



National Coalition For Literacy

21 September 2020

Director, Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave SW, LBJ, Room 6W208D
Washington, DC 20202–8240

Re: Docket No. ED–2020–SCC–0117

Comment Request: Measures and Methods for the National Reporting System for Adult Education

Dear Director:

The National Coalition for Literacy (NCL) appreciates the opportunity to provide comments to the U.S. Department of Education’s Office of Career, Technical, and Adult Education (OCTAE) regarding the Measures and Methods for the National Reporting System for Adult Education (NRS). NCL is an alliance of the leading national and regional organizations dedicated to advancing adult education, family literacy, and English language acquisition in the United States. By serving as an authoritative resource on national adult education issues, NCL increases public awareness of the value of programs that provide education in these areas and promotes effective public policy. NCL envisions a nation in which all adults are able to fulfill their potential and meet their goals through access to high quality adult education and literacy services provided by an integrated and well-developed system. The NRS contributes in key ways to the nation’s ability to achieve that vision and thus is of central concern to NCL.

The materials provided by OCTAE in conjunction with the comment request propose two changes to the existing NRS reporting requirements: the addition of two new columns in Table 4 (Measurable Skill Gains by Entry Level), with accompanying instructions, and the introduction of a new Table 99 (Indicator Denominators for Statewide Performance Report). In responding to the comment request, NCL will address the relationship between the data collected by the NRS and the performance accountability requirements of AEFLA with reference to the environment in which adult education and family literacy programs currently operate and the reasons for which adult learners participate in them. NCL’s comments will focus first on the proposed changes to Table 4 and then on some related concerns, with particular reference to OCTAE’s question 1 (Is this collection necessary to the proper functions of the Department?)

and question 4 (How might the Department enhance the quality, utility, and clarity of the information to be collected?).

NCL's overall objective is to offer observations and recommendations that support OCTAE in ensuring that the NRS does the following:

- Allows states and programs to demonstrate that they meet the performance accountability requirements of the Adult Education and Family Literacy Act (AEFLA), Title II of the Workforce Innovation and Opportunity Act (WIOA);
- Allows and encourages states and programs to provide data that presents a full picture of how programs are responding to the WIOA mandate to provide the skills and competencies that employers seek, as well as those that postsecondary education requires;
- Uses data collection and reporting proactively to provide leadership and support for the field by encouraging programs to develop and offer programming that responds to employer needs and postsecondary requirements as these relate to adult learners' goals.

Point 1. Revise reporting requirements for Integrated Education and Training (with reference to the revised Table 4)

The proposed addition of columns G and N in Table 4 and the associated notes on page 9 expands the reporting requirements for Integrated Education and Training (IET) by asking programs to report measurable skill gains (MSGs) other than educational functioning level (EFL) gains and secondary school diplomas or equivalents for IET participants.

That is, these columns allow reporting of MSGs of Types 3, 4, and 5 (WIOA, 2014):

- *Type 3.* Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit's academic standards
- *Type 4.* Satisfactory or better progress report towards established milestones, such as completion of on the job training (OJT) or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training
- *Type 5.* Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams

Reporting gains of these three types is highly appropriate for IET programs, which, as defined in both the WIOA legislation and AEFLA regulation, must support adult education and workforce preparation concurrently and contextually with career and technical education. Outcomes of this dual enrollment strategy for adults are not fully represented through reporting of EFL gains and achievement of high school diploma or equivalent (MSG Types 1 and 2) because of the job training, occupational skills development, and postsecondary objectives that participation in an

IET program typically entails. NCL therefore maintains that collection of data on MSGs of types 3, 4, and 5 is necessary to OCTAE's ability to fulfill its "proper functions" with respect to AEFLA.

The addition of Columns G and N to Table 4 allows this table to report MSGs of Types 3, 4, and 5 in relation to IET participants' entering EFLs, a relationship that is not included in the detailed IET reporting on Table 11. Requiring reporting on these outcomes in relation to entering EFLs may be one way to encourage the inclusion of learners at all levels in IET programs and show to what degree learners at each level achieve the different types of gains. This approach would focus IET program reporting on overall outcomes for IET participants, and could encourage programs to design and implement IET models that combine adult education's expertise in foundational skill building with high quality workforce training, thus furthering achievement of the overall goals of the WIOA legislation.

NCL therefore supports the proposed addition of Columns G and N to Table 4. NCL also notes the absence of any meaningful crosswalk between the EFL descriptors and ways of measuring Type 3, Type 4, or Type 5 gains. This absence means that the implications of the data (what it says about the relationship between skill levels as indicated by EFLs and ability to accumulate secondary or postsecondary credit hours, reach employer milestones, or pass an occupational exam) are not clear. NCL therefore suggests that OCTAE consider underwriting exploratory studies that could support the development of guidelines and rubrics for the creation of crosswalks that can clarify the implications of this data for program design and instruction.

Point 2. Include the reporting parameters specified in statute for all types of adult education programming

The inclusion of reporting on MSG Types 3, 4, and 5 for IET programs (point 1 above) leads to exploration of the need to provide a similar allowance for all types of adult education programming.

