



Literacy Council of Northern Virginia

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

The Literacy Council of Northern Virginia (LCNV) appreciates the opportunity to submit comments to the US Department of Education (ED) Office of Career, Technical, and Adult Education (Docket Number: ED–2020–SCC–0117) regarding “Measures and Methods for the National Reporting System for Adult Education.” LCNV receives an IELCE grant from the State of Virginia under WIOA.

LCNV agrees with comments submitted to ED by World Education, Inc. (WEI), COABE, and the National Skills Coalition. The comments we submit here seek to explicate within the context of our own experience some of the points made by those organizations.

About Us. LCNV is a 59-year old community-based literacy organization serving about 1500 adult immigrants with low literacy skills, 250 of whom fall under our IELCE grant program. Our students come from 90 countries and speak 50 different languages. Half live below the federal poverty level and about 45% are unemployed.

Scope of Data Entry and Storage. Because our numerous funders have varying data requirements and we ourselves need additional data to guide strategic planning and decision-making, we collect a large array of data housed in a customized Higher Education Data Architecture (HEDA) Salesforce database; and employ a specialist to administer it. Thus, when we enter data into the State of Virginia NRS database, we enter it a second time into Salesforce.

Scope of Testing at LCNV. In order to meet the requirements of the IELCE grant program, we employ NRS-approved standardized tests—predominantly the Best Plus 2.0, but also the CASAS Life and Work Reading test—in a pre- and post-test model. However, the use of Best Plus 2.0, an individually administered test that works best for our population, is expensive in terms of dollar cost and human resources. In addition, it does not meet all of our programmatic needs. We use criterion-referenced tests to ascertain if our students actually learn what is taught in their courses and if they are ready to advance to the next instructional level. We administer the exam for the Guest Service Gold credential from the American Hotel and Lodging Institute at the end of our IET courses. We utilize teacher rating scales to shed light on whether students meet important life goals such as citizenship attainment. And, we ask students to complete employment surveys at the end of each session to learn about changes in their employment status while they are with us.

IELCE Program Fit with Business Community. LCNV prides itself on having developed Destination Workforce® (DW) in 2014, a program division with the express purpose of offering English language learners a fast track to a job or to workforce advancement through contextualized English instruction. Since its inception, we have partnered with a number of businesses (including Capital One, Double Tree Hilton, and Think Food Group) to upskill their immigrant workers with low literacy skills onsite. In addition, we have offered campus-based courses to unemployed adults seeking a job. When WIOA

funding became available, we believed that conceptually, our DWF program was a natural fit for the IELCE grant, and we placed DW students under its auspices.

We learned, however, that business partners' needs and requirements differed from those of the grant. First, businesses required relatively short interventions designed to teach the skills their employees needed on the job. They also wanted assessments that aligned with those skills. But to comply with the grant, we would need to offer longer courses so that employees would qualify to take a post-test with the required instructional hours. And, we would need to administer standardized tests that did not in fact align with course content. Attempts to work with businesses under IELCE model could not reconcile these differences and we had to move those courses out from under the IELCE umbrella.

IELCE Program Fit with the Population. As mentioned above, one of the issues we encountered through our business partnerships—the need for shorter more targeted courses— also emerged indirectly in the courses we offered on our own campuses. Essentially, although we furnished courses with more than the required number of hours to take the standardized posttest (to allow for absenteeism), many students opted to leave early and thus didn't take the posttest. Some left because they found jobs, others left due to pressing family issues or illness. Essentially these students, for their own reasons, agreed that the courses were too long. Such life situations are prevalent with this population.

More on Course Hours. Because publishers of NRS-approved standardized tests essentially determine the number of hours needed to take their posttests (and thereby influence course duration), and since so many students fail to acquire the requisite number of hours to take the posttest, it is worth looking deeper to see if so many instructional hours are actually needed