



National Coalition for Literacy

25 September 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
Comment Request: Measures and Methods for the National Reporting System
for Adult Education

Dear Ms. Valentine,

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 the Information Collection Request (ICR) on Measures and Methods for the National Reporting System for Adult Education (NRS), OMB Control No. 1830-0027. 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.

OCTAE is proposing several substantive revisions to the instructions and reporting forms for the NRS ICR. NCL commends OCTAE for its goals in pursuing these revisions, as stated in the July 26, 2023 memo from Amy Loyd, Assistant Secretary for Career, Technical, and Adult Education: "to begin modernizing the NRS and better capture the achievements made by adult learners and the impact of innovative AEFLA-funded programs." In this document, NCL first addresses the proposed revisions (points 1-5),

then provides an overall perspective on NRS information collection that could result in some revision of the sequence of material in the reporting table document (point 6). Lastly, in point 7, NCL comments on OCTAE's plan to "study the technical feasibility of recognizing incremental growth within an EFL as a measurable skill gain," as described in the July 26 letter from the Assistant Secretary for Career, Technical, and Adult Education.

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) and of the Workforce Innovation and Opportunity Act (WIOA) as a whole;
- Encourages states to provide data that fully illustrates 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, including in particular the foundational language, literacy, and numeracy skills that are essential for workforce skills development and full participation in community life;
- Uses data collection and reporting proactively to provide leadership and support for the field by encouraging the development and provision of innovative programming that responds to employer needs and postsecondary requirements in ways that integrate adult learners' needs and goals.

1. Addition of Columns for Non-Binary and No Answer on Tables 1, 2, and 2A

NCL supports the addition of these columns, which would allow the collected data to more fully represent all participants in adult education and family literacy programs. NCL has received anecdotal evidence from state directors and program administrators, who note that they have had to report lower numbers of participants than they actually have because some participants do not identify as either female or male (the only two options on the existing form) and thus are not counted.

In addition, NCL suggests substituting the word "gender" for "sex" in the headings for Tables 1, 2, and 2A. While the statute mandates collecting data "by race, ethnicity, sex, and age" [Section 116(d)(2)(B) and Section 116(d)(4)(F)], the distinction between sex as biological and gender as socially constructed is well established within the health professions and the social sciences (Nicholson, 1994; World Health Organization,

2012). “Gender” is the more appropriate label for a category that includes female, male, and non-binary.

2. New Option for EFL placement of participants on Tables 1, 4, 4A, and 4C

This new option 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. NCL strongly endorses this proposed change, which would allow for demonstration of outcomes in ways that are much more relevant and appropriate to both program content and participants’ learning objectives. This change reflects observations and suggestions made by NCL and many of its colleague organizations in responses to prior years’ NRS-related information collection activities. NCL commends OCTAE for its responsiveness to the input it has received from the field on this subject.

However, while the version of the reporting tables provided with the ICR materials highlights some aspects of this proposed change, it maintains a primary focus on the educational functioning levels (EFLs, MSG Type 1a). It thus does not allow states to fully represent participation levels and outcomes for all participants as described in the July 26, 2023 letter from the Assistant Secretary for Career, Technical, and Adult Education.

The data included in the current NRS reporting tables is intended to provide detailed information on the ways that adult education and family literacy programs are serving participants. Through their focus on the use of the EFLs and assessment using paired standardized testing, the tables shine a crucial light on MSG Type 1a, supporting programs that rely on EFL outcomes as indicators of readiness for placement in content-focused academic or career-oriented programming. In addition, the detailed data that the tables provide on the number and demographics of participants at each EFL allows AEFLA-funded programs and OCTAE to demonstrate that adult education services are available to and effective for adults at all levels of proficiency, including those with the greatest need.

However, EFL gain is only one of the seven different ways to report participant outcomes under WIOA. In order to capture the nature and results of the use of alternative placement by states that choose to implement it, as well as outcomes by all MSG types as described in the Assistant Secretary’s letter, EFL gain information needs to be labeled clearly as MSG Type 1a and reported as part of the larger context of all MSG types. NCL maintains that the NRS reporting system needs to allow for the pivotal role of the EFLs while maintaining perspective on EFL gain as one part of the overall

WIOA vision that incorporates adult language, literacy, and numeracy as foundational aspects of an adult's overall skills development.

NCL therefore suggests several changes to Tables 1, 4, 4A, 4B, and 4C:

- In Tables 1, 4, 4A, and 4C, a row for “alternative placement” should be added just below the ESL Level 6 row. This will allow states and OCTAE to capture essential information about outcomes related to implementation of the change to the entry/exit testing requirement that OCTAE is proposing.
- In Tables 4, 4A, 4B, and 4C, the descriptor “Educational Functioning Level Gain” should be changed to “Measurable Skill Gain Type 1a,” or co-identified as “Educational Functioning Level Gain (MSG Type 1a).” This will contextualize 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.
- Tables 4 and 4C should include columns for reporting on every MSG type, since these tables are designed for reporting all MSGs by placement level. NCL suggests one column each for MSGs of types 1, 2, and 3, and a combined column for MSG types 4 and 5. Combining types 1a, 1b, and 1c into one column will facilitate comparisons among the five overarching MSG types, while data on the sub-types 1a, 1b, and 1c will still be available through Tables 4A and 4B. While providing separate columns for MSG Types 4 and 5 would be preferable, both of them represent progress toward specific employment-related goals and combining them will help to limit the size of these already-cumbersome tables.

NCL also suggests expanding the instructions for each of these tables to clarify the standing of MSG Type 1a within the larger context of all MSGs. Please see Attachment 1 at the end of this document for detail on NCL's suggested edits to Tables 1, 4, 4A, 4B, and 4C and their associated instructions, and for related suggested edits to Tables 8, 9, 10, and 11 on outcome achievement for family literacy, IELCE, correctional education, and IET programs.

3. Consolidation of Rows on Tables 5 and 5A

NCL supports this consolidation, which would facilitate reporting of outcomes after exit for participants who have attained a secondary school diploma or recognized equivalent. NCL notes that the data to be reported on these tables represents four of the six primary indicators of performance listed in WIOA section 116(b)(2)(A) and 20 CFR 677.155—that is, all of the primary indicators except Measurable Skill Gains and Effectiveness in Serving Employers (Type F). To reduce the potential for confusion, NCL

suggests amending the titles for Table 5 and Table 5A to add “Other Than Measurable Skill Gains” to each.

NCL also notes that Tables 8, 9, 10, and 11 must be revised to align with the change to Table 5. Since these tables collect data on the Primary Indicators of Performance, including Measurable Skill Gains (Primary Indicator of Performance Type E, <https://www.dol.gov/agencies/eta/performance/performance-indicators>), NCL suggests changing the titles of these tables to parallel the title of Table 5. Please see Attachment 1 at the end of this document for suggested edits to these tables.

Finally, NCL suggests that OCTAE consider whether breaking out the Measurable Skill Gains by type on Tables 8, 9, 10, and 11 would provide useful detail on outcomes for each of the program types that these tables represent.

4. Proposals for Uniform Distance Education Reporting Criteria for Tables 4C and 5A

OCTAE’s stated purpose here, in response to comments provided in previous iterations of this ICR and in interactions with stakeholders since then, is to “invite commenters to propose a standard definition of distance education and a uniform set of reporting criteria that could be applied across all States and outlying areas and enhance the usefulness and validity of the existing distance education tables 4C and 5A” (ED-2023-SCC-0141-006_attachment_1, page 4).