Currently, Table 4 restricts outcome reporting to MSG Types 1 (column E) and 2 (column F), defined as follows (WIOA, 2014):

- *Type 1.* Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level
 - (a) States may compare the participant's initial educational functioning level, as measured by a pre-test, with the participant's educational functioning level, as measured by a post-test;
 - (b) States that offer adult high school programs that lead to a secondary school diploma or its recognized equivalent may measure and report educational gain through the awarding of credits or Carnegie units; or
 - (c) States may report an educational functioning level gain for participants who exit a program below the postsecondary level and enroll in postsecondary education and training during the program year. A program below the postsecondary level applies to participants enrolled in a basic education program.

- *Type 2.* Documented attainment of a secondary school diploma or its recognized equivalent

Tables 4A and 4B reinforce the emphasis on Type 1 MSGs by requiring data on EFL gain as reflected in post-testing and EFL gain in relation to attendance hours.

This NRS emphasis on reporting educational gain is carried over from the reporting requirements that applied under the predecessor legislation, the Workforce Investment Act (WIA). It reflects the weight that the WIOA legislation, in alignment with WIA, placed on the provision of literacy, numeracy, and English language skills development as integral to the law's intent. This emphasis is summarized on page 7 of the Statement of the Managers (HELP Committee, 2014):

In reauthorizing title II ... the bill places an emphasis on ensuring States and local providers offer basic skills, adult education, literacy activities, and English language acquisition concurrently or integrated with occupational skills training to accelerate attainment of secondary school diplomas and postsecondary credentials. ***Making sure these skills are solidly in place for all students is a priority.*** (emphasis added)

NCL recognizes and values the emphasis that the NRS places on reporting educational achievement, as reflected in the structure of Table 4. This emphasis aligns NRS reporting with the intent of the AEFLA reauthorization, as summarized in the above quote from the Statement of the Managers.

However, the exclusion of a format for reporting outcomes for MSG types 3, 4, and 5 imposes limitations that stand in direct contradiction to both the larger mandates of the WIOA legislation and the actual outcomes that current AEFLA programs are able to achieve and document. In addition to gathering data on MSG Types 1 and 2, the NRS needs to provide a way for all AEFLA programs to report outcomes in relation to MSG Types 3, 4, and 5 for other allowable workforce-oriented activities, including workplace literacy, integrated English literacy and civics education (IELCE), and workforce preparation. Subpoints 2a and 2b will illustrate this point.

2a. Mandates of the WIOA legislation

In addressing performance accountability under Title II (AEFLA), Section 212 states that, "Programs and activities authorized in this title are subject to the performance accountability provisions described in section 116." Section 116 establishes "performance accountability measures that apply across the core programs to assess effectiveness ... in achieving positive outcomes for individuals served by those programs" (WIOA, 2014).

The Statement of the Managers on WIOA provides detail on this point: "The bill requires all adult basic education and literacy programs to use the same set of primary indicators of performance accountability outlined for all employment and training activities authorized under this Act. Individuals receiving these services should be able to use these skills in obtaining

a regular secondary school diploma or its recognized equivalent, obtaining full time employment, increasing their median earnings, and enrolling in postsecondary training, or earning a recognized postsecondary credential” (HELP Committee, 2014, pages 7-8).

In the rulemaking process for WIOA, section 462.41 was modified to “support the orderly transition from WIA to WIOA § 462.41” and “conform to the joint WIOA rule to implement the measurable skill gains performance indicator by requiring the documentation of achievement of **academic, technical, occupational, or other forms of progress**” (emphasis added) in order to provide States and local programs “more flexibility in reporting outcomes for adult learners.” These modifications aimed to “strengthen the integrity of the NRS as a critical tool for measuring State performance on accountability measures related to adult education and literacy activities under AEFLA, as required under section 116 of WIOA.”

The statute, the Statement of the Managers, and the resulting regulations thus are clear in promoting an expansive approach to performance accountability for AEFLA programs that includes types of progress beyond the academic—that is, beyond the first two types of measurable skill gains. While the regulations (Section 462.41) identify testing to measure academic performance as falling under the purview of the NRS, they also make a clear distinction between academic and workforce performance indicators such that “**test administration** would be used to document the educational or academic progress domains under the MSG indicator” for adult education programs, but that “**technical, occupational, or other forms of progress**” still apply to AEFLA (emphasis added). To align with the intent of the legislation, then, the NRS needs to collect data on outcomes for all five types of MSGs. Such collection is “necessary to the proper functions of the Department.”

2b. Documenting all achievable and relevant outcomes

The Type 1 and Type 2 MSGs represent the goals and outcomes of only a limited portion of the adults who participate in ABE/ESL instruction. For adults whose objective is to become better equipped to obtain and retain employment in a changing workplace environment, increased competence in reading, writing, mathematics, and English language proficiency is essential but is not the only form of measurable, documentable growth. By restricting reporting to the first two MSG types, the NRS as currently constituted does not adequately capture what program participants are achieving or what programs know about their adult learners.

