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Cover Letter

Dear Director of the Strategic Collections and Clearance Governance and Strategy Division:

<YOUR ORGANIZATION NAME> appreciates the opportunity to provide comments to the US Department of Education (ED) Office of Career, Technical, and Adult Education (OCTAE) regarding the Information Collection Request (ICR or “the ICR”) the Measures and Methods for the National Reporting System (NRS) for Adult Education (Docket Number: ED-2015-ICCD-0004).

NRS Alignment to WIOA Not Yet Complete

The Workforce Innovation and Opportunity Act (WIOA) provided direction and a framework of policy and performance that has result a sea change for AEFLA services transforming adult education and literacy into a full partner in the workforce system as envisioned my Congress.

While ED has implemented activities required in statute and regulations, provided commensurate technical assistance, and made enhancements to the sub-regulatory guidance found in the NRS over the years since passage of the law, additional changes are needed to further or complete ED’s support for state and local implementation of service delivery systems under WIOA to support the laws purpose of increasing access and success for individuals with barriers to employment through opportunities for the employment, education, training, and support services they need to succeed in the labor market.

With over five years to complete data under WIOA, federal and state agencies with local providers and partners have a more complete understanding the shared performance accountability model under WIOA and have developed more enhanced models of supporting jobseekers and employers. While states and providers are implementing the WIOA vision and objectives, the NRS, while advancing some, continues to act as a constraint to realize the full potential of law, hampers, rather than supports state and local efforts to align and integrate services for adult learners and job seekers under the full array of services offered under the Titles.

What the Pandemic Taught Us

In addition to having sufficient data and mature models of WIOA programmatic implementation on which to base recommendations to the NRS, the COVID 19 pandemic has underscored significant weaknesses within the NRS related to testing and the required reporting of all participants within the twelve NRS levels. This required reporting construct initially hamstrung state and local education and workforce continuities and will continue repress or prevent further reopening of vital education and training responses that could support the underkilled workforce population significantly impacted by pandemic-related employment disruptions. These weaknesses have origins back to the Workforce Investment Act of 1998 (WIA) where pre-test/post-testing was the only measure for educational progress.

Conclusion

This ICR presents an exceptional opportunity for ED to further or complete enhancements to the accountability framework for adult education and literacy under WIOA. Comments and recommendations within this response provide models for rectifying these constructs in the NRS and thus support full implementation of the performance accountability under WIOA and alignment with the other WIOA Titles. System enhancements will also liberate state and local AEFLA providers to deliver services to community members hit exceptionally hard by the pandemic and need in education, training

*Draft Suggested NRS Comments for ICR for informational purposes. These are not necessarily the views or comments of COABE.
Comments are in draft form and contain typos, incomplete entries, and references.*

and employment to regain an economic foothold for themselves and their families. <YOUR ORGANIZATION NAME> looks forward to continued participation in the important work related to accountability under WIOA.

Introduction: WIA Legacy Reporting Model Impedes full WIOA Implementation

Programs treasure what they measure and public state and federal funded programs often only measure and implement what they are reported and monitored against. Nowhere else is this more apparent than in adult education.

Unnecessary Constraints

Full implementation of the service delivery models envisioned by Congress to support adult learners, and integration with WIOA partners and employers lags due to legacy reporting constructs and assumptions carried over from WIA in the NRS. These legacy constructs drive reporting and service delivery in ways that reflect an intended or unintended predisposition for the education-for education sake models familiar under WIA. Constructs such as required reporting of all participants by educational functioning level (EFL) combined with a reporting bias supported in the tables that places academic reading, writing math, English language competencies at an advantage over occupational and employment related competencies, which the Title emphasizes in equal measure, has handicapped states and providers in their ability to offer job-seeking adult learners the array of valuable services available under Title II and of great valuable to low-income and low-skilled populations.

Difficult Workforce Collaboration

Adult learners desire services employer need to develop for a skilled workforce; employers needs skilled workers to remain competitive and support their local economies. State and providers, because they are hobbled by legacy reporting requirements, often struggle to collaborate and integrate well as full partners with their WIOA partners including local workforce boards, vocational rehabilitation providers, apprenticeships, and others.

While these partners all operate under the same law and joint reporting framework and are on a mission to support all job-seekers and workers with the skills needed to succeed in the workforce, in many instances you would never know it, as collaborations with employers breakdown or joint implementation meetings get tense as Title II providers fixate on placing WIA-styled academic performance first in any model rather than exercise the flexibility and innovations under the law to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.

Providers Desire to Meet Employer Demand

These legacy reporting models have resulted in uneven and anemic expansion of critical elements of the law which providers desire to implement for students seeking job advancement and for employers who want to contribute. Models like integrated education and training (IET), workforce preparation activities, integrated English literacy civics education, and digital literacy have seen steady growth in adoption, but providers are cautious because the NRS does not provide the framework for which to adequately report these activities for measurable skills gains performance.

The enhancements provided under this IRC are a strong step forward but states and providers are ready for the ability embrace collaborations with employers and be full partners with the other WIOA Titles.

While NRS has slowly progressed in its alignment to the WIOA reporting, states and providers are ready for full integration with the joint accountability provisions required in the Law.

if modified under the recommendation included here, the NRS would create reporting flexibilities and alleviate a series of constraints the NRS applies to WIOA implementation and have restraining ripple effects on services limiting local providers ability to be full education and workforce development response in their local areas, something even more circle during the global pandemic, which is disproportionately impacting adult learners in the labor market and will struggle in employment for several years to come because of skills.

Tyson Foods and other Employers who have regained a foothold during the pandemic and realigned to face the future labor market. They need and want to collaborate to develop skilled workers and be full contributors to reemploy their neighbors in their rebuilding their diverse communities.

