



September 16, 2020

Director  
Strategic Collections and Clearance Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Ave SW, LBJ, Room 6W208D  
Washington, DC 20202–8240

Re: Document ID ED-2020-SCC-0117

Dear Sir or Madam:

I am writing to provide the comments of the Coalition on Adult Basic Education (COABE) on the proposal of the U.S. Department of Education, Office of Career, Technical and Adult Education (OCTAE) for a revision of the “Measures and Methods for the National Reporting System for Adult Education,” as set forth in the July 23, 2020 Federal Register. COABE is the national organization that provides leadership, communication, professional development, and advocacy to adult education and literacy practitioners to advance quality services for all adult learners.

In the materials accompanying the Federal Register notice, OCTAE proposed 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). In the paragraphs that follow, we first provide our comments on OCTAE’s proposed revisions to the NRS and then express broader concerns about other elements of the NRS and the reporting system in general.

**Table 4: Measurable Skill Gains by Entrance Level**

In Table 4, States report the number of participants at each educational functioning level (EFL), attendance hours by level, and the number of participants at each level who achieved or did not achieve a Measurable Skill Gain (MSG). OCTAE proposes to add a requirement that States also report, the number of participants in Integrated Education and Training (IET) programs who achieved a MSG other than an EFL gain or secondary-school completion with the count of students including those who achieve a MSG through a secondary or postsecondary transcript, documentation of progress toward a milestone, or the passage of an occupational or technical skills exam. OCTAE also proposes revising the instructions to call for the exclusion of certain periods of participation from Table 4 reporting, such as periods when a participant is incarcerated or has exited a program in order to receive medical treatment.

COABE has concerns with the proposed changes to Table 4. First of all, we question why certain MSGs are only applicable to IET students and not available outcomes for all students. Second, we believe it would be unnecessary to break out IET participants in Table 4 (making an already unwieldy and cumbersome table even more so) when MSGs for IET students are already counted in Table 11.

### **Table 99: Indicator Denominators for Statewide Performance Report**

OCTAE proposes the addition of this new table, which would present the denominators for each indicator in the SPR. OCTAE's supporting statement asserts that "this table will be used for intra- and inter-table system validations and to automatically calculate the performance for each indicator in the SPR, thus eliminating the need for respondents to enter the rates for each indicator."

COABE believes that Table 99 would be duplicative and that it would not automatically calculate the performance rates because, if we understand it correctly, States would still be required to complete additional calculations.

### **Additional Concerns**

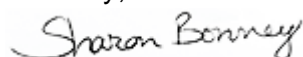
As noted above, in addition to our specific issues with OCTAE's proposed revisions, COABE has broader concerns with the NRS that we would like to raise at this time. In doing so, we hope to begin a dialogue with OCTAE about the purposes and uses of the NRS, the extent to which its various elements are strictly governed by the statutory requirements of the Workforce Innovation and Opportunity Act (WIOA), the extent to which it collects data on outcomes that are truly meaningful to adult education and literacy programs, the burden of maintaining the system (and how that burden can be reduced), and, in all, how the NRS can best serve both policymakers and adult education and literacy programs. These broader concerns follow:

- Overall, the tables in the NRS do not provide meaningful data on what adult education programs are accomplishing (bringing adult learners from one level to the next, enabling secondary-level learners to attain high school equivalency, enabling English learners to attain English language proficiency). For example, the current measurement requirements account only for the highest measurable skill gain of an individual without regard to measurable skill gains attained throughout the reporting period. This makes the NRS a poor tool for use in justifying the programs to Congress, State legislatures and other public and private funders, even with all the time and effort required to maintain the system. The NRS thus not only does not generate meaningful data outcomes and goal requirements but is deleterious to students', communities', and stakeholders' morale and support.
- The workforce-related performance measures are not appropriate measures of the performance of Title II adult education programs. Tracking those workforce outcomes is a very complex and labor-intensive process for local adult education providers and State offices, and the annual reporting timeframes do not align well with adult education programs.
- The periods of participation (POPs) used in the NRS, which apply across the various WIOA Titles, do not correspond with Title II as they may with other titles. Their use complicates the reporting process and they do not accurately reflect the reality of Title II programs.
- The use of the standard POPs specifically complicates reporting in Table 4, and the structure of the table makes it impossible for programs and States to report all the MSGs participants have gained.

- With respect to Table 5, we are concerned that the table limits the reporting of participants who attained high school equivalency (in a manner that is not done in Table 4). Further, the table uses outcome measures that are out of reach for probably 90 percent of Title II students while failing to capture outcomes that are actually meaningful and valuable. Again, this directly impacts the ability of adult education programs to accurately portray and justify programs to varying stakeholders and supporters.
- The system fails to recognize that high school equivalency (HSE) is a very important outcome in itself, whether or not a student goes on to postsecondary education. For example, many learners, who receive an HSE are incarcerated in our local, state, and federal correctional institutions and do not have the ability to pursue postsecondary education. Currently, none of the tables collects data on all high school equivalency diplomas which eliminates a considerable number of reportable HSEs.
- The system does not provide for reporting of the transition of a student from secondary to postsecondary instruction if the student is co-enrolled in an adult education and literacy activity and in postsecondary-level programs.
- 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.
- The data captured in the distance education (DE) breakout tables (4C and 5A) are no longer meaningful. As the definition of “distance students” is determined by individual States, there is a lack of consistency in reporting. Additionally, as States more fully integrate DE into instruction (which began even prior to COVID-19), it makes more sense either to remove the table and consider DE to be another instructional method or to count all students who participate in distance education irrespective of number of hours or percentage of time spent in DE.

Thank you for the opportunity to comment on OCTAE’s proposal for continuation and revision of the NRS. Again, while our comments likely extend beyond the issues that OCTAE had intended to consider at this time, we believe that they illuminate serious problems with the system that must be addressed for the data to be useful. We hope to initiate a dialogue with OCTAE on how to fix those problems. If we can begin that conversation, or I can be of any other assistance, please do not hesitate to contact me.

Sincerely,



Sharon Bonney  
Chief Executive Officer  
Coalition on Adult Basic Education