NCL thanks OCTAE for its active engagement with the field on this matter and for recognizing the roles that Tables 4C and 5A can play in enabling programs to “describe the landscape of their distance education programs to their state and local oversight bodies” (ED-2023-SCC-0141-006_attachment_1, page 4). The data on distance education that states currently report through these tables uses the definition provided in the March 2021 NRS Technical Assistance Guide for Performance Accountability (<https://nrsweb.org/policy-data/nrs-ta-guide>, page 48):

Distance Education—Formal learning activity where students and instructors are separated by geography, time, or both for the majority of the instructional period. Distance learning materials are delivered through a variety of media, including but not limited to, print, audio recording, videotape, broadcasts, computer software, Web-based programs, and other online technology. Teachers support distance learners through communication by mail, telephone, e-mail, or online technologies and software.

NCL also notes the definition of distance education used by the National Center for Education Statistics (NCES) for its Integrated Postsecondary Education Data System (IPEDS, <https://nces.ed.gov/ipeds/use-the-data/distance-education-in-ipeds>):

Distance education (DE) is education that uses one or more types of technology to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor synchronously or asynchronously. The following types of technology may be used for distance instruction:

- Internet;
- Satellite or wireless communication; and
- Audio and video conferencing

A DE course is a single course in which the instructional content is delivered exclusively via DE. A DE program is a program for which all the required coursework for program completion can be completed entirely via DE courses. Courses and programs are considered DE if **ALL** of their instructional portions can be completed remotely. Non-instructional in-person requirements (e.g., orientation and testing) do not exclude a course or program from being classified as exclusively DE.

This NCES definition may be useful as a starting point for OCTAE's consideration of a definition of and reporting criteria for distance education, because it differentiates between distance education **courses** and distance education **programs** (a distinction that Tables 4C and 5A do not make). In addition, the NCES definition identifies a key parameter for identifying a DE course or program: "ALL instructional portions can be completed remotely." However, this parameter may not be appropriate for adult education and family literacy programs, where the available technology tools and platforms as well as programs' ways of using them are so varied.

In a recent study, the World Education Division of JSI Research and Training Institute Inc. and the National State Directors of Adult Education (NASDAE) surveyed state directors of adult education on how their states define and collect data on distance and digital education (DDE) modes. The survey results showed that, for most states, the overarching definition of distance education aligned with the one quoted above from the NRS Technical Assistance Guide. However, definitions varied more widely by mode (blended, hybrid, HyFlex, live remote instruction), and reporting guidelines were formulated and applied inconsistently both within and across states.

These survey results indicate that a reporting requirement that defines distance education as merely a yes/no proposition will not provide the degree of insight that

could inform programmatic decision-making effectively. If OCTAE wants to gather actionable data on adult learner success and persistence in distance education, it needs to move beyond the use of a broad-brush definition to a more nuanced approach that supports states in selecting, using, and assessing the distance education **modes** that lead to the strongest outcomes for their adult learners.

NCL suggests that OCTAE work with State Directors, researchers such as those involved in the survey project cited above and the Digital Resilience in the American Workforce initiative (DRAW; <https://edtech.worlded.org/digital-resilience-in-the-american-workforce/>), and other stakeholders to develop standardized definitions of the different modes (recognizing that these will change over time) and identify criteria for describing and evaluating distance education, such as platform characteristics, nature of online content (instruction v. practice exercises), and degree and type of teacher feedback (see material from Atlas, <https://atlasabe.org/news/recording-distance-learning-contact-and-proxy-hours/>, for considerations around awarding proxy hours for distance learning activities).

NCL further suggests that OCTAE consider supporting programs and states in tracking learner progress in digital literacy. Models for this are available from CASAS (the COAPP assessments) and Northstar Digital Literacy. Another option could be assessments of skills in using career-specific or task-specific digital tools, reported as MSG Type 4 or Type 5, for adult learners enrolled in all types of programming, not only IET.

Implementing these changes would require fairly extensive modification to Tables 4C and 5A, to allow for reporting on different distance education modes, number or percentage of proxy hours, and related information. However, it would encourage states to capture the data they need to more fully describe and understand the role of distance education in their overall state adult education and family literacy systems.

5. Revision of Instructions for Narrative Report and State Assessment Policy

The proposed revisions to the instructions for the narrative report begin with the addition of an introductory overview of the state's AEFLA program. NCL supports this addition, which provides needed context for the subsequent reporting on specific aspects of the state's use of AEFLA funds. NCL also supports the other proposed revisions to the narrative report instructions, which reflect changes to the adult education environment and updated guidance that OCTAE has provided since the instructions were last revised.

NCL suggests that the first sentence of Point 3, Performance Data Analysis, be augmented as follows:

Based on the State data submitted to the National Reporting System (NRS) for this reporting period, describe the State's progress toward meeting its negotiated levels of performance **for all measurable skill gains types**.

The addition of "for all measurable skill gains types" is intended to encourage states to recognize the position of MSG Type 1a within the larger context of the overall WIOA and to consider the system as a whole.

NCL further suggests that the outline for the narrative report should include instructions on describing outcomes related to implementation of alternative assessment. Possible language:

Describe the State's successes and challenges with implementing State-adopted alternative assessment measures for entry placement and for outcomes assessment, including how the State monitors the implementation of the alternative measures in local programs.

The opportunity to conduct assessment other than paired standardized testing means that the instructions for the State Assessment Policy should also be expanded to provide guidance on how states should

- Describe their plans for a policy on the use of alternative assessment measures (that is, placement and outcomes measures other than paired testing)
- Detail their policies for documenting outcomes for all MSG types

These additions will reiterate the emphasis on the measurable skill gains context as a whole, while providing a pathway to an expanded perspective for states that currently focus only on MSG Type 1a.

6. Revising the Reporting Table Sequence

Currently the NRS Reporting Tables begin with Tables 1 through 11, which primarily gather state-specific numbers on participant demographics, participant skills and outcomes, and participants by program type. Next comes Table 99, the indicator denominators, and material on data quality. Finally, the sequence ends with the Narrative Report, the State Assessment Policy, and the financial reporting material.

NCL sees two major issues with this sequencing, and suggests a re-sequencing solution for each.

First, the detailed data is presented before any information on the context it represents has been provided or considered. Data cannot be understood or used meaningfully without reference to the source situation that it represents. In the case of the NRS data, all of the information in Tables 1 through 14 is descriptive of the overall AEFLA program in the state. NCL believes that both report providers and report readers would benefit from having the Narrative Report and the State Assessment Policy positioned at the beginning of the document. In this way, the data tables would serve and support the programmatic description, rather than vice versa.

Second, WIOA requires states to complete the State Performance Report for all WIOA activities. In the case of Title II (AEFLA), states must provide the information that is used to complete Table 99, Indicator Denominators. All of the other NRS tables gather essential information that assures states and OCTAE of the outcomes and effectiveness of AEFLA programs. However, only Table 99 is actually mandated by the WIOA legislation. Table 99 is the part of the NRS reporting tables that connects AEFLA to the larger WIOA context, and it provides the denominators that allow for percentage calculations in the rest of the tables. NCL therefore suggests that Table 99 be positioned near the beginning of the NRS reporting document, just behind the Narrative Report and the State Assessment Policy, as part of the descriptive material for the state's AEFLA program as a whole.