This ICR presents an exceptional opportunity for ED to further or complete enhancements to the accountability framework for adult education and literacy. <YOUR ORGANIZATION NAME> believes the following enhance the NRS, strengthen performance outcome for Title IIs and reduce or eliminate state and local behaviors that constrain full implementation of the law.

The federal agencies, states, and local areas have sufficient data and mature models of WIOA programmatic implementation to base these recommendations. <YOUR ORGANIZATION NAME> has worked with a variety of national research, education and workforce organizations as well as employers, to develop these recommendations. They are well considered and represent a consensus of ideas. Organizations have submitted their own responses, placing their own emphasis in areas important to their representative constituencies.

Overview of Recommendations

<YOUR ORGANIZATION NAME> offer the following points of discussion and recommendations regarding Measures and Methods for the National Reporting System for Adult Education. Our comments address both the revised Table IV, Measurable Skill Gains (MSG) by Entry Level and the new Table 99 as well as additional areas within the NRS.

Recommendations are offered such that providers across the nation will be able to maintain service and reporting continuity but have additional flexibilities that support full implementation of allowable Title II service designs, performance accountability under Section 116, and integration with the other WIOA Titles. The recommendations will support adult education as a direct support to those with barriers to employment, especially those hit exceptionally hard by the pandemic who desperately need education, training and employment to regain an economic foothold for themselves and their families and have the elements of the NRS standing in their way.

While the pervasive devastation of the pandemic will end, local and state economic travails from sporadic job dislocations, cyclical economic down turns, and natural disasters are constant. Recommendations provide for creating a durable framework to better support opportunities for the employment, education, training, and support services they need to succeed in the labor market. <YOUR ORGANIZATION NAME> looks forward to continued participation in the important work related to accountability under WIOA.

Recommendation Summary

Under development

Clarification on Terms

To provide succinct and clear comment and recommendations related to the NRS, this response uses specific terms to describe measurable skills gains found in statute, regulation and OCTAE Program Memo 17-2.¹ “Indicator” describes measurable skills gains as one of the five methods prescribed in WIOA to measure participants across the WIOA titles. “Measure” and “Type” are used to describe the various methods a participant can use earn a performance gain through unique type of education or training programs allowable under the statute. While there are five listed measures under the indicator, because there are three approaches to earn a Type 1 MSG—documented achievement of at least one educational functioning level—in practice there are seven programmatic ways a participant can earn performance under the indicator.

Table 1. Measurable Skills Gains Summary from Program Memorandum OCTAE 17-2

Measure Type	Description
Type 1	Documented achievement of at least one educational functioning level 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 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

¹ Available at: <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-2.pdf>

Comment Issue 1. Align the NRS to joint reporting required under WIOA Section 116

Congressional Intent for Joint Performance Accountability

WIOA §116 establishes joint performance accountability indicators and reporting requirements to assess the effectiveness of the six core WIOA programs² in achieving positive workforce and educational results for program participants. WIOA supports the alignment of performance-related definitions and indicators, thereby facilitating comparable data collection and integrated reporting across the programs and program-specific requirements.

Congressional Intent: Title II's Required Adherence to Shared Performance Accountability

Title II §212 of WIOA that confirms adult education and literacy programs are subject to the performance accountability requirements of section 116 of WIOA.³

Congress summarized its intent for joint accountability under WIOA in its Statement of the Managers to Accompany Workforce Innovation and Opportunity Act (Statement of the Managers)⁴ which underscored the importance of joint reporting. Adult education and literacy programs must:

“use the same set of primary indicators of performance accountability outlined for all employment and training activities authorized under this Act.”⁵

Congress further emphasized that, while the act has a strong objective of supporting post-secondary and employment objectives, lower skilled individuals should not be left behind. Specifically, Statement of the Managers emphasized that the measurable skills gain indicator be implemented by the federal agencies such that it accommodates reporting of “educated low level and under prepared adults.”

While Congress wanted to ensure that lower skilled individuals were not left behind in the new law, the Statement of the Managers emphasized that Title II role in implementing integrated and career pathway approaches: “Making sure these skills are solidly in place for *all students* is a priority.” (emphasis added)⁶ Accordingly, program measures for Title II were to be designed to capture not just academic outcomes but diverse set of performance outcomes that document how all participants may show progress in obtaining.

“...a regular secondary school diploma or is recognized equivalent, obtaining full-time employment, increasing their median earnings, and enrolling in postsecondary education or training, or earning a regular postsecondary credential.”⁷

² The six core programs are the Adult, Dislocated Worker, and Youth programs, authorized under WIOA Title I and administered by DOL; the AEFLA-funded program, authorized under WIOA Title II and administered by ED; the Employment Service program, authorized under the Wagner-Peyser Act, as amended by WIOA Title III and administered by DOL; and the Vocational Rehabilitation program, authorized under Title I of the Rehabilitation Act of 1973, as amended by WIOA Title IV and administered by ED.

³ 29 USC 3292: Performance Accountability System

⁴ U.S. Congress. Statement of the Managers to Accompany Workforce Innovation and Opportunity Act. May 21, 2014. Available at: <https://www.help.senate.gov/imo/media/doc/WIOA%20Statement%20of%20Managers.pdf>

⁵ Statement of the Managers, pg.7.

⁶ Statement of the Managers, pg.8.

⁷ Statement of the Managers, pg.8.

