



National Coalition for Literacy

20 July 2023

Juliana Pearson
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Re: Docket No. ED–2023–SCC–0034
Comment Request: Measuring Educational Gain in the National Reporting
System for Adult Education

Dear Ms. Pearson:

The National Coalition for Literacy (NCL) appreciates the opportunity to provide comments to the U.S. Department of Education’s Office of Career, Technical, and Adult Education (OCTAE) regarding Measuring Educational Gain in the National Reporting System for Adult Education (NRS). NCL is an alliance of the leading national and regional organizations dedicated to advancing adult education, family literacy, and English language acquisition in the United States. By serving as an authoritative resource on national adult education issues, NCL increases public awareness of the value of programs that provide education in these areas and promotes effective public policy. NCL envisions a nation in which all adults are able to fulfill their potential and meet their goals through access to high quality adult education and literacy services provided by an integrated and well-developed system. The NRS contributes in key ways to the nation’s ability to achieve that vision and thus is of central concern to NCL.

In responding to the comment request, NCL will address the relationship between the data collected by the NRS and the performance accountability requirements of AEFLA with reference to the environment in which adult education and family literacy programs currently operate and the reasons for which adult learners participate in

them. NCL's overall objective is to offer observations and recommendations that support OCTAE in ensuring that the NRS does the following:

- Allows states and programs to demonstrate that they meet the performance accountability requirements of the Adult Education and Family Literacy Act (AEFLA), Title II of the Workforce Innovation and Opportunity Act (WIOA);
- Allows and encourages states and programs to provide data that presents a full picture of how programs are responding to the WIOA mandate to provide the skills and competencies that employers seek, as well as those that postsecondary education requires;
- Uses data collection and reporting proactively to provide leadership and support for the field by encouraging programs to develop and offer programming that responds to employer needs and postsecondary requirements as these relate to adult learners' goals.

The Supplementary Information provided by OCTAE in conjunction with the comment request indicates interest in comments on five questions: (1) is this collection necessary to the proper functions of the Department; (2) will this information be processed and used in a timely manner; (3) is the estimate of burden accurate; (4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and (5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology. NCL's comments below respond to question 1 (Is this collection necessary to the proper functions of the Department?) and question 4 (How might the Department enhance the quality, utility, and clarity of the information to be collected?).

Point 1. Current collection of educational gain data is necessary but not sufficient for the proper function of the Department

The performance accountability regulations for WIOA mandate the collection of data on participant progress in relation to five types of measurable skill gains (MSGs) (WIOA, 2014):

- *Type 1.* Documented achievement of at least one educational functioning level (EFL) of a participant who is receiving instruction below the postsecondary education level
 - (a) States may compare the participant's initial educational functioning level, as measured by a pre-test, with the participant's educational functioning level, as measured by a post-test;

- (b) States that offer adult high school programs that lead to a secondary school diploma or its recognized equivalent may measure and report educational gain through the awarding of credits or Carnegie units; or
 - (c) States may report an educational functioning level gain for participants who exit a program below the postsecondary level and enroll in postsecondary education and training during the program year. A program below the postsecondary level applies to participants enrolled in a basic education program.
- *Type 2.* Documented attainment of a secondary school diploma or its recognized equivalent
 - *Type 3.* Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit's academic standards
 - *Type 4.* Satisfactory or better progress report towards established milestones, such as completion of on the job training (OJT) or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training
 - *Type 5.* Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams

In the current NRS reporting system, educational gain is reported in terms of MSG Types 1 and 2 (Table 4, columns E and F). Tables 4A and 4B reinforce the emphasis on Type 1 MSGs by requiring data on EFL gain as reflected in post-testing and EFL gain in relation to attendance hours.

This NRS emphasis on reporting educational gain reflects the weight that the WIOA legislation places on the provision of literacy, numeracy, and English language skills development as integral to the law's intent. This emphasis is summarized on page 7 of the Statement of the Managers (HELP Committee, 2014):

In reauthorizing title II ... the bill places an emphasis on ensuring States and local providers offer basic skills, adult education, literacy activities, and English language acquisition concurrently or integrated with occupational skills training to accelerate attainment of secondary school diplomas and postsecondary credentials. ***Making sure these skills are solidly in place for all students is a priority.*** (emphasis added)

NCL recognizes and values the emphasis that the NRS places on reporting educational achievement, as reflected in the structure of Table 4. This emphasis aligns NRS

reporting with the intent of the AEFLA reauthorization, demonstrating how this type of information collection is necessary to the proper functions of the Education Department.