By limiting the data collected to two of the five MSG types (Table 4), and by requiring detailed attention to EFL level gain and attendance hours (Tables 4A and 4B), the current reporting structure obscures successful models and conceals the achievements that employers find meaningful and that participants recognize as central to their development of in-demand skills that increase their employability. Expanding reporting for workplace literacy through measures such as *progress reports towards established milestones from an employer* (MSG Type 4) or *passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks* (MSG Type 5) would greatly increase the options that adult education providers could use to achieve the outcomes

that employers desire. Such expanded reporting would also enable the NRS to fully determine the degree to which programs are “achieving positive outcomes for individuals” that they serve.

NCL recommends that OCTAE view the preparation of all adult education participants as similar in that progress can be documented and outcomes reported in relation to different MSG types depending on the participant’s goals and the nature of the program model. NCL therefore suggests that OCTAE do the following with respect to Table 4:

- Continue to require discrete reporting on EFL gains (MSG Type 1) and attainment of a secondary school diploma or recognized equivalent (MSG Type 2) on Table 4;
- Provide columns for reporting progress in relation to postsecondary study (MSG Type 3), employer milestones (MSG Type 4), and technical/occupational skills benchmarks (MSG Type 5) for program types other than IET on Table 4, in addition to the IET reporting in proposed Columns G and N;
- To add columns for the additional MSG types without making Table 4 completely unwieldy, divide the table into two parts, with first period of participation in part 1 and all periods of participation in part 2.

Point 3. Expand reporting to include all high school equivalency outcomes within a reporting period

The third note to Table 4 (page 9) specifies reporting only the most recent MSG within the reporting period. In particular, for a high school diploma or recognized equivalent to be reported in Table 4 Column F, that achievement must be the most recent MSG for the participant. If the participant achieves any other MSG, such as an EFL gain or an industry-recognized credential within an IET program, after HSE completion, that MSG supersedes the high school equivalency and the HSE cannot be counted in the total in Column F.

This way of reporting high school equivalency outcomes is problematic for three reasons:

- It limits the provider’s ability to see how many HSEs its participants have achieved during the reporting period;
- It presents misleading information to stakeholders outside the NRS who may not have full understanding of how data is reported in the NRS tables;
- It fails to meet the needs of state stakeholders, who use HSE completion rates as a key metric when evaluating the effectiveness of adult education programming.

NCL therefore suggests that OCTAE provide a way for programs to report the outcomes that are of importance to stakeholders such as employers and policy makers more directly. One possibility would be a summary table that lists overall totals for each type of MSG: trade-related benchmarks, employer milestones, secondary/postsecondary credit hours, high school equivalency, EFL increase. The table would list outcome numbers only, rather than outcomes by entering EFL, to keep the focus on results rather than on untenable and irrelevant comparisons.

Point 4. Allow for relevant and realistic reporting on the use of technology in adult education

The NRS reporting tables include Table 4C, Measurable Skill Gains by Entry Level for Participants in Distance Education. While this table recognizes that digital tools can play important roles in adult education, it does so in a way that fails to reflect how those roles have evolved over time and what they currently are.

Table 4C was designed at a time when distance education was an innovation that was distinct from traditional in-person instruction; the table served to indicate how distance education outcomes compared with those of face-to-face instruction. The distinction between these two methods of delivery is no longer relevant, however. The majority of adult education programs now use blended models in which technology provides learning experiences that are shared by learners in varied locations through the use of learning management systems, online materials that accompany textbooks, gamification apps such as Kahoot! and Quizzizz, and platforms such as YouTube and TED Talks. The value of blended models has become apparent, and the impetus to adopt them has strengthened, in the context of the COVID-19 pandemic and the resultant closure of physical facilities. Given the ongoing need for deep cleaning of school and other buildings during the evening hours when adult classes are typically held, and the usefulness of technology in overcoming transportation and other barriers to participation, adult education's turn toward technology is well on the way to becoming permanent. The field has moved from technology-enhanced instruction to technology-enabled instruction.

The fact that "distance education" has become a misnomer for current practice in adult education does not mean that Table 4C should be discarded, however. Instead, it could be redesigned to allow for reporting on digital literacy, a critical competency necessary for adults to obtain employment, support their children in school, and gain economic self-sufficiency (Bergson-Shilcock, 2020). As a critical competency for adult functioning, digital literacy is aligned with the purposes of AEFLA, but it is not measured in any way by the NRS. NCL suggests that OCTAE develop a set of competencies and related outcomes for digital literacy, and redesign Table 4C as a reporting vehicle for those. This would "enhance the quality, utility, and clarity of the information to be collected," as digital literacy is not only a critical competency but also an outcome that is meaningful to employers, postsecondary institutions, and other stakeholders.

The National Coalition for Literacy hopes that these comments and suggestions will be helpful as OCTAE seeks to improve the NRS reporting tables. NCL looks forward to continuing its productive relationship with OCTAE in support of a robust and effective system of adult education and family literacy.

Cordially,

Deborah Kennedy
President

References

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