



September 20, 2020

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

The Arizona Association for Lifelong Learning (AALL) appreciates the opportunity to provide comments to the US Department of Education (ED) Office of Career, Technical, and Adult Education (OCTAE) regarding the Measures and Methods for the National Reporting System (NRS) for Adult Education (Docket Number: ED–2020–SCC–0117). AALL is the state association for adult education in Arizona, representing 13,000 students served each year and 600 adult educators in 20 WIOA funded programs. We provide support to teachers and adult learners across the state through networking, communication, professional development and awareness raising about the importance of adult education in our workforce development system.

OCTAE is proposing to continue the tables, reports, data elements, and instructions that make up the current Adult Education National Reporting System (NRS) but with changes in two areas: (1) in Table 4 (Measurable Skill Gains by Entry Level), the introduction of two new columns, along with changes in some of the instructions; and (2) the introduction of a new Table 99 (Indicator Denominators for Statewide Performance Report).

Comments and recommendations within this response support full implementation of the performance accountability under WIOA and alignment with the other WIOA Titles, and allow AEFLA providers the flexibility they need to design and implement services to families in need. Our communities have been hit hard by the pandemic. AALL supports the adult education providers in Arizona to be nimble and responsive for our students who need education, training, and employment to improve their quality of life.

Recommendation #1: On Table 4, allow Title II the ability to report all types of Measurable Skills Gains, in alignment with the other core WIOA titles

Retain the proposed expansion of reporting for integrated education and training described in the IRC AND expand reporting on Table 4 to include reporting across all types of measurable skills gains as described in the joint guidance [OCTAE Memorandum 17.2](#) / DOL Labor Training and Employment Guidance Letter 10-16 for workplace adult education and literacy activities and workforce preparation activities.

Recommendation #2: On Table 4 to, expand guidance to allow reporting of all postsecondary work during and beyond time in Title II

Students enter Title II programs at any time during the year. Having exit measures that can correlate to MSGs but must be achieved after 90 days of no service excludes participants in the fourth quarter of the program year since exit is required and the measure must be accomplished in the program year that ends June 30. Likewise, programming that co-enrolls or collaborates with colleges, training programs or employers may need to span the reporting timeframe, and thus, students enrolled in those classes or programs will count against program performance when measured on June 30. This complicates partnerships and/or creates a need for programs to pre- and post-test students on accelerated timelines just to get an assessment by June 30. More flexible reporting periods would better account for student outcomes.

The true functionality of Periods of Participation (PoPs) is unclear. In reality, students may need to step out and back into Adult Education programming throughout a fiscal year. PoPs are not a true indicator of student persistence and fail to accurately reflect the progress a student may make in a fiscal year with separate periods of participation. Table 4 attempts to capture data from all PoPs yet Table 4B only looks at the first PoP, which adds to confusion in interpreting outcomes.

- Remove “exit” from the table descriptor and clarify that transition to postsecondary education or training is transcriptable even if concurrent with Title II. Programs have increased concurrent IET offerings that include credit bearing programs. Counting postsecondary gains for students who are enrolled in adult education programs, before separated, will allow programs to count outcomes that are generated with new WIOA IET goals.
- Clarification of postsecondary vs. college level: Recognize that some recognized postsecondary credential types are within the purview of WIOA title II and other community based partners. Clarify that a recognized postsecondary credential includes a range of credentials, some at college-level and many not at college-level per shared guidance in https://wdr.doleta.gov/directives/attach/TEN/TEN_25-19.pdf (Apprenticeship)

Recommendation #3: Permit reporting of all High School Equivalency diplomas.

As currently formatted, the federal tables do not help programs or states to track the total number of High School Equivalency diplomas (HSED) each year. Yet, this is the data point that is most requested by local and state stakeholders when evaluating the effectiveness of adult education programming.

Table 4 recommendations:

- Capture ALL HSEDs in the columns on Table 4; AND/OR
- Create a Table 4d which captures all HSEDs and disaggregates HSED totals by type, e.g., GED®, TASC®, competency based; etc.

Table 5 Recommendation:

- Revise guidance on Table 5 to remove “9th grade equivalent or higher” language as it has no consistent meaning in federal reporting. Expanding to all levels will better capture the real impact of Adult Ed programming.

Recommendation# 4: Eliminate the use of July-June timeframe for reporting and remove Periods of Participation (POPs)

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Recommend the elimination of:

- “After exit” requirement for successful completion of outcomes; and
- Tracking of Periods of Participation (PoPs)

Recommendation #5: Expand gender and race categories for self-reporting

In the current context, requiring students to choose from a limited and outdated list for self-identification around gender and race risks losing participant engagement. It creates the potential for students to feel unrepresented and unsafe. Allowing for optional self-reporting of gender identity and race shows inclusivity and respect for all participants.

- Eliminate required self-reporting as male or female
- Expand options available for self-reporting of Gender Identity, and/or make self-reporting optional, not required
- Expand options available for self-reporting of Race, and/or make self-reporting optional, not required

Additional Concern: NRS testing requirements do not meet the needs of learners or WIOA providers

The system requires adult education programs to administer standardized assessments that are time-intensive, expensive, and available from only a limited number of vendors. We are

concerned about equity-related problems of the standardized assessments and about over-testing of students. There are movements in education across the country - including K12 and college systems - to adopt multiple measures of readiness for college/career and assessment of skills gains. We know the importance of standardized assessment of students across the country, and we're ready to help create and implement a system that will better serve our students by removing barriers and using various methods of evaluating their skills upon entry and before exiting.

- *Anecdotal examples that illustrate the fact that standardized TABE© tests are outdated:*

- *A college-educated English language learner who wants to attend college; A GED© seeker; A worker who is told he will not be promoted without higher reading and math skills; A student who wants to go to college in four weeks, is worried about the costs, and likely needs remedial courses because her math skills are weak.*

These are all eligible participants under AEFLA, but they are participants who do not need an NRS pre- test to begin services, in fact, none of them do.

For the first, a TOEFL/ibt (internet based testing) test may be the best diagnostic for skill deficiencies related to the test he has to take for college admission. For the individual wanting her GED©, the GED Ready© exam is the best indicator of performance for the test, not a TABE© test. The worker needs a test customized for the skills needed at that workplace and his employer would be frustrated if the initial six hours of the workplace literacy class was spent on a TABE© test. The hopeful college student has four weeks and needs an intensive "college boot camp" math class. For her tests associated with that high-stakes college entry exam are most important, but the program will spend hours giving her a TABE, then, the tests associated with college entrance.

The NRS pre-test is an unnecessary activity for these individuals and not necessary for them to earn a gain through one of the types of measurable skill gains available under WIOA.

Thank you again for the opportunity to comment on the NRS. We understand that some of our suggestions and concerns extend beyond the scope of the changes proposed by OCTAE at this time, but the field of adult education has transformed over the last few years and we feel the NRS needs to be updated more broadly to adequately track our progress forward. AEFL providers have developed more enhanced programming and initiatives to support both jobseekers to increase their education and skills attainment and employers to find skilled workers. Adult education has a great impact on our workforce systems and the economy at large when the ripple effect extends to our students' families and communities and across generations.

On behalf of the board of directors for Az Association for Lifelong learning, thank you for your attention.

Laura Porfirio
AALL President
lporfirio@pima.edu
520-206-3809