While the Statement of the Managers underscored that performance accountability must ensure all adult education participants are considered in the development of the joint performance system, neither the WIOA statute nor Statement of the Managers allow for a subset of measures or separate operational requirements and specifications be applied in Title II, though Congress did specify that not all indicators were appropriate for all programs and Titles and made exceptions. For example, Title III, the Wagner Peyser Act, does not apply measurable skills gains or credential indicators due to the nature of the activity under that Title. Similarly, WIOA Title I Youth adds “or enrollment” in education to the post-exit measures to support in-school youth performance. If Congress had intended Title II to have unique parameters for implementation of measurable skills gains, it would have described these in the statute. It was clear that all students must have a access to the same variety education and training services and be measured accordingly through the joint performance accountability framework.

The Intent of the Secretaries in WIOA Regulations at Section 462

In the regulations at § 463.155, the Secretaries identified a variety of diverse achievements, or measures, that define measurable skill gains (MSG) to gauge progress towards a recognized secondary education or training credential or employment. The six primary indicators of performance applied to the adult and dislocated worker programs (Title I), the AEFLA program (Title II), and the VR program (Title IV).⁸ While WIOA makes it clear that these programs should use the same indicators, it also gave the Secretaries discretion in defining parameters —not removing — measures for the indicators to better align them to the allowable activities and populations services within each Title.

Section §462.41 of the Title II rules pertains to “How must tests be administered in order to accurately measure educational gain in adult education” under the NRS. The section was modified to “support the orderly transition from WIA to WIOA” and conform to the joint performance accountability framework.

These modifications clearly lay out the NRS as *one tool* to evaluate Title II performance making a clear distinction between academic and workforce MSG performance indicators such that “*test administration*” will be used to document the *educational or academic progress*” but that Title II implement “the measurable skill gains performance indicator by requiring the documentation of achievement of *academic, technical, occupational, or other forms of progress*” (emphasis added). In the transition from purely academic pre-test/post-testing performance measurement under WIA, states and local programs were provided ... “more flexibility in reporting outcomes for adult learners.”⁹

The Measurable Skills Gains Indicator

Public comment request Docket Number ED–2020–SCC–0117, specifically requests comment on the measurable skills gains indicator which is defined in WIOA Section 116 as:

“the percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.” (emphasis added)

⁸ 34 CFR § 463.155(1) - What are the primary indicators of performance under the Workforce Innovation and Opportunity Act?

⁹ WIOA Regulations under Executive Orders 12866 and 13563. Regulatory Impact Analysis.

The definition uses “or” rather than “and” to describe the two possible outcomes for participants, a credential or employment.

Joint regulations at §677.155 clarify the indicator to be applied “depending upon the type of education or training program”.

Same Services/ Same Measures

Congress transformed adult education under Title II to be an education and training workforce development program similar to Title I and Title IV through allowable services such as integrated education and training (IET), workforce preparation activities which are measured through the aforementioned joint performance accountability framework used in the other Titles. Similarly, these services are defined the same under the Titles such that the activity definitions are cross referencing definitions across the Titles. For example, workforce preparation activities and integrated education and training are defined for all the Titles in law through cross references to Title II. Workforce training as it is applied to Title II integrated education and training is defined through a cross reference back to Title I. If Congress in law and the Secretaries in regulation established service continuity and a joint accountable model across these services, why are participants measured differently? Because sub-regulatory guidance in the NRS overregulates and applies more restrictive restrictive parameters to Title II participants and providers.

Summary

The WIOA statute, Statement of the Managers, and resulting regulations are clear Title II use the same multifaceted joint performance accountability framework as that used across the other titles to capture documented progress on the measurable skill gain. The current NRS tables apply additional parameters and still maintain reporting remnants biased toward education-for-education-sake academic performance that were developed and implemented under WIA but that are not supported under WIOA. These legacy structures weaken implementation aspects of service delivery related to reporting on the five types of MSG measures (and seven variations) for the indicator which result in additional unjustified costs to state governments and local providers and restricting services to employers and participants as described in these recommendations.

Recommendation

<YOUR ORGANIZATION NAME> recommends the all requirements within the NRS be aligned consistently with the other WIOA Titles as specified in the joint accountability requirements intended by Congress in WIOA Section 116 and the Secretaries in the associated joint regulations. Congress and the Secretaries specified the application MSG method *by the type of program* in which a participant is enrolled, not, as the NRS applies the indicator, by the *WIOA Title through which the program is funded*.

WIOA Titles I, II, IV implement the same activities under the same definitions, including integrated education and training, workforce preparation, and workplace adult education and literacy activities for employers. These activities should be measured the same way across the Titles.

Recommendation 2: Table IV, Column A. Reducing Constraints due to Requiring Educational Functioning Levels for all Participants

The Dream of WIOA Flexibility Differed

Envision the following students: ; An a high school who needs his GED to join the military; an internationally trained nurse in ESL who wants to attend college so she can establish her US nursing credentials; A worker who is told she will not be promoted if she cannot operate a new piece of production automation equipment which requires knowledge of basic proportions and fraction and digital literacy; A young man who wants to apply to college in six weeks, is juggling the costs, especially the costs of taking non-credit remedial courses which he knows he will need because he struggled in math in high school.

These individuals are all eligible Title II participants, but they do not all need an NRS pre-test to begin services and can earn an MSG gain contextualized for their targeted objective with no need for an NRS. But current NRS reporting requires that they all receive a commercial NRS-approved pre-test to be reported.

The high school equivalency student is immediately eligible by backing a secondary credential. The GED Ready[®] exam would best his best diagnostic and indicator for placement; for the nurses, a TOEFL preparation test would be the most appropriate diagnostic; a contextualize basic skills test and digital literacy test for the nervous worker would best address her targeted needs; and, for the hopeful college student, the state college readiness test would be the best indicator for placement and diagnostics in math. Why would we give them a lengthy commercial NRS-approved test that provides an a very generalized and indirect diagnostic to support educational services, is an unnecessary activity and not necessary for them to earn a gain through one of the types of measurable skills gains available under WIOA?