If NCL's suggestions are adopted, the overall sequence of materials will be as follows:

- Narrative Report
- State Assessment Policy
- Table 99
- Tables 1 through 14
- State Data Quality Checklist
- Data Quality Improvement Plan
- Data Quality Checklist Certification
- Financial Reports

Obviously, even if OCTAE adopts this suggestion, states will still be able to complete the tables and other materials in any order they prefer. However, positioning the summary materials at the beginning will frame data collection as supporting the ongoing provision of adult education and family literacy services in the state.

7. Incremental Growth Within an EFL as a Measurable Skill Gain

The July 26 letter from the Assistant Secretary for Career, Technical, and Adult Education refers to OCTAE's intention to explore "the technical feasibility of recognizing incremental growth within an EFL as a measurable skill gain." This is an important initiative that responds to a longstanding need in the field, and NCL commends OCTAE for taking it up.

Each of the Educational Functioning Levels in Adult Basic Education (Literacy/English Language Arts and Mathematics) and English as a Second Language represents a wide range of functional proficiency. This has two important implications:

- Learning is a highly individualized process and each level represents a variety of skills and abilities, so different adult learners who test at the same level may present in highly divergent ways
- Learning progress depends on a variety of factors and the development of proficiency at each level takes time and effort, so different adult learners will move from one level to the next at different rates

These considerations explain why achieving higher scores or ratings on the OCTAE-approved standardized tests can take a long time. They also explain why standardized testing in its current form can be so discouraging and demotivating for both learners and teachers, and why the identification of intermediate steps within each EFL could be so helpful.

However, NCL believes that attempting to create sub-tests within each of the existing standardized assessment structures would be counterproductive, if not impossible. Such sub-tests would only extend the imposition of external evaluation on adult learners, without assuring the provision of a method of assessment that is valid, reliable, and fair.

NCL suggests instead taking a competency-based approach that allows for learner input and choice. This would involve developing a series of tasks at each level (oral and reading/writing tasks for Literacy/ELA, math-related tasks for Mathematics) based on the skills that learners themselves need to do in the workplace and in daily life, with a rubric for evaluation of performance by a trained rater. The tasks would need to be aligned with the content of the existing standardized assessments, but learners would contribute to their identification and development. Learners would then complete similar tasks for practice in class, and choose the tasks on which they want to be assessed based on their learning goals and the competencies they want to develop.

This approach would allow for progress within an EFL to be marked by successful completion of assessed tasks over time. One major advantage of this approach would be that it would provide a way to capture incremental progress by adult learners at the Beginning Literacy, Beginning Basic, Beginning ESL Literacy, and Low Beginning ESL levels, where the slow pace of progress as reflected on standardized tests can be so discouraging and the need for data on effective teaching practices and learning strategies is so great.

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

World Health Organization Genomic Resource Center. *Gender and genetics*.
<https://web.archive.org/web/20121111125721/http://www.who.int/genomics/gender/en/>

Nicholson, Linda. Interpreting *gender*. *Signs* **20**, 79–105 (1994).
<https://www.journals.uchicago.edu/doi/10.1086/494955>

Docket No. ED-2020-SCC-0141

Comment Request: Measures and Methods for the National Reporting System for Adult Education

National Coalition for Literacy

September 25, 2023

Attachment 1

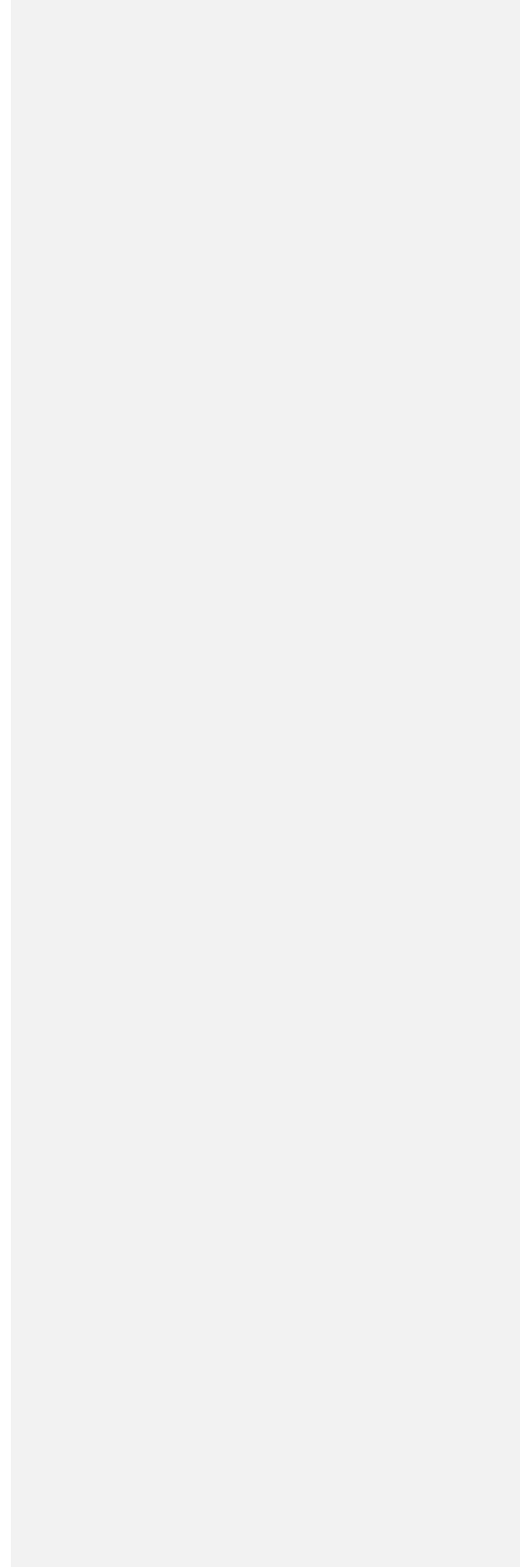


Table 1
Participants by Placement, Educational Functioning Level, Ethnicity, and Sex

Proposed Revision

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Enter the number of participants* by educational functioning level, ethnicity/race**, and sex.

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Placement Educational Functioning Level (EFL) (A)	American Indian or Alaska Native				Asian				Black or African American				Hispanic/ Latino				Native Hawaiian or Other Pacific Islander				White				More than One Race				Total (AD)
	Male (B)	Female (C)	Non- binary (D)	No Answer (E)	Male (F)	Female (G)	Non- binary (H)	No Answer (I)	Male (J)	Female (K)	Non- binary (L)	No Answer (M)	Male (N)	Female (O)	Non- binary (P)	No Answer (Q)	Male (R)	Female (S)	Non- binary (T)	No Answer (U)	Male (V)	Female (W)	Non- binary (X)	No Answer (Y)	Male (Z)	Female (AA)	Non- binary (AB)	No Answer (AC)	
ABE*** Level 1																													
ABE Level 2																													
ABE Level 3																													
ABE Level 4																													
ABE Level 5																													
ABE Level 6																													
ESL*** Level 1																													
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ESL Level 4																													
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ESL Level 6																													
Alternative Placement****																													
Total																													

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Instructions for Completing Table 1

* A participant is an individual in an AEFLA program who has completed at least 12 contact hours in a period of participation.

