



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

JFF is pleased to provide comments to the US Department of Education (ED) Office of Career, Technical, and Adult Education (OCTAE) regarding the Information Collection Request (ICR or “the ICR”) for the Measures and Methods for the National Reporting System (NRS) for Adult Education (Docket Number: ED-2015-ICCD-0004).

Throughout the United States, a growing number of WIOA Adult Education and Family Literacy Act (AEFLA) funded providers and their employer partners are making great strides in creating economic opportunity for many thousands of learners and workers each year. Unfortunately, they are often doing so, despite challenges with the NRS.

Enhancing the NRS will help fully realize the sea change envisioned by Congress in the Workforce Innovation and Opportunity Act: a public education system that is a full partner to both employers and the workforce development system. What OCTAE measures gets implemented, and so it is critical that the NRS: incentivize employer-based education and training; remove legacy barriers that restrict access to services for those seeking advancement; and accurately record objective progress toward the most important performance indicators—rather than proxies that may create unnecessary barriers for participants.

We join others in calling for the following changes:

- **Table IV, Column A – Allow for alternative measures of eligibility.** On tables that arrange participants by EFL level, include an additional entry space for both ABE and ESL participants for whom eligibility is determined by means *other than a commercial NRS-approved test*. Allowing for alternatives to commercial testing can reduce the cost burden for providers, align their entry processes with other core WIOA programs, and reduce friction for employer partners who would often opt out of the system rather than tolerate time-consuming testing at program entry.
- **Table IV, Columns G and N – 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,** through the following edits. Revise Column G on Table 4 to read: “Number of ~~ET~~ 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 AEFLA activities for reporting: “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. Also, encourage and support the development of tests for inclusion in the NRS contextualized for specific occupations or occupational clusters. Updating this requirement would further support the diffusion of integrated education and

training (IET) models throughout the United States by allowing providers to account for essential activities that prepare workers for success *on the job* rather than on purely academic tests— thereby improving participants’ skills and leading to advancement and wage gains over time. This would further boost performance across several other key indicators, especially the *employment, earnings, and effectiveness in serving employers* WIOA indicators.

- **Table IV—Include more accurate measures of progress on secondary diploma or equivalency completion.** Subtests offered toward the completion of a secondary school diploma or its recognized equivalent, for example GED math or language arts tests, are administered under strict requirements by independent, often state approved test administrators. These tests are arguably more rigorous and objective than commercial NRS-approved tests which are often administered in less controlled environments. By adding a column to table IV that measures “the number of participants who attained one or more subtests leading to a secondary school diploma or its recognized equivalent,” OCTAE and the federal partners could ensure that the NRS more appropriately reflects the intent of Congress by measuring objective progress directly related to credential attainment.
- **Table IV, Column E, Bullet 5-- Better define exit and enroll transition in order to enable providers to report on preparation for college or training.** By excluding “exit” from the table descriptor, OCTAE would no longer require providers to end adult education services in the third quarter of the program year, when participants would most benefit from preparation for upcoming college or training programs that start predominantly in August. At the same time, this would also cut down on burdensome and unnecessary post-testing, which providers often employ in order to be certain they can demonstrate a Measurable Skill Gain.
- **Table IV, Column E, Bullet 5-- Disincentivize enrollment into solely developmental education.** By using this table descriptor to clarify that postsecondary education or training does not include enrollment in *only developmental education coursework*, the NRS would better reflect the intended rigor of the measure. Though developmental or remedial education does provide skill building for participants, these often represent lateral shifts and not vertical skill progression. More importantly, research has demonstrated that prerequisite developmental education sequences are associated with reduced likelihood of postsecondary attainment, squandered Pell eligibility, and increased risk of student debt¹.

We appreciate the opportunity to contribute our perspective through this ICR, and look forward to OCTAE’s continued efforts to make the NRS accountability framework more flexible, equitable and responsive to the needs of our colleagues and neighbors.

¹ Complete College America; Education Commission of the States; Jobs for the Future; University of Texas, Charles A. Dana Center. (2012). Core Principles for Transforming Remedial Education: A Joint Statement. Available at <https://eric.ed.gov/?id=ED539870>