

September 20, 2020: Response to comments on Docket Number: ED-2020-SCC-0117

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

The Great Falls Career & College Readiness Center, located in Great Falls, Montana operates the AEFLA grant under the Great Falls Public School Umbrella and overseen by Montana Office of Public Instruction. Our program is located at the community college, Great Falls College Montana State University.

Being located in a rural area, our program covers five different districts separated and disbursed over 100 miles. Fifty percent of our participants come to us having already obtained a high school diploma or its equivalent. Yet, even with this initial credential, they are low skilled, hard to serve, lacking employability skills, low self-confidence, and wanting guidance on next step options. We are fortunate that under WIOA, assisting participants with transitions requires collaborations across multiple sectors.

The ICR states that the proposed changes are to be effective July 1, 2021, and required to be included in the annual performance reports due on October 1, 2021. We are concerned with the following:

- The timeline will not allow consistent reporting across states. Most states are not prepared to collect this data. While it is likely some states have begun collecting and reporting these measures, that is not predominantly the case. This sets a precedent for effecting a change retroactively; the data would need to be collected during the year prior to the effective date, a year which has already begun without the mechanisms or training for the data to be collected in many states.
- Additional time may be needed to secure or modify data sharing agreements with partner agencies. Time to obtain the required data, time to train providers in data collection, along with documentation criteria, as well as guidance specifics that will allow for consistent reporting across states. This will not only be a time burden but fiscal burden as many states are looking at major budget cuts.
- Time is needed to consider whether parallel changes would be needed on other tables.

Other considerations include:

- Expanding reporting on the MSG indicator to other types of programs for the purpose of transition to post-secondary education, training, or career advancement. The current NRS tables still maintain reporting specifics developed and implemented under WIA. By holding on to these archaic reporting practices, skewed reporting happens, stifled innovation in serving individuals most in need is rampant, and unnecessary costs are burdening local programs and states.
- Enrollment into post-secondary is a move in a positive direction. However, actual guidance on implementation is overly restrictive. By requiring a post-exit, not only is it in direct conflict with OCTAE Program Memorandum 17-2, it will not allow participants in the fourth quarter of the program year to be eligible. The word "exit" should be removed from the table descriptor and further allow states to report an EFL gain for participants who transition from an adult education and literacy activities program and enroll in credit or transcript-bearing postsecondary education or training during the program year.

- Transition within Integrated Education & Training is currently undermined by the NRS guidance. Adding verbiage to MSG 1(d) allowing an EFL gain for participants who transition from a program below the postsecondary level and dually enroll in a program below postsecondary level and a postsecondary education and training during the program year would be beneficial to all (especially participants). In addition, providing guidance to recognize that some “recognized postsecondary credential” types happen below the “college level” and are within the scope of WIOA Title II and other community based partners.
- Using EFL placement requirement by all participants restricts AEFLA’s ability to deliver various educational career advancement services highlighted under the new law. This requirement is from the WIA mentality and not in alignment with the purpose of working collaboratively with partners to streamline services. Not to mention the first time students access AEFLA programs, they are over tested which adds to their anxiety of why they either left or avoided education in the past. WIOA provides a wide variety of outcome measures for MSG, the NRS requires one method for entry-level assessment that may or may not have any relevance or alignment to the participant’s goal. Not to mention the undo cost for states and program. This practice limits programs, partnerships, and those participants who are hardest to serve. NRS testing simply does not fit all learners, it is an illogical requirement for state assessment policies, and it is time for an alternative to the EFL level taxonomy. Adding a 7<sup>th</sup> row for the “non-leveled” or “other” participants on Tables 1, 4, 4b, 4c for participants whose goal is to earn an MSG through a method other than post testing would be beneficial.
- Relook at guidance and reporting to allow digital literacy assessments for an MSG type 5 on Table 4 for programs to get credit for preparing participants with 21<sup>st</sup> century skill sets that are difficult to be measured by a standardized assessment and under the current NRS constraints of pre/post testing.
- Restructure the use of table 4 C Distance Ed to guide the field of adult education toward better solutions to possibly use as a way to evaluate who is equitably engaging in blended, remote, or distance learning using technology and what the role of technology use is playing across states and program.

The Great Falls Career & College Readiness Center would like to thank you for considering our thoughts and concerns within the public comment opportunity.

Submitted Respectfully,  
Great Falls Career & College Readiness Center Team