** See definitions below for ethnicity/race categories.

*** ABE = Adult Basic Education; ESL = English as a Second Language

**** Alternative Placement is for programs designed to result in measurable skill gains of types other than Type 1a. State assessment policy will need to remove participants placed through alternative means from the post-test denominator when calculating post-test rate.

Total: Report each participant only once on this table.

Ethnicity/Race: For instructions on collecting and reporting race and ethnicity data, please refer to "Final Guidance on Maintaining, Collecting and Reporting Race and Ethnicity Data to the U. S. Department of Education," 72 Fed. Reg. 59266 (19 October 2007).

Hispanic / Latino: The participant indicates that he/she is a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture in origin, regardless of race.

American Indian / Alaska Native: The participant indicates that he/she is a member of an Indian tribe, band, nation, or other organized group or community, including any Alaska Native village or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688) [43 U.S.C. 1601 et seq.], which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

Asian: The participant indicates that he/she is a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent (e.g., India, Pakistan, Bangladesh, Sri Lanka, Nepal, Sikkim, and Bhutan). This area includes, for example, Cambodia, China, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black / African American: The participant indicates that he/she is a person having origins in any of the black racial groups of Africa.

Native Hawaiian / Other Pacific Islander: The participant indicates that he/she is a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

White: the participant indicates that he/she is a person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

More Than One Race: The participant indicates having origins in more than one racial category.

Sex:

Male: The participant indicates that he is male.
Female: The participant indicates that she is female.
Non-binary: The participant identifies with being nonbinary or another gender.
No Answer: The participant prefers not to answer.

Proposed Revision

Instructions for Completing Table 1 (continued)

Placement for MSG Type 1a (educational gain via pre- and post-testing)

Consistent with 34 CFR 462.41(a), in programs that compare the participant's initial EFL, as measured by a pre-test, with the participant's EFL, as measured by a post-test, states must measure this specific type of educational gain (MSG type 1a) using only tests that the Secretary has determined are suitable for use in the NRS and the state has identified in its assessment policy.

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Deleted: NOTE for MSG type 1a (educational gain via pre- and post-testing):

Alternative Placement:

At the state's sole discretion, and as documented in the state's assessment policy, states may exempt participants from NRS pre- and post-testing who are enrolled in programs designed to yield outcomes under Measurable Skill Gains (MSG) types 1b, 1c, 2, 3, 4, and 5:

MSG Outcome Type:

1. b) Awarding of credits or Carnegie units.
1. c) Enrolled in postsecondary education and training after exit.
2. Documented attainment of a secondary school diploma or its recognized equivalent.
3. Secondary or postsecondary transcript or report card for sufficient credit hours that shows a participant is meeting the state unit's academic standards.
4. Satisfactory or better progress report, toward established milestones, from an employer or training provider who is providing training.
5. Successfully passing an exam that is required for a particular occupation or progress in attaining technical or occupational skills, as evidenced by trade-related benchmarks.

Examples of such programs may include, but are not limited to, integrated education and training programs, workplace literacy programs, preparatory classes for high school equivalency testing, postsecondary bridge programs, adult high schools utilizing credits or Carnegie units, or other adult education programs designed to yield the MSG outcomes listed above. For these types of programs, states may develop and implement alternative options for the EFL placement. For example, a state may use assessments that are content-driven or performance-driven such as locator tests, criterion referenced tests, diagnostic assessments, authentic assessments, or a state may choose to develop and implement innovative crosswalks between program benchmarks and NRS EFL levels. The reporting of outcomes for participants in such programs must follow the data collection and validation requirements for the specific MSG type. States are not required to exempt participants from pre- and post-testing and may continue to use assessment procedures that best meet the needs of the State's adult education program.

Table 4
Measurable Skill Gains (MSG) by Placement Level

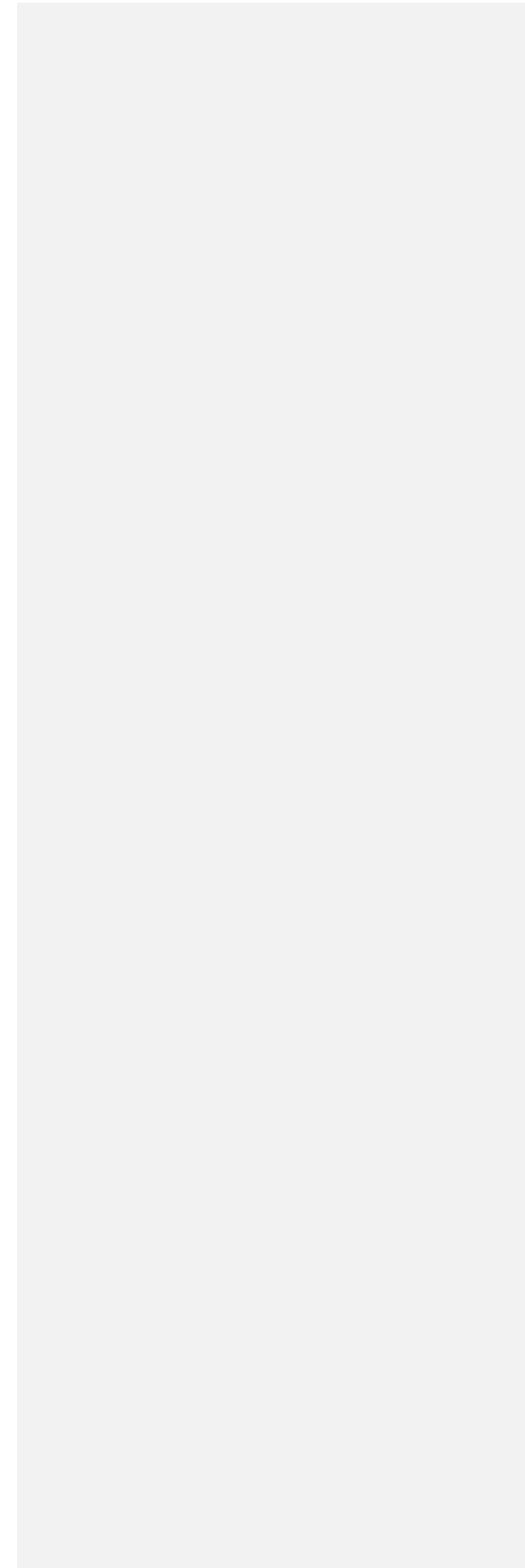
Enter the number of participants for each category listed, total attendance hours, number achieving at least one measurable skill gain of each type, and periods of participation outcomes.