A Leftover Construct That Has Outlasted Its Purpose

In an effort to respond to deep Congressional critique on adult education accountability and questionable assessments and resulting poor student data,¹⁰ OCTAE, and then states and local providers expended a significant about of time, energy and public funding to develop and implement the NRS reporting framework that was eventually implemented in 1997.

Under WIA, OCTAE used the educational functioning level (EFL) as an organizational taxonomy in the NRS to support reporting of national comparable performance data across the states. Under WIA, there was one method to earn education progress performance¹¹— the comparison of a participant’s pre-test with a post-test— so this method was conceptionally sound and supported increased rigor and accountability in the program. Inadvertently, it also disciplined the field well into addressing the diverse range of student objectives with a very limited array of services and assessments best suited for post-test gains and methods of measuring.

¹⁰General Accounting Office (1995) Adult Education: Measuring Program Results Has Been Challenging <https://www.gao.gov/assets/160/155174.pdf>

¹¹ Student at level six could only earn an educational gain through earning a GED.

In 2014 WIOA disrupted and required substantial changes to WIA to improve the nation's workforce development system and align education workforce programs with each other and with the needs of employers for a skilled workforce.

WIOA replaced the single WIA performance method with a diverse variety of methods to document progress known as the measurable skills gains indicator, an assortment of five unique measures with an overall seven variations¹², one of which was similar to the WIA comparison of a pre-test with a post-test method which relies on a participants entry EFL to calculate.

With a variety of contextualized progress methods that have no correlation to EFL, state and national reporting now produces national data with very limited use except the number of participants by level. After that, no calculation on the NRS tables can be reliable made based on the participants initial EFL.

The Impacts of Reporting by EFL

While increase adult education's reputation as an accountable federal program under WIA, the legacy EFL organizational and reporting framework no longer achieves that objective. Now, in fact, the EFL framework presents performance in ways that are inaccurate and misleading due to the diversity of methods to show progress under indicator within the joint performance accountability framework shared with the partner WIOA programs.

Aside from the ambiguous results created by this reporting holdover, there are detrimental ripple effects resulting from the unnecessary pretesting and reporting that is required to establish the levels that reach far beyond misrepresented performance. In summary, required pre-testing and reporting by EFL has the following impacts for which these comments present a resolution:

1. **Dissuades Employers:** Employers and other WIOA partners desire to collaborate and implement the WIOA's flexible and responsive workforce development services models but get frustrated when unnecessary NRS pre-testing slows or complicates implementation and has little relevance of application to these models;
2. **Overregulation:** Creates an additional participant eligibility requirement not in the WIOA statute;
3. **Unjustified Cost Burden:** Places additional costs to states and local public eligible providers due to unnecessary testing, especially now in the recession;

¹² Type 1: Documented achievement of at least one educational functioning level 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 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 exam

4. **Discourages Learners, Reduces Enrollments and Frustrates Employers:** Dissuades enrollment of individuals with career advancement and with postsecondary goals who must take lengthy NRS-approved tests that lack of direct application to these objectives and for which there are better assessments;
5. **Misrepresented Performance:** Presents performance to providers, states, WIOA partners and Congress that is misleading and confusing because reporting taxonomy aligns to only of five method of to show performance, a psychometrically unsound reporting arrangement due to the diversity of available methods to show progress under indicator that have limited or no correlation to the initial pre-test.
6. **Disproportionally Limits Participation Based on Income:** For years has impacted participation in distance education due to in-person testing requirements at enrollment which was exacerbated and still disproportionately impacts low-income populations during the pandemic for who either cannot afford the technology requirements or live in areas where there is limited broadband;
7. **Represses Full Implementation of the Law:** Continues and promulgates the legacy of the now rescinded WIA education-for-education model only that relied on academic post-testing gains for all performance inhibiting and discouraging implementation of innovative services and partnerships promoted under WIOA that are measured other MSG types contextualized for postsecondary education and career advancement.

This recommendation presents options for OCTAE to consider to that remove remnants from WIA that distort reporting, support rigorous performance accountability, adhere to WIOA, and embrace the Statute's flexible options designed to better meet and measure the education and employment goals of participants.

The Importance of Objective Assessment, not Just Testing

Understanding adult learner objectives for returning to education and establishing an initial, objective assessment of their skills development needs is the foundation for effective service delivery. But, adult educators know that standardized academic tests, like those required in the NRS, capture just one aspect of the information needed to effectively diagnose support and measure progress across participant objectives, This is especially true for those who enter with the diverse goals related to earning a high school equivalency or diploma, employment or career advancement, or transition to postsecondary education or training.

Adult educators have long understood that initial assessment of these skills must be achieved in a variety of ways, and that standardized testing is arguably one of the least effective, a point demonstrated in research literature and by teachers and administrators since at least the 1980s and a point that has led community colleges to embrace a multiple measures framework.¹³ The result has been that K-12 and higher education measure progress, promotion, and graduation based on multiple measures for students², and these methods include both performance-based measurement and formative assessments designed for the actual content students learn, contextualized. Adult educators

¹³ Multiple Measures Assessment Project <https://ccrc.tc.columbia.edu/research-project/multiple-measures-assessment-project.html> and Multiple Measures - California Community Colleges <https://assessment.cccco.edu/what-are-multiple-measures>.

implement these still assessments because they care about their students' objectives. Often the commercial NRS-approved tests, while sometimes useful, just becomes a lengthy compliance exercise.

