

**Response to Request for Comments regarding Docket ED-2020-SCC-0117,
Changes to AEFLA Reporting Table IV of the NRS, Document Number 2020-15990.**

My name is Kristin Hempel, Associate Director of Adult and Community Programs at EASTCONN in northeastern CT. I am an executive board member / PD Task Force chair for the CT Association of Adult and Continuing Education (CAACE) and Region 1 Representative and Student Leadership Chair for Coalition on Adult Basic Education (COABE).

The proposed changes to AEFLA Reporting Table IV of the NRS seek to increase the variety of measures of skill gains for adult learners who participate in an Integrated Education and Training program. Yes, this is critical, but it is essential that the discussion go beyond this and examine the role of standardized testing as a gatekeeper throughout adult education programming.

First, many individuals entering adult education have mustered significant courage to return to school, sometimes after years and often past failures in education. They are returning to education with specific employment, career or postsecondary transition objectives. Yet for many, the first activity they experience in adult education is an inherently stressful and off-putting multi-hour, multi-day test that doesn't align with their goals. As a result, many hopeful individuals drop out during intake services. Adult education students often can only dedicate a few hours a week to class in the evenings and there is a great personal and family cost in prioritizing attendance in our classes. These students come in asking us to teach them; if we are required to spend the first 6 hours (often over several weeks) testing them instead of teaching them, then we are not valuing their time nor are we demonstrating an attentiveness to their immediate and pressing goals. If they don't feel that their time and goals are valued by our programs, then they will not continue coming.

Second, it is imperative that we think beyond standardized testing in order to assess student learning while students are enrolled in our programs. All our adult learners should be assessed based on multiple measures that include both performance-based measurement and formative assessments designed for the actual content students learn in contextualized settings. A focus on standardized testing may in fact hinder student progress by limiting their ability to demonstrate their learning and progress on to the jobs and careers for which they are truly prepared. Valuable class time must be directed to test taking strategies instead of content and skill mastery. The gate keeper to improved employment opportunities should not be the ability to pass a standardized test, but the ability to perform the contextualized tasks or to engage in and pass post-secondary coursework.

While the inclusion of alternate performance measures such as transcripts and knowledge-based exams is a commendable next step to measure student success, at minimum, I support extending this logic to include recognizing that the attainment of a high school diploma and/or its equivalent (including the National External Diploma

Program, Credit Diploma Programs, and approved standardized assessments such as the GED, HiSet and TASC), without requiring a post-test to show a functioning level gain. Additionally, mid-point benchmarking options that are not standardized need to be authorized and embraced.

For the current data reports in Table IV, participants are included in column F, “Number who attained a high school diploma or its equivalent,” only if they also demonstrate an educational functioning level gain (column E) on a posttest. Participants who attain a diploma or its equivalent but who don’t take the time to also take a posttest aren’t counted by the NRS as attaining diplomas through adult education. Therefore, the “Grand Total” in column F can be very inaccurate and not reflect all the achievement happening in a given state.

Example: The State of Connecticut Department of Education posts an annual Statewide Profile Report of adult education program statistics. The report for the 2018-19 school year (https://portal.ct.gov/-/media/SDE/Adult-Ed/Program-Profiles/Program-Profiles-2018-19/StatewideProfile_2019.pdf) shows that a total of 1690 adult ed learners achieved a diploma via one of the three programs offered in the state (page 3). Yet in the NRS AEFLA Reporting Table IV for the state, column F (<https://nrs.ed.gov/rt/ct/2018/table-4>) shows only 130 attained a diploma.

Recommendation: Table IV column F should count student participants who attain a high school diploma or is equivalent regardless of whether or not they have a post-test that demonstrates an EFL gain.

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. 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: 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 ~~IET~~ 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 defines 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.”