Placement Educational Functioning Level (EFL)	Number of Participants	First Period of Participation							All Periods of Participation						
		Total Number of Participants Excluded from MSG Performance	Total Attendance Hours for all participants	Number who achieved a MSG of Type 1a, 1b, 1c	Number who attained a secondary school diploma or its recognized equivalent (MSG Type 2)	Number who attained credit hours that meet academic standards (MSG Type 3)	Number who achieved a satisfactory progress report (MSG Type 4) or passed an exam (MSG Type 5)	Number Separated Before Achieving Measurable Skill Gains	Number Remaining in Program without Measurable Skill Gains	Percentage Achieving Measurable Skill Gains	Total number of Periods of Participation	Total number of Periods of Participation in which Participants achieved a MSG of Type 1a, 1b, 1c	Total number of Periods of Participation in which a secondary school diploma or its recognized equivalent was attained (MSG Type 2)	Total number of Periods of Participation in which Participants attained credit hours that meet academic standards (MSG Type 3)	Total number of Periods of Participation in which Participants achieved a satisfactory progress report (MSG Type 4) or passed an exam (MSG Type 5)
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
ABE Level 1															
ABE Level 2															
ABE Level 3															
ABE Level 4															
ABE Level 5															
ABE Level 6															
ABE Total															
ESL Level 1															
ESL Level 2															
ESL Level 3															
ESL Level 4															
ESL Level 5															
ESL Level 6															
ESL Total															
Alternative Assessment															
Grand Total															

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 At the state's sole discretion, and as documented in the state's assessment policy, states may exempt participants from NRS pre- and post-testing who are enrolled in programs designed to yield the following outcomes under the Measurable Skill Gains (MSG) indicator: [1]
 → MSG Outcome Type: [1]
 b) Awarding of credits or Carnegie units. [1]
 c) Enrolled in postsecondary education and training after exit. [1]
 Documented attainment of a secondary school diploma or its recognized equivalent. [1]
 Secondary or postsecondary transcript or report card for sufficient credit hours that shows a participant is meeting the state unit's academic standards. [1]
 Satisfactory or better progress report, toward established milestones, from an employer or training provider who is providing training. [1]
 Successfully passing an exam that is required for a particular occupation or progress in attaining technical or occupational skills, as evidenced by trade-related benchmarks. [1]

- Moved up [1]: NOTE for MSG type 1a (educational gain via [1])
- Deleted: E [2]
- Deleted: educational functioning level [2]
- Deleted: number who attain a secondary school diploma [3]
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* **NOTE:** For program year 2020 performance data due on October 1, 2021, the use of columns G and N is permissible but not required. For program year 2021 performance data due on October 1, 2022, the use of columns G and N is required.



Instructions for Completing Table 4

- **Placement EFL or Alternative Placement:** See Table 1.
- For the purposes of reporting measurable skill gain on Tables 4, 4C, 8, and 10, each program entry per participant during the reporting period is considered a period of participation.
- Count each participant only once in columns E through H. Total number of participants in column B should equal corresponding total number of participants in other NRS tables. Report the most recent measurable skill gain for a participant who achieved more than one measurable skill gain during a period of participation.
- The number in Column C is the number of participants who are being excluded from MSG performance due to the exclusion scenarios listed in OCTAE Program Memorandum 17-2 Attachment 2, Table A. No values associated with these participants should be entered into columns E-I.
- The number in column E is the number of participants who completed one or more Educational Functioning Level (EFL) gains **under MSG Type 1** as measured in one of three ways: 1) by comparing a participant's **placement** EFL as measured by a pre-test with the participant's EFL as measured by a participant's post-test; or 2) for States that offer high school programs that lead to a secondary school diploma or its recognized equivalent, an EFL gain may be measured through the awarding of credits or Carnegie units; or 3) States may report an EFL gain for participants who exit the program and enroll in postsecondary education or training during the program year.
- Column F is the number of participants who attained a secondary school diploma or its recognized equivalent (**MSG Type 2**).
- **Columns G, H, and I are the number of participants who achieved a gain under MSG type 3, 4, or 5, respectively.**
- Enter only the most recent achievement, if attained, per participant in column E or column F or column G or column H. Participants should have an achievement counted in only one of these columns.
- Column J is the number of participants who achieved no measurable skill gain and exited the program. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services (services do not include self-service, information-only services or activities, or follow-up services), and there are no plans to provide the participant with future services.
- Column K is number of participants who remain enrolled and achieved no measurable skill gain.
- Column B should equal Column C + E + F + G + H + I.
- Column K is calculated using the following formula: $(\text{Column K}) = (\text{Column E} + \text{Column F} + \text{Column G} + \text{Column H})$
(Column B – Column C)
- Column L is the total number of periods of participation for each participant. A participant may have more than one period of participation. Do not include periods of participation that are excluded from MSG performance due to the exclusion scenarios listed in OCTAE Program Memorandum 17-2 Attachment 2, Table A. No values associated with these periods of participation should be entered into columns L-P.
- Column M is the Total number of Periods of Participation in which at least one **MSG Type 1** gain was achieved. Multiple outcomes are permissible for individual participants with more than one period of participation. Although participants may achieve more than one gain per period of participation, only one gain for a participant per period of participation is reported in EITHER column M or column N or column O or column P.
- Column N is the Total number of Periods of Participation in which a secondary school diploma or its recognized equivalent (**MSG Type 2**) was attained. Multiple outcomes are permissible for individual participants with more than one period of participation. Although participants may achieve more than one gain per period of participation, only one gain for a participant per period of participation is reported in EITHER column M or column N or column O or column P.
- Column O is the Total number of Periods of Participation in which a gain was achieved via Secondary or Postsecondary Transcript. Multiple outcomes are permissible for individual participants with more than one period of participation. Although participants may achieve more than one gain per period of participation, only one gain for a participant per period of participation is reported in EITHER column M or column N or column O or column P.
- Column P is the total number of Periods of Participation in which a gain was achieved through Progress Toward Milestones (MSG Type 4) or Passing Technical/Occupational Skills Exam (MSG Type 5). Although participants may achieve more than one gain per period of participation, only one gain for a participant per period of participation is reported in EITHER column M or column N or column O or column P.
- Column Q is calculated using the following formula: $(\text{Column Q}) = (\text{Column M} + \text{Column N} + \text{Column O} + \text{Column P})$
(Column L)
- **Period of Participation:** For the Measurable Skill Gains indicator, a new period of participation is counted each time a participant enrolls—even if both enrollments occur within the same program year. It is not necessary to wait until the participant exits the program in order to count a measurable skill gain, because the measurable skill gains indicator is not an exit-based indicator. The skill gain may be counted as soon as it is earned at any point during the participation period of the program year in which it was earned. A person with more than one period of participation in a program year is counted separately for each period of participation in both the numerator and denominator of each applicable performance indicator. Therefore, the person is counted multiple times—once for each period of participation. Please see OCTAE program memorandum 17-2 for examples of counting periods of participation.

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Deleted: <#>Column G is the number of IET or workplace literacy participants who achieved an MSG via Secondary or Postsecondary Transcript, Progress Toward Milestones, or Passing Technical/Occupational Skills Exam. For participants **not** enrolled in an IET or workplace literacy program, skill gains are only measured by achievement of at least one educational functioning level or documented attainment of a secondary school diploma or its recognized equivalent.

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Deleted: J... is calculated using the following formula: (Column KJ

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Deleted: K... is the total number of periods of participation for each participant. A participant may have more than one period of participation. Do not include periods of participation that are excluded from MSG performance due to the exclusion scenarios listed in OCTAE Program Memorandum 17-2 Attachment 2, Table A. No values associated with these periods of participation should be entered into columns LK...PN

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Table 4A

Measurable Skill Gain Types 1a, 1b, and 1c

English Language Arts (ELA)/Literacy, English Language Proficiency (ELP), Mathematics, Carnegie Units/Credits, and Transition to Postsecondary Education by Entry Level

Enter number of participants achieving measurable skill gain at each level.