GOOD FOR MOST, NOT FOR ALL

There is no argument that the measurement of skills on objective tests, both academic and technical, serves an important purpose in adult education and training programs and that the MSG Type 1a pre-test/post-test measurement method is effective in measuring performance for the majority of current adult education participants and supports critical measurement of academic diagnostics and class placement. The argument is that this testing is unnecessary and decidedly not the most appropriate measure for *all* participants and interferes in multiple ways with the access and progress of some participants who participate in some of the fastest growing and most popular program models created by Congress in WIOA to transform the workforce and adult education system and address employer and job-seeker needs.

At the onset of services, these activities should be measured through more diverse academic, technical, occupational, or other forms of measurement for which the NRS pre-test is of limited or relevance and simply not used during the course of services.

DISCOURAGES EMPLOYER AND WORKFORCE PARTNERSHIPS

Despite the fact that WIOA is designed to address employer needs, few employers actually participate in Title II services.

Many employers who are often looking for responsive delivery for their workers, become frustrated with excessive testing at the onset, especially when their objectives do not align to the content of the standardized test. The need to use pretest scores to establish different level classes is inconsequential, because employers usually desire to offer services to all workers and have no intention denying some workers access based on their level.

As a result, after giving it a try, many employers simply decline Title II services due to the onerous required and unnecessary and lengthy pretesting and the resulting unfortunate provider preoccupation with pre-test/post-testing which frustrates employers who believed WIOA and Title II was going to be a responsive resource for their upskilling needs.

This frustration continues when adult educators attempt coordinate and co-enroll with other WIOA workforce other partners who understand they operate under the same joint accountability framework, but find adult education operating under its own rules and practices that are leftover from the now rescinded from WIA

For participants who desire to find employment, advance in their career, support their children in online learning, or transition to postsecondary education or training adult education has been very successful in implementing and expanding the diversity of services in WIOA, such as fast growing integrated education and training, digital literacy, and workforce preparation activities. Often too other WIOA Titles desire to co-enroll participants in adult education to accomplish these objectives.

While WIOA Titles I, III, and IV are beholden to the same joint performance accountability framework as adult education with exceptions defined by Congress an NRS pretest is *not required* for all participants in the other Titles. This required pre-testing holdover creates needless testing often limited or wholly unrelated to participant objectives and programs of study. This then leads to over-testing as participants

are given *other* assessments, such a high school equivalency tests, college entrance tests, digital literacy tests, and tests contextualized for specific occupations and training.

These partners know that the pretest has very limited or no relevance to the vast majority of methods participants earn performance in these fast growing WIOA models such as: Achieving a high school equivalency (Type 2 MSG); entering college after exit and earning (Type 1c MSG); accomplishments on contextualized occupational assessments and employment related skills progress (Types 4 and 5 MSGs).

For participants earning performance through these methods, the initial NRS pretest is unnecessary and inconsequential. Administration of these unused tests is costly and takes a significant amount of discouraging time for the student. In these instances, NRS commercial pre-test serves one purpose: Placement on the NRS tables.

DISCOURAGES LEARNERS AND REDUCES ENROLLMENTS

Just as WIOA partners and employers become discouraged so do students. The requirement to pretest all individuals before delivering Title II activities is firmly established in adult education programs and a considerable amount of time and funding is spent on developing policies and guidelines around testing and enforcing these polices though monitoring of local programs who expend a substantial staff time and funding on testing.

For individuals returning to education with specific employment, career or postsecondary transition objectives, standardized testing, the first activity they experience and may last up to six hours spread other several days.¹⁴ This testing, because it does not align to their objectives, causes many hopeful individuals to drop out of intake services due to the length of time and irrelevance of the activity to their goals. Many individuals entering adult education have mustered significant courage to return to school, sometimes after years, and often past failures in education. An individual who can dedicate a few hours a week to class in the evenings who has specific objectives like getting, advancing or keeping or a job, earning a high school equivalency, entering or college, can spend, at a minimum, the two or first three class meetings, often spread over two weeks, to take commercial NRS-approved tests. The result is that many students don't return to class the second or third night due to testing. The test is not designed for their immediate and pressing goals and objective and they vote with their feet.

Pretesting is appropriate and necessary for most individuals, it is not for all.

UNJUSTIFIED COST BURDEN

The impact of required commercial NRS-approved testing for all students frustrates employers, WIOA partners and participants because the test is either unrelated or applicable to accomplish their diverse life skills, academic, occupational, and postsecondary goals and objectives. The requirement is overly restrictive and presents an undue cost burden on States and local programs due to the required purchase of commercial tests and staff time to facilitate testing.

The NRS requirement is so embedded in practice that there is a pervasive understanding in the field, from State directors down to teachers, that pretesting is a required part of Title II eligibility when it has

¹⁴ Note on TABE 11/12.

no basis in WIOA at all, but was carried over from reporting practices established under WIA. The NRS creates a de facto WIOA eligibility requirement with no basis in law or regulation or joint guidance.

While many prospective students will benefit an NRS tests, not all will. Reducing initial test administration would save substantial costs related to purchasing tests, staff time for testing, scoring and data entry, the need for additional staff proctors during peak testing periods, and additional testing space in buildings.

Exacerbated Constraints and Costs During the Pandemic

The global pandemic has highlighted many facets of our lives that, previously, we took for granted. Things that were once the normal course of business, now are either impossible, or must be accomplished with a high degree of care and difficulty. It has also made us consider what is essential in our lives and work, and what is not.

Like most everything, the education sector, including adult education, has been dramatically impacted at all levels by creating an immediate demand for educational services to be provided remotely. As programs retooled after spring break, they immediately realized that testing was impossible and remote testing disallowed in the NRS. As we made this transition in the spring of 2020, these operational constraints helped shine a light on practices and constructs that we thought were needed or required to serve students, but actually are not. For adult educators, the NRS pre-test presents one such constraint.

