



**NASDAE**  
National Association of State  
Directors of Adult Education

## Response to Information Collection Request for Comments: Measures and Methods for the National Reporting System for Adult Education

Docket ED-2020-SCC-0117

The National Association of State Directors of Adult Education appreciates the opportunity to submit comments on the proposed changes to the NRS. We agree that the proposed Table 99 would ensure more accurate reporting on Statewide Performance Reports and that the burden to implement this new table is negligible. NASDAE thanks OCTAE for recognizing the need to allow additional skills gains for participants. State Directors, however, have the following concerns regarding the proposed changes to Table 4:

Timeline: 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.

- 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.
- The timeline will not allow consistent reporting across states. Most states are not prepared to collect this data. While it is evident that some states have begun collecting and reporting these measures, that is not universally the case and states that are currently able to collect the required data for column G on Table 4 appear to be in a minority, according the newly-available state data tables in nrs.ed.gov.
- Many data systems are not calibrated to collect, calculate the most recent MSG, and report the required data and would need further development.
- Additional time may be needed to secure or modify data sharing agreements with partner agencies to obtain the required data.
- Time is needed to train local program providers who will be responsible for the collection and proper entry of the data.
- Time is needed to consider whether parallel changes would be needed on other tables, such as Table 4C, which reports outcomes for distance education students. Given the number of providers offering online instruction, we very well may see IET students reported as distance education students.

Training Need: The timeline does not afford states time to receive necessary additional guidance from OCTAE on the new data requirements.

- Training is needed on clarification of what constitutes the documentation and use cases of the newly-proposed MSGs. Without additional guidance, consistent reporting across states is unlikely to be implemented.

- States need training from OCTAE so that they can instruct local program providers and thus ensure consistent data collection and entry.

Burden of Collection of Data: The supporting statement for this ICR indicates that there will be no additional burden created by collection of the data for states. State directors disagree that that is the case for the changes proposed.

- Many states will need to reprogram data systems to accommodate the new data entry as well as the algorithms to determine the most current MSG, involving time and effort.
- There will be monetary and time burden to train providers who must collect and enter the data.
- There will be a burden of additional administrative time to secure or modify data-sharing agreements with partner agencies to obtain data validations.

NASDAE would also like to encourage OCTAE to reconsider another issue related to MSGs and IET design:

IETs, by definition, are a concurrent education and training program. Many programs are coordinated with postsecondary education and training institutions as the training provider. Currently, the MSG that recognizes transition to postsecondary education is not available by definition to be awarded to IET students who are coenrolled through such a program. We find this to be a disincentive to our efforts to offer concurrent education and training, assist students to reach their goals more efficiently, and reach state-negotiated performance targets. Redefining how the transition to postsecondary gain is awarded would be an incentive and facilitator for providers to offer IET programs that accelerate students' achievement of postsecondary enrollment and credentials.

NASDAE would also like to encourage OCTAE to consider reporting all High School Diplomas and recognized equivalents that are awarded to AEFLA participants:

This metric is by far the most requested data element by various funders, stakeholders and partners and yet we do not have an official count, as these important credentials are not uniquely reported in the NRS.