Entering Educational Functioning Level (A)	Number of Participants (B)	Number with EFL Gain For ELA/Literacy or ELP by pre-posttesting (MSG 1a) (C)	Percentage Achieving ELA/Literacy or ELP EFL Gains (MSG 1a) (D)	Number with EFL Gain For Mathematics by pre-posttesting (MSG 1a) (E)	Percentage Achieving Mathematics EFL Gain (MSG 1a) (F)	Number with EFL Gain by Carnegie Units/ Credits (MSG 1b) (G)	Percentage Achieving EFL Gain by Carnegie Units/ Credits (MSG 1b) (H)	Number with EFL Gain by Transition to Post-secondary Education (MSG 1c) (I)	Percentage Achieving EFL Gain by Transition to Postsecondary Education (MSG 1c) (J)
ABE Level 1									
ABE Level 2									
ABE Level 3									
ABE Level 4									
ABE Level 5									
ABE Level 6									
ABE Total									
ESL Level 1									
ESL Level 2									
ESL Level 3									
ESL Level 4									
ESL Level 5									
ESL Level 6									
ESL Total									
Alternative Placement									
Grand Total									

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Instructions for Completing Table 4A

- Column B is the number of participants who achieved a MSG Type 1a, 1b, or 1c gain during the program year.
- Both ELA/literacy or ELP and Mathematics level gains must be reported for all participants utilizing MSG Type 1a, if tested in both areas. EFL gains reported in Columns C and D may be measured by reading, writing, literacy skills, speaking or listening tests approved for use in the National Reporting System for Adult Education (NRS).
- Report Carnegie unit/credit attainment and entry into postsecondary education for participants who achieved these outcomes. Multiple outcomes are permissible on this table for individual participants.
- In each of Columns C, E, G, and I, record the total number of participants who achieved at least one measurable skill gain of that type.
- Calculate Percentages as follows:

- Column D = Column C/Column B
- Column F = Column E/Column B
- Column H = Column G/Column B
- Column J = Column I/Column B

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Table 4B
Educational Functioning Level Gain and Attendance for Pre- and Post-tested Participants
(MSG Type 1a)

Enter the number of pre- and post-tested participants for each category listed, number of post-tested participants achieving at least one educational functioning level gain, and total attendance hours for post-tested participants.

Entering Educational Functioning Level (A)	Number of Participants (B)	Total Attendance Hours (C)	Number with EFL Gain (D)	Number Separated Before Achieving EFL Gain (E)	Number Remaining Within Level (F)	Percentage Achieving EFL Gain (G)
ABE Level 1						
ABE Level 2						
ABE Level 3						
ABE Level 4						
ABE Level 5						
ABE Total						
ESL Level 1						
ESL Level 2						
ESL Level 3						
ESL Level 4						
ESL Level 5						
ESL Level 6						
ESL Total						
Total						

Instructions for Completing Table 4B

Include in this table only participants who are both pre- and post-tested.

- Column B is the number of participants who have received a pretest and posttest.
- Column D is the total number of participants (both exited and continuing) who achieved at least one EFL gain by completing at least one level through pre- and post-testing.
- Column E is the number of participants who achieved no EFL gain and exited the program. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services (services do not include self-service, information-only services or activities, or follow-up services), and there are no plans to provide the participant with future services.
- Column F represents the number of participants still enrolled who are at the same EFL level as when they entered.
- Column D + E + F should equal the total in Column B.
- Each row total in Column G is calculated using the following formula: $G = \frac{ColumnD}{ColumnB}$

Table 4C
Measurable Skill Gains by Entry Placement Level for Participants in Distance Education

Enter the number of distance education participants for each category listed, total attendance hours, number achieving at least one measurable skill gain of each type, and periods of participation outcomes.

Placement Educational Functioning Level (EFL)	Number of Participants	First Period of Participation									All Periods of Participation					
		Total Number of Participants Excluded from MSG Performance	Total Attendance Hours for all participants	Number who achieved a MSG of Type 1a, 1b, 1c	Number who attained a secondary school diploma or its recognized equivalent (MSG Type 2)	Number who attained credit hours that meet academic standards (MSG Type 3)	Number who achieved a satisfactory progress report (MSG Type 4) or passed an exam (MSG Type 5)	Number Separated Before Achieving Measurable Skill Gains	Number Remaining in Program without Measurable Skill Gains	Percentage Achieving Measurable Skill Gains	Total number of Periods of Participation	Total number of Periods of Participation in which Participants achieved a MSG of Type 1a, 1b, 1c	Total number of Periods of Participation in which a secondary school diploma or its recognized equivalent was attained (MSG Type 2)	Total number of Periods of Participation in which Participants attained credit hours that meet academic standards (MSG Type 3)	Total number of Periods of Participation in which Participants achieved a satisfactory progress report (MSG Type 4) or passed an exam (MSG Type 5)	Percentage of Periods of Participation with Measurable Skill Gains
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)
ABE Level 1																
ABE Level 2																
ABE Level 3																
ABE Level 4																
ABE Level 5																
ABE Level 6																
ABE Total																
ESL Level 1																
ESL Level 2																
ESL Level 3																
ESL Level 4																
ESL Level 5																
ESL Level 6																
ESL Total																
Alternative Assessment																
Grand Total																

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* **NOTE:** For program year 2020 performance data due on October 1, 2021, the use of columns G and N is permissible but not required. For program year 2021 performance data due on October 1, 2022, the use of columns G and N is required.

Instructions for Completing Table 4C

- Include only participants who are counted as distance education participants. Distance education participants are also included in Table 4. Participant data for all periods of participation are included on this table, if the participant met the State's definition of a distance education participant during the program year.
- **Follow instructions for completing Table 4.**
- Note: All shaded columns will be calculated automatically by OCTAE's data system.

Table 8
Primary Indicators of Performance and Additional Outcomes for
Participants in Family Literacy Programs

Enter the number of participants in family literacy programs for each of the categories listed.

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First Period of Participation				All Periods of Participation		
Primary Indicators of Performance	Number of Participants Included in the Indicator	Number of Participants Achieving Outcome or Median Earnings Value	Percentage of Participants Achieving Outcome	Total Periods of Participation	Total Number of Periods of Participation in which Participants Achieved Outcome or Median Earnings Value for All Periods of Participation	Percentage of Participants in All Periods of Participation Achieving Outcome
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Measurable Skill Gain						
Employment Second Quarter after exit						
Employment Fourth Quarter after exit						
Median Earnings Second Quarter after exit			N/A			N/A
Attained a Secondary School Diploma/Recognized Equivalent and <u>Employed or Enrolled</u> in Postsecondary Education or Training within one year of exit						
<u>Attained a Postsecondary Credential while enrolled or within one year of exit,</u>						
<u>Attained any credential (unduplicated),</u>						

Deleted: Attained a Secondary School Diploma/Recognized Equivalent and Employed within one year of exit

Deleted: Attained a Postsecondary Credential while enrolled or within one year of exit

Table 8 (continued)
Primary Indicators of Performance and Additional Outcomes for
Participants in Family Literacy Programs

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Family Literacy Follow-up Outcome Measures	Number of Participants who Exited	Number of Participants Achieving Outcome	Percent Achieving Outcome
(A)	(B)	(C)	(D)
Increased Involvement in Children's Education			
Family Literacy Follow-up Outcome Measures	Number of Participants who Exited	Number of Participants Achieving Outcome	Percent Achieving Outcome
(A)	(B)	(C)	(D)
Helped more frequently with school			
Increased contact with children's teachers			
More involved in children's school activities			
Increased Involvement in Children's Literacy Activities			
Reading to children			
Visiting library			
Purchasing books or magazines			
Left Public Assistance			

Instructions for Completing Table 8

Include only family literacy program participants in Table 8.
 Note: All shaded cells will be calculated automatically by OCTAE's data system.