Restricted Access

While not required by WIOA for eligibility, pre-testing has become a *de facto* required intake element in federally funded programs and students' initial experience returning to education. Many state data systems have been designed to restrict placement into classes until a student has a test score entered into the system. Turing the pandemic this led to a complete cessation of new-student services in the spring of 2020 in many states and location. State leaders and providers had to expend precious time developing new policies and enrollment and data collection work-arounds to accept the growing backlog of individuals experiencing unemployment and in need of adult education services, which alarmed both educators and State officials worried about their economies.

This alarm and cessation of services for individuals impacted by the pandemic was unnecessary and led to countless unemployed individuals not receiving adult education services. It is a situation that States still have not been able to effectively extradite themselves out of well as program year 2020 commences.

Unnecessary Finacial Impacts During a Recession

Additionally, then and now, at a time when demand for services is at an unprecedented level due to skyrocketing unemployment disproportionately impacting Title II eligible populations, state and local budgets are being torpedoed by the recession. Testing costs have risen steeply as providers implement remote testing, which dramatically reduces the number of tests that can be administered at once and requires additional technology for programs and participants.

In the District of Columbia, one adult charter school estimated it would take 38 full-time staff a total of three weeks to remotely proctor NRS assessments in order to begin the 2020 fall session. Fortunately, the adult charter funding mechanism is generous. For Title II grantees operating under Title II only

funding, this situation is unsustainable, and programs must choose whether to reduce class offerings, lay off staff, or serve students outside the NRS.

Employers are also being impacted by tighter budgets and rising costs related to testing. Employers like Tyson Foods, an employer of essential workers protecting the nation's food supply, and other employers providing essential services such as the healthcare industry are seeing their workplace literacy classes cut due to state and local budget reductions because these classes are often smaller and more costly.

[Risky Behavior and Restrictions to Service Based on Income](#)

After test publishers developed detailed protocols to use their products remotely, and OCTAE approved them, providers soon found that remote testing is exceedingly onerous and time consuming to administer. They also found that the process disproportionately excluded the hardest to serve individuals in their community due to digital access and low literacy. As a result, many programs either choose to not serve these new students or take the risky step of opening facilities for on-site testing with social distancing, an activity that presents a very unnecessary health risk due to the hours individuals must spend together testing, and may be against state or local laws that forbidding unnecessary gatherings. It did not have to be this way.

Pre-testing, not required in law, became a major impediment to service implementation during a national crisis. It added and continues to add additional constraints to states and local providers already under extreme pressures to redesign classes for remote delivery and support the burgeoning population of those unemployed, a population disproportionally represented by under-skilled individuals who would most benefit from education and training services to become competitive the labor market.

TABLE DESIGN MISREPRESENTS PERFORMANCE

The NRS is designed and intended to support objective and accurate performance accountability results for the public, states, local communities and Congress. Beyond the unnecessary costs, restricted access, frustrated and students, employers and WIOA partners, the current reporting of initial EFL levels on Table IV produces ambiguous and misleading results that are psychometrically-unsound.

The 12-level EFL taxonomy appears to be a misplaced representation of the familiar K-12 grade level framework where success is measured as student's progress up to the next grade. This construct worked under WIOA due to the singular one-size-fits-all progress framework of pre-testing and post-testing. WIOA disrupted that with its multidimensional WIOA performance framework of diverse MSG allowing progress to be accomplished in a variety of ways not, simply by a single set of academic testing standards.

WIOA progress outcomes are more varied and related to real-world progress across training and occupational accomplishments—entering college or training, earning an HSE, earning a milestone at work or attaining technical or occupational skills based on an exam. The arrangement of all participants by level on Table IV applies one-size-fits-all WIA progress framework to a wide variety of measures that have no relation of a pre-test. This creates the impression that the individual has progressed in relation to the pretest level when in fact the pretest may have no relation to the MSG gain.

For performance management purposes, the aggregate count of students at a level who made a gain by is only psychometrically valid on and already be reported on Table IVb. It has no correlation to performance on table IV.

Illogical Requirements for State Assessment Policies

While participants may earn a measurable skills gain through various available measure types along with post-testing, the NRS assessment policy guidelines still require states to list in their annual, federally approved assessment guide a post-test rate with a specific target of all participants. The rate is the percentage of those pretested (denominator) who both meet that threshold of instruction and take a matched post-test (numerator).

Because not all participants are required to take a post-test, States have no mathematical way to calculate a rate since the numerator is impossible to predict given the various non-posttest MSG outcome options available. The post-test rate is a legacy that is no longer relevant yet OCTAE requires it and federal monitors review states against it.

Summary

An NRS-commercial pretest is not a required component to AEFLA Title II eligibility and local providers can use a wide variety of objective methods to determine eligibility. The requirement for pretesting and reporting all participants by EFL in the tables establishes an undue burden on providers and participants who are being over-tested or given tests not aligned to their objectives. For programs, this means additional costs and needless time spent on activities that do not directly align to the participants goals or program activities. It also has the effect of dampening the enthusiasm of employers and others in engaging in adult education.

The model took years to fully implement and was then worthwhile for objective of state comparability under WIA. Because it is so established, states and providers implement the framework without question even though no it longer delivers the original objective of state comparability and provides for unreliable and misleading representation of state data, which some states admit get noticed by leadership and partners.

The worldwide pandemic brought to light this needless constraint by halting adult education access for new students and discriminating against those who lack broadband to do remote testing. For years the pretest requirement has discouraged students who had other valid workforce and postsecondary transition goals beyond purely academic accomplishments measures on standardized tests. It has also frustrated employers who desire to hire and upskill workers and WIOA partners who want to collaborate on workforce development efforts.