However, the Type 1 and Type 2 MSGs represent the goals and outcomes of only a limited portion of the adults who participate in ABE/ESL instruction. For adults whose objective is to become better equipped to obtain and retain employment in a changing workplace environment, increased competence in reading, writing, mathematics, and English language proficiency is essential but is not the only form of measurable, documentable growth. Despite this, the NRS reporting tables allow reporting of outcomes in relation to MSG Types 3, 4, and 5 only for Integrated Education and Training (IET) programs.

Reporting gains of these three types is highly appropriate for IET programs, which, as defined in both the WIOA legislation and AEFLA regulation, must support adult education and workforce preparation concurrently and contextually with career and technical education. Outcomes of this dual enrollment strategy for adults are not fully represented through reporting of EFL gains and achievement of high school diploma or equivalent (MSG Types 1 and 2) because of the job training, occupational skills development, and postsecondary objectives that participation in an IET program typically entails.

In fact, NCL maintains that the option of collecting data on MSGs of types 3, 4, and 5 is appropriate for **all program types** and is necessary to OCTAE's ability to fulfill its "proper functions" with respect to AEFLA. By limiting the data collected from non-IET programs to two of the five MSG types (Table 4), and by requiring detailed attention to EFL level gain and attendance hours (Tables 4A and 4B), 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. Expanding reporting for workplace literacy through measures such as *progress reports towards established milestones from an employer* (MSG Type 4) or *passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks* (MSG Type 5) would greatly increase the options that adult education providers could use to achieve the outcomes that employers desire. Such expanded reporting would also enable the NRS to fully determine the degree to which programs are achieving positive outcomes for the individuals that they serve.

NCL maintains that the exclusion of a format for reporting outcomes for MSG types 3, 4, and 5 for all programs imposes limitations that stand in direct contradiction to both

the larger mandates of the WIOA legislation and the actual outcomes that current AEFLA programs are able to achieve and document. In addition to gathering data on MSG Types 1 and 2, the NRS needs to provide a way for all AEFLA programs to report outcomes in relation to MSG Types 3, 4, and 5 for other allowable workforce-oriented activities, including workplace literacy, integrated English literacy and civics education (IELCE), and workforce preparation. Doing so will allow the NRS to more fully capture what program participants are achieving and what programs know about their adult learners, enabling OCTAE to carry out its “proper functions” with respect to WIOA.

Point 2. Expand reporting to enhance the quality, utility, and clarity of the information collected

The third note to Table 4 in the NRS reporting tables specifies reporting only the most recent MSG within the reporting period. In particular, for a high school diploma or recognized equivalent to be reported in Table 4 Column F, that achievement must be the most recent MSG for the participant. If the participant achieves any other MSG, such as an EFL gain or an industry-recognized credential within an IET program, after HSE completion, that MSG supersedes the high school equivalency and the HSE cannot be counted in the total in Column F.

This way of reporting high school equivalency outcomes is problematic for three reasons:

- It limits the provider’s ability to see how many HSEs its participants have achieved during the reporting period;
- It presents misleading information to stakeholders outside the NRS who may not have full understanding of how data is reported in the NRS tables;
- It fails to meet the needs of state stakeholders, who use HSE completion rates as a key metric when evaluating the effectiveness of adult education programming.

NCL therefore suggests that OCTAE provide a way for programs to report the outcomes that are of importance to stakeholders such as employers and policy makers more directly. One possibility would be a summary table that lists overall totals for each type of MSG: trade-related benchmarks, employer milestones, secondary/postsecondary credit hours, high school equivalency, EFL increase. The table would list outcome numbers only, rather than outcomes by entering EFL, to keep the focus on results rather than on untenable and irrelevant comparisons. This approach to reporting would enhance the utility of the gathered information by providing it in the form most relevant to major stakeholders.

The National Coalition for Literacy hopes that these comments and suggestions will be helpful as OCTAE seeks to improve the NRS reporting tables. 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

References

HELP Committee of the U.S. Senate. (2014). *Statement of the Managers to Accompany the Workforce Innovation and Opportunity Act.*

<https://www.help.senate.gov/imo/media/doc/WIOA%20Statement%20of%20Managers.pdf>

U.S. Department of Education. (2023, June 21). *Agency Information Collection Activities; Comment Request; Measuring Educational Gain in the National Reporting System for Adult Education.*

<https://www.federalregister.gov/documents/2023/06/21/2023-13157/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-for>

Workforce Innovation and Opportunity Act, 29 USC Ch. 32. (2014).

<https://uscode.house.gov/view.xhtml?path=/prelim@title29/chapter32&edition=prelim>