented attainment

of a secondary school diploma or its recognized equivalent (MSG type 2).”

Given the opening of new options for alternative placement for **all** program participants, NCL believes that columns G and N in these two tables should allow for reporting of MSG types 3, 4, and 5 for **all** program participants, not only those in IET and workplace programs. NCL suggests revising the column headers to read “Number who achieved an MSG via transcript, milestones, or exam other than EFL gain and secondary school diploma,” and the footnote should be deleted or substantially revised. Without this change, states will not have a space for reporting alternative placement outcomes on these two tables.

NCL deeply appreciates the careful review of public comments, thoughtful development of narrative responses, and notation of adjustments to the NRS reporting instrument that OCTAE staff members have carried out since the end of the 60-day comment period. NCL looks forward to continuing its productive relationship with OCTAE in support of a robust and effective system of adult education and family literacy.

Cordially,

Deborah Kennedy  
Executive Director