The recommended modifications to Table IV below can alleviate these constraints and provide an reporting model that will deliver flexible options for student intake, better alignment to WIOA models, like integrated education and training, workforce preparation and workplace adult education and literacy, reduce costs and reporting burden on state and the local providers, and build alliances and partnerships with employers and WIOA partners.

Allowing states to report participants whose eligibility is established through other objective methods would reduce glaring inefficiencies and burdens in service delivery for participants and undue costs to states.

Recommendation

Recommendation: Include on tables that arrange participants by EFL level an entry for both ABE and ESL participants who are found eligible through methods other than a commercial NRS-approved tests.

Placing a category on the tables below Level 6, labeled either “Other Assessment,” Non-leveled,” or “Other Participants” would both maintain consistency for the vast majority of students who use commercial NRS-approved tests, but open access and accurate reporting for the growing number of participants who are accessing Title II services for which commercial NRS-approved tests are not suited. States would not be required to record the method or tests type nor report these test scores through the NRS, but states could opt to collect this data, a practice some states already undertake for tests such as state college readiness and high school equivalency preparation tests.

Recommendation 3: Table IV, Column G and N: Expand Reporting Flexibility in Activities Designed for Employers or that Support Workforce Preparation

Introduction

<YOUR ORGANIZATION NAME> applauds the expansion of reporting parameters to table IV outlined in the ICR which allows for all MSG indicator measure types to be reported for integrated education and training activities but propose additional expansion of reporting in activities designed for employers or that further workforce preparation to support participants entering or advancing within a specific occupation or occupational cluster as intended in the Statute.¹⁵

This recommendation supports stronger alignment to the flexibility Congress provided through the MSG indicator for capturing documented academic, technical, occupational, or other forms of progress through these types of activities.

Defining Activities that Support Entry or Advancement in Postsecondary Education or Training and Employment in Title II

In addition to basic education activities, WIOA introduced a wide variety of activities specifically designed to support participants in education or training programs that leads to recognized postsecondary credential, employment or career advancement, including integrated education and training, workforce preparation and workplace adult education and literacy activities (workplace literacy).¹⁶

Proposed changes to table 4 in the ICR expand reporting flexibility under the MSG indicator for integrated education and training programs. The logic is that since IET programs provide education, training, and employment activities performance can be reported through either academic *or* occupational outcomes. By their very definitions, workforce preparation and workplace literacy activities also support education, training, and employment outcomes. We recommend OCTAE apply the same logic on table IV to expand reporting flexibility.

¹⁵ 20 CFR §677.155(a)(1)(v)

¹⁶ WIOA §203(2) defines adult education and literacy activities as “programs, activities, and services that include adult education, literacy, workplace adult education and literacy activities, family literacy activities, English language acquisition activities, integrated English literacy and civics education, workforce preparation activities, or integrated education and training.”

The NRS Restricts Reporting of Worker Productivity in Programs with Employers

Similar to IET models, workplace literacy activities with employers in Statute, are designed to support the educational and career advancement and improve the productivity of the workforce¹⁷. These programs are provided in collaboration with an employer and employee organization. They are often offered onsite and instruction is often contextualized. Competencies taught are contextualized to address specific occupation outcomes and, as such, are poorly measured by commercial academic NRS-approved tests. Classes are often short term as a result of the discrete outcomes desired by the employer or the availability of workers to participate.

While workplace literacy activities are intended to result in “worker productivity gains”, the NRS restricts reporting to academic outcomes under the measurable skills gains indicator to just two of the five available MSG methods: educational functioning level (Type 1) and earning a high school diploma or equivalent (Type 2). By restricting reporting to just reading, writing, mathematics, and English proficiency competencies outcomes gains by students and desired employers are not reported and the academic outcomes reported are often poor due to the misalignment of objectives thought and measured reported. As a result, providers are often dissuaded in supporting local business need as they worry about performance. As a result, programs are often short-lived, employers get frustrated with provider’s reoccupation with contact hours and standardized testing question their attempts to work with public education. Ultimately, working students loose out and miss out on upskilling opportunities, related advancement, and wage gain because of restiveness in the NRS. The very core purpose of WIOA

Despite the demonstrated value of workplace literacy activities for participants and employers, few states and local programs implement these services. We believe the current restrictiveness in reporting within the NRS may be the reason for such constrained implementation of a service so valued by employers and desired by workers. In program year 2017-2018, states showed very low enrollments in these programs and 22 states reported no reported participants in workplace literacy activities.¹⁸ Texas, a state with nine Tyson Foods plants, some of which are some of these largest employers in very rural workforce areas, was bucked that trend serving 22% of the workplace literacy student population within the 50 states and U.S. territories.¹⁹

The Promise of Expanded Reporting for Workplace Literacy Activities

Workplace Literacy are defined to support worker productivity.²⁰ Employers define “worker productivity” through a wide variety of measures and milestones that reflect outputs such as increased production cycle time, reduced waste, decreased safety instances, and improved customer service.

¹⁷ WIOA §203(16)

¹⁸ As cited in Green, A. (2020). Texas Hold'em: Engaging Employers to Close the Skills Gap. Coalition on Adult Basic Education Journal, Spring 2020. Program year 2017-2018 is the last full year data is currently available. Federal AEFLA performance information is available as of March 3, 2020 at <https://wdcrobcolp01.ed.gov/CFAPPS/OVAE/NRS/login.cfm>

¹⁹ *ibid*

²⁰ WIOA §203(16) defines workplace adult education and literacy activities means adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.

Other human resource measures include measures such as job retention, improved communication with supervisors, work satisfaction, and loyalty to the company.

There are multiple options within WIOA that OCTAE could exercise to better support employers and workers through the NRS.