For reporting measurable skill gains:

Enter in column B the total number of Family Literacy program participants enrolled during the reporting period. For column C, follow the instructions for reporting measurable skill gains in columns E, F, G, and H on table 4.

Instructions for Completing Table 8 (continued)

For reporting the exit-based Primary Indicators of Performance:

Follow instructions for completing Table 5 to report these outcomes.

For reporting family literacy outcome measures:

Report in Column B the total number of participants who exited during the program year. Do not exclude participants because of missing Social Security numbers or other missing data.

Achievement of one or more of the increased involvement in children's education or children's literacy activities measures should be counted only once per participant. However, the specific outcome should be recorded in the subcategory and more than one outcome may be reported, so that the total for the three subcategories may be greater than the total reported for the overall category. For example, a participant who helped more frequently with schoolwork and increased contact with child's teachers would be recorded in both categories but would be counted only once in the overall category of "increased involvement in children's education."

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Table 9
Primary Indicators of Performance and
Additional Outcomes for Participants in
Integrated English Literacy and Civics Education

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First Period of Participation				All Periods of Participation		
Primary Indicators of Performance	Number of Participants Included in the Indicator	Number of Participants Achieving Outcome or Median Earnings Value	Percentage of Participants Achieving Outcome	Total Periods of Participation	Total Number of Periods of Participation in which Participants Achieved Outcome or Median Earnings Value for All Periods of Participation	Percentage of Participants in All Periods of Participation Achieving Outcome
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Measurable Skill Gain						
Employment Second Quarter after exit						
Employment Fourth Quarter after exit						
Median Earnings Second Quarter after exit			N/A			
Attained a Secondary School Diploma/Recognized Equivalent and Employed or Enrolled in Postsecondary Education or Training within one year of exit						
Attained a Postsecondary Credential while enrolled or within one year of exit.						
Attained any credential (unduplicated).						

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Deleted: Attained a Postsecondary Credential while enrolled or within one year of exit

Civics Education Follow-up Outcome Measures (Optional)	Number of Participants Who Exited	Number of Participants Who Exited Achieving Outcome	Percent Achieving Outcome
(A)	(B)	(E)	(F)
Achieved Citizenship Skills			
Voted or Registered to Vote			
Increased Involvement in Community Activities			

Instructions for Completing Table 9

Include only participants who are counted as Integrated English Literacy and Civics Education program participants.

Note: All shaded columns will be calculated automatically by OCTAE's data system.

For measurable skill gain: Enter in column B the total number of Integrated English Literacy and Civics Education program participants enrolled during the reporting period. For column C, follow the instructions for reporting measurable skill gains in columns E, F, G, and H on table 4.

For reporting the exit-based Primary Indicators of Performance:

Follow instructions for completing Table 5 to report these outcomes.

For reporting civics education outcome measures:

Report in Column B the total number of participants who exited during the program year. Do not exclude participants because of missing Social Security numbers or other missing data.

Achievement of one or more of the civics education outcome measures should be counted only once per participant.

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Table 10
Primary Indicators of Performance for Participants in Correctional Education Programs

Enter the number of participants in correctional education programs (section 225) for each of the categories listed.

First Period of Participation				All Periods of Participation		
Primary Indicators of Performance	Number of Participants Included in the Indicator	Number of Participants Achieving Outcome or Median Earnings Value	Percentage of Participants Achieving Outcome	Total Periods of Participation	Total Number of Periods of Participation in which Participants Achieved Outcome or Median Earnings Value for All Periods of Participation	Percentage of Participants in All Periods of Participation Achieving Outcome
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Measurable Skill Gain						
Employment Second Quarter after exit						
Employment Fourth Quarter after exit						
Median Earnings Second Quarter after exit			N/A			N/A
Attained a Secondary School Diploma/Recognized Equivalent and Employed or Enrolled in Postsecondary Education or Training within one year of exit						
Attained a Postsecondary Credential while enrolled or within one year of exit.						
Attained any credential (unduplicated).						

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Deleted: Attained a Secondary School Diploma/Recognized Equivalent and Employed within one year of exit

Deleted: Attained a Postsecondary Credential while enrolled or within one year of exit

Instructions for Completing Table 10

Include only correctional education participants under Sec. 225 of WIOA.

Note: All shaded columns will be calculated automatically by OCTAE's data system.

Instructions for Completing Table 10 (continued)

For measurable skill gain: Enter in column B the total number of correctional education program participants enrolled during the reporting period. This indicator includes both released and non-released participants. For column C, follow the instructions for reporting measurable skill gains in columns E, F, G, and H on table 4.

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For reporting the Primary Indicators of Performance:

Enter in column B the total number of correctional education program participants enrolled during the reporting period who were **no longer incarcerated** at program exit. Enter in column C the number of participants who were **no longer incarcerated** at program exit who achieved success in the designated indicator.

Follow instructions for completing Table 5 to report these outcomes.

Table 11
Primary Indicators of Performance for Participants in Integrated Education and Training Programs

Enter the number of all participants in Integrated Education and Training programs for each of the categories listed.

First Period of Participation				All Periods of Participation		
Primary Indicators of Performance	Number of Participants Included in the Indicator	Number of Participants Achieving Outcome or Median Earnings Value	Percentage of Participants Achieving Outcome	Total Periods of Participation	Total Number of Periods of Participation in which Participants Achieved Outcome or Median Earnings Value for All Periods of Participation	Percentage of Participants in All Periods of Participation Achieving Outcome
(A)	(B)	(C)	(D)	(E)	(F)	(G)
MSG 1a via Achievement of atLeast One Educational Functioning Level Gain						
MSG Type 2 via Attainment of Secondary School Diploma/ Recognized Equivalent						
MSG Type 3 via Secondary or Postsecondary Transcript						
MSG Type 4 via Progress TowardMilestones						
MSG Type 5 via Passing Technical/Occupational Skills Exam						
Employment Second Quarter after exit						
Employment Fourth Quarter after exit						

