

September 19, 2020

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

We write on behalf of Briya Public Charter School in support of the proposed changes to NRS Table 4 to give credit to students in Integrated Education and Training (IET) programs who achieve a Measurable Skills Gain (MSG) through a secondary or postsecondary transcript, documentation of progress toward a milestone, or the passage of an occupational or technical skills exam. The school would additionally support extending this credit to students who make these same gains in other types of programs (such as ESL, ABE, EL/Civics, Family Literacy, and other workforce programs).

The proposed change will recognize the diverse types of progress made by adult learners in WIOA-funded programs. It is critical to count these additional MSGs on Table 4 (not just on a separate additional table) to display the entire picture of the types of progress made by adults. In a hypothetical example, consider a program that serves 250 students – 100 students make an EFL or diploma gain as credited currently on Table 4, 100 students make one of the newly proposed MSGs, and 50 students make no progress. The current Table 4 would show that only 100 of 250 (40%) of students made a measurable skills gain (i.e., EFL, high school diploma, entry to post-secondary). Another table, such as the current Table 11, would show that only 40% of students made progress on one of the other proposed MSGs (progress toward milestones, transcript, or occupational skills exam). This divided picture of progress significantly underrepresents the scope of skill gains made. The proposed new format will more accurately recognize that 80% of students made key MSGs directly related to career and educational needs.

In today's climate it is critical to expand the definition of adult and workforce education progress beyond performance on standardized literacy and numeracy exams. In addition to having a historical lack of equity, standardized exams are often not closely aligned to the ultimate goals of students. Integrated Education and Training students complete an academic year of coursework that includes adult education, workforce training, and workforce preparedness skills. They receive standardized pre- and post-testing and are closely tracked in their literacy and numeracy progress throughout the year while they simultaneously gain skills to be prepared for the workforce and for their target field of employment. Next, at the beginning of the second program year, students are ready to take their credentialing exam as well as complete an externship or practicum required for credentialing. Students at this point

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are very close to earning a credential and are and are focused on that goal rather than on general literacy and numeracy skills. The existing Table 4 would require these students to take at least one additional set of post-tests to try to make an Educational Functioning Level gain to meet the reporting expectations of the program. These students should instead be allowed to focus on the next step of credentialing. Crediting of an MSG for these students for passing an occupational skills exam or making other progress toward milestones would mean that students and programs could be evaluated on students' most immediate goals rather than on skills targeted the previous year.

The NRS should recognize all forms of progress toward goals of employment, literacy progress, credentialing, secondary diplomas, and post-secondary education and training. It is important to show this full picture to communicate the success of adult and career training programs to stakeholders. Furthermore, a broader, more flexible Table 4 allows programs to target instruction, assessment, and support services to the needs of adult learners rather than the needs of programs.

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