

Comments from Anson Green
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Described herein are comments and recommendations to the U.S. Department of Education (ED) Office of Career, Technical, and Adult Education (OCTAE) from World Education Services regarding the Information Collection Request (ICR or “the ICR”) the Measures and Methods for the National Reporting System (NRS) for Adult Education (Docket Number: ED-2020-SCC-0117).

Background

I am a lifelong adult educator whose passion is deploying innovative service models for low and middle skilled workers to support their life ambitions. My experience brings a deep and varied portfolio of accomplishments in adult and developmental education and workforce development. Currently, I’m developing a workforce development and credentialing system for front-line team members at Tyson Foods. The approach will measure the skills and competencies gained in adult education programs and prepare team members for upskilling opportunities to fill essential job openings.

Prior to Tyson Foods, I led the transformation of the over \$80M Texas federal Adult Education program at the Texas Workforce Commission into a solution for Texans seeking responsive education and training services to meet their college and career aspirations. While there, I sat on the National Reporting System (NRS) Technical Workgroup for six years and led multiple adult education performance accountability for Texas.

Introduction

The Workforce Innovation and Opportunity Act (WIOA) was intended to deliver amplified value and results for job seekers, current workers and employers. All-together, the following recommendations will enhance adult education performance reporting and support Congress’s aspiration that adult education and workforce development programs under WIOA be responsiveness to employers and adults, including immigrants and refugees.

I believe admirable progress has been made regarding workforce training and supports designed to address the career ambitions of English language learners (ELL) under WIOA, but there is still work to be done.

These recommendations for performance reporting under the NRS are intended to support changes that will reduce impediments consistently voiced by our state and local adult education partners related to accomplishing increased workforce development outcomes for English language learners, especially internationally trained professionals.

Recommendations for Reporting Related to Internationally Trained Professionals

While US Department of Education (ED) has implemented required WIOA activities and regulations and provided commensurate technical assistance over the last six years, further enhancements are needed in reporting that will support the NRS’s ability to tell the full story—through data— of the diverse accomplishments local adult education programs are delivering for immigrants and refugees.

¹ The attached comments did not make into the copy of recommendations I submitted on behalf of Tyson Foods.

ELLs who are skilled with credentials and degrees from their home country are perhaps the workforce most left behind by public workforce and adult education systems. Though specifically called out in the WIOA definition for the Integrated English Literacy and Civics Education program, there has been no strategy from U.S. Department of Education to provide guidance nor technical assistance for this population.

These participants are pervasive in ESL classrooms across the county, but their education, training and employment needs are unique. They have a strong foundation for learning, positive professional accomplishments, and demonstrated employment histories. Their trajectory in adult education is often very different from that of the learners they share a class with. Enhancements to the NRS would help accommodate better the performance of these individuals through education, training, and employment in adult education.

Comment 1

This recommendation supports proposed changes in the ICR to Table 4 for IET and recommends the following additional changes to the Table 4.

Internationally Trained Professionals often participate in English as a second language (ESL) to build the English literacy needed to enter college or university classes and recalibrate their professional training from their home county to meet U.S. credential and employment requirements.

As such, their needs are much less focused on progressing on commercial NRS-approved tests and more related to passing tests like the Test of English as a Foreign Language (TOEFL) and entering courses like NCLEX-RN preparations for nursing.

Because they already have advanced degrees, it is rare for them to need or desire integrated education and training (IET) or Integrated English Literacy and Civics Education (IELCE) programs, which are designed for participants with no or little technical skills.

Recommendation 1: *Revise intake, eligibility, and pretesting in the NRS to augment required testing on NRS-approved tests and allow intake and reporting for internationally trained professionals who are found eligible for services through other assessments.*

The recommendation retains familiar and effective reporting structures for most students but opens opportunities for more accurate reporting internationally trained professionals.

Include on Table 4, column A an additional row for individuals for whom eligibility is determined by means other than an NRS test. Placing a category on row A of table labeled “Other Assessment” or another label, would maintain consistency for the vast majority of students who use commercial NRS-approved tests, but open access and accurate reporting internationally trained professionals who are deemed eligible through other assessments methods.

This modest revision will also create a more durable reporting system and allow reporting for internationally trained professionals, who are now poorly accounted for in reporting.

Comment 2

Internationally Trained Professionals often take paths to reemployment or upskilling unique from other ELLs. Because they have advanced degrees or training, they often are not in need of entry-level

workforce training and often have more customized programs of study such as preparation for employment specific tests or specific industry recognized credentials to certify their skills in the U.S.

Additionally, internationally trained professionals may already be working for an employer who desires to promote them, but they need contextualized English skills and additional credentials. For example, it is not uncommon for internationally trained teachers to be working in non-teaching capacities in public schools because they love working with children. Similarly, healthcare professionals from other countries gravitate to non-patient care positions in hospitals. With additional skills and certifications, the school can hire a new bilingual teacher and the hospital promote a bilingual healthcare professional who is bilingual and culturally competent in other healthcare customs.

Recommendation 2. *Expand reporting parameters on Table 4 to allow Title II providers to report not only IET activities using all MSG indicator types but also programs common for internationally trained professionals including Workplace Literacy, Integrated English Literacy and Civics Education (IELCE), and Workforce Preparation Activities.*

Expanded reporting through these activities will better document the academic, technical, occupational, or other forms of progress gained under these activities.

Conclusion

I believe the proposed expanded reporting capability will greatly increase the reporting of internationally trained professionals in the NRS and better reflect performance of the customized programs of study these workers partake in through adult education providers.