OCTAE could expand reporting for workplace literacy on table IV is the way it did for IET models. The Type 4 MSG measure (*progress reports towards established milestones from an employer*) and Type 5 (*an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks*) (Type 5) would greatly increase the options that adult education providers could use to meet the discrete services and outcomes employers desire and workers need. This would also increase adherence to Congresses' intent that workplace literacy improve the productivity of the workforce.

In addition, the NRS could better recognize and support the academic gains learned in some workplace literacy programs by encouraging the development of contextualized academic assessment tests that could report by EFL. Tests such as the CASAS Employability Competency System (ECS) tests and CASAS tests contextualized for Health Occupations, Clerical, Food Service, Auto Mechanics were once popular tests. In an aberrant twist though, while WIOA was compelling adult education to produce better employment-related outcomes, the NRS test approval process was driving test publishers to develop academic-only tests resulting in a tests that last up to six-hours²¹ and has no direct relevance to the competencies employers desired by employers or needed by workers looking to retain job or career advancement. The NRS is at cross purposes with WIOA.

Expanding table 4 reporting for workplace literacy also has a multiplier effect, as increased worker productivity also brings tangible value to workers participating in workplace literacy programs, such promotion and wage lift which support other WIOA performance indicators related to the *employment, earnings, and effectiveness is serving employers* measures.

Forgotten in Federal Reporting: Workforce Preparation Activities and Digital Literacy

Similar to integrated education and training and workplace literacy activities, workforce preparation activities are implemented under Titles I, II and IV of WIOA to support training and employment outcomes for participants.²² Unlike Titles I and IV, which allow reporting of participants in these activities to use all of the available measurable skills gains measure types, The NRS restricts reporting to just the academic Type 1 and 2 measures, similar to the restrictiveness applied to employer-based workplace literacy programs.

Like workplace literacy the NRS fails to include guidance how states should report workforce preparation activities. They are imbedded in OCTAE's Framework for Employability Skills the Educational Functioning Level Descriptors for the NRS but, because of the wide variety of competencies available

²¹ The TABE 11/12 test, of the most popular in adult education programs is significantly longer than the SAT, ACT, LSAT, and GRE.

²² WIOA §203(17) defines workforce preparation activities' as activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

within the activity definition, do not all produce the basic education academic outcomes measured by commercial NRS-approved tests.

Local providers implement, or desire to implement, a wide variety of these important activities—digital literacy, college prep bootcamps, resume writing— but consistently have concerns related to how to report such activities “to get a gain”. The result is that there is inconsistent implementation of these activities, or programs feel like they must do these activities “under the table” and not report them. Programs, and even whole states, are, at best, befuddled as to how to implement these activities, or, at worst, uninterested in offering or supporting these activities that very few would argue are not fundamental to adult learner success.

Digital literacy specifically, which has become the default “first class” all adult learners must master during the pandemic and will most likely remain an important option for future, is impossible to report as an academic skill measured by commercial NRS-approved tests. While there are very effective objective assessments for digital literacy, such as Northstar Digital Literacy, the limits of the NRS prevent these outcomes from being reported even though they could be through other MSG types and are reported by programs under other Titles. These skills are becoming more and more pervasive in programs nationally and but are lost in reporting.

The intent of WIOA was to support adult education as a full workforce development partner to support the economic success of adult learners and act as a support to lift individuals out of poverty. Rather than embrace this mission, the NRS, with its adherence to legacy academic-only reporting for activities such as workforce preparation activities and workplace literacy suppresses the ability of providers in supporting learners on that mission. Few would deny these activities produce a tremendous amount of critical transferable learning outcomes for participants, they just can’t be reported in limited options available through the NRS.

Summary of Table IV, Column G and N Comments

WIOA places a strong emphasis on an employer-driven system and underscores this, perhaps most directly, through the inclusion of employers themselves as eligible recipients of AEFLA funds²³ and with performance indicators such as Effectiveness in Serving Employers shared by all Titles, including adult education. Given that, the current NRS reporting limitations for workplace literacy and workforce preparation activities restricts providers in being full partners with employers and other WIOA partners and blunts the ability of providers to effectively support participants who access adult education to build skills needed to prepare for work or college.

<YOUR ORGANIZATION NAME> suggests OCTAE permit reporting of *workforce preparation activities* and *workplace literacy* across all available measurable skills gains applying the same logic it used to expand reporting for *integrated education and training* under the proposed ICR. Congress defined these activities in a way that includes services that lead to a broad array of objective education and employment preparation outcomes. Titles I and IV providers use workforce preparation activities for similar services for adults and youth and are not restricted in their measurable skills gains reporting.

²³ Employers are eligible recipients for AEFLA funds, in partnership with other eligible entities such as a local education agency, institution of higher education, or community-based organization.

Recommendation for Table IV, Column G and N Comments

Retain the proposed expansion of reporting for *integrated education and training* described in the IRC and expand this flexibility to *workforce preparation activities* and *workplace literacy* on Table 4, though the following edits:

Revise Column G on Table 4 to read:

“Number of ~~HEF~~ participants in postsecondary education or training transition or career advancement activities who achieved an MSG other than EFL gain and secondary school diploma.”

Make a similar edit to column N. Make corresponding edits to the notes for columns G and N. Add a note that define the applicable program activities such as: “Activities for the purpose of postsecondary education or training transition or career advancement mean integrated education and training, workforce preparation activities and workplace adult education and literacy activities.

Comment Issue 4: Comment on Table IV

Under development

Comment Issue 5: Comment on Table IV. Clarification of Postsecondary vs. College Level Definitions

Under development

Comment Issue 6: Comment on Table 99

Under development

Comment Issue 8: Table 4c. Distance Education Reporting

Under development

Comment Issue 9: High School Diploma/ Equivalency Reporting

Under development