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Median Earnings Second Quarter after exit			N/A			
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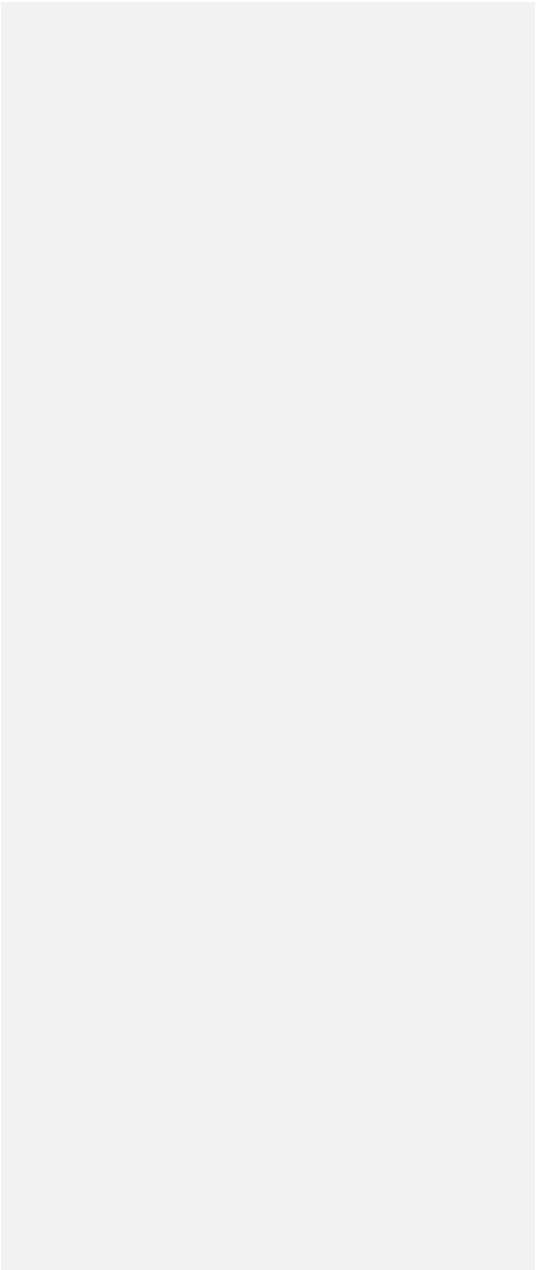


Table 11 (continued)

First Period of Participation				All Periods of Participation		
Primary Indicators of Performance	Number of Participants Included in the Indicator	Number of Participants Achieving Outcome or Median Earnings Value	Percentage of Participants Achieving Outcome	Total Periods of Participation	Total Number of Periods of Participation in which Participants Achieved Outcome or Median Earnings Value for All Periods of Participation	Percentage of Participants in All Periods of Participation Achieving Outcome
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Attained a Secondary School Diploma/Recognized Equivalent and <u>Employed or Enrolled in Postsecondary Education or Training within one year of exit</u>						
<u>Attained a Postsecondary Credential while enrolled or within one year of exit</u>						
<u>Attained any credential (unduplicated)</u>						

Deleted: Attained a Secondary School Diploma/Recognized Equivalent and Employed within one year of exit

Deleted: Attained a Postsecondary Credential while enrolled or within one year of exit

Instructions for Completing Table 11

Include only IET program participants but exclude participants who exited due to the exclusions listed in OCTAE Memorandum 17-2 Attachment 2, Table A. Also exclude from all indicators, except **MSG** gains, incarcerated individuals under WIOA section 225 who exited the AEFLA program but are still incarcerated. All shaded columns will be calculated automatically by OCTAE's data system.

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Report any of the following MSG outcomes for each IET participant. Reporting multiple MSG outcomes per participant is permitted.

For reporting MSG Type 1 via Achievement of at Least One Educational Functioning Level Gain: Enter in column B the total number of Integrated Education and Training program participants enrolled during the reporting period. Enter in column C the number of participants who completed one or more Educational Functioning Level (EFL) gains as measured in one of three ways: **Type 1a**, an EFL gain may be measured by comparing a participant's initial EFL as measured by a pre-test with the participant's EFL as measured by a participant's post-test; or **Type 1b**, for States that offer high school programs that lead to a secondary school diploma or its recognized equivalent, an EFL gain may be measured through the awarding of credits or Carnegie units; or **Type 1c**, States may report an EFL gain for participants who exit the program and enroll in postsecondary education or training during the program year.

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For reporting MSG Type 2 via Attainment of Secondary School Diploma/Recognized Equivalent: Enter in column B the total number of Integrated Education and Training program participants enrolled during the reporting period. Enter in column C the number of participants who attained a secondary school diploma or its recognized equivalent.

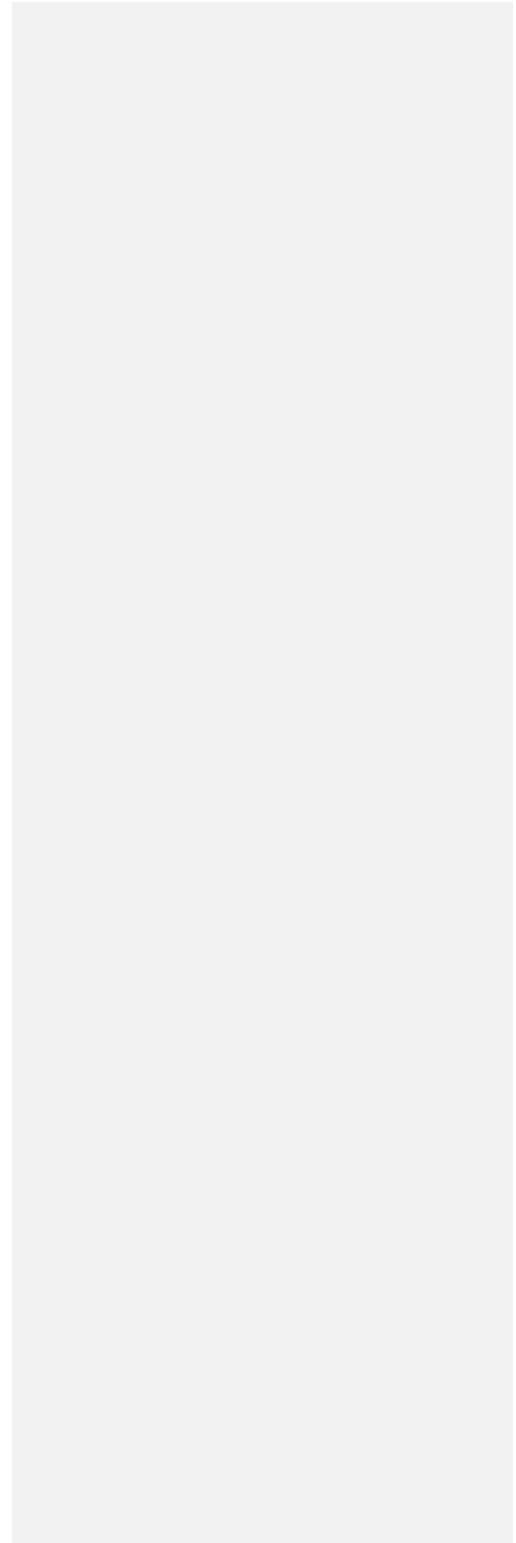
For reporting MSG Type 3 via Secondary or Postsecondary Transcript: Enter in column B the total number of Integrated Education and Training program participants enrolled during the reporting period. Enter in column C the number of participants who demonstrated progress through a secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the Stateunit's academic standards.

For reporting MSG Type 4 via Progress Toward Milestones: Enter in column B the total number of Integrated Education and Training program participants enrolled during the reporting period. Enter in column C the number of participants who demonstrated 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.

For reporting MSG Type 5 via Passing Technical/Occupational Skills Exams: Enter in column B the total number of Integrated Education and Training program participants enrolled during the reporting period. Enter in column C the number of participants who successfully passed an exam that is required for a particular occupation or attained progress in technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.

For reporting the exit-based Primary Indicators of Performance: Follow instructions for completing Table 5

to report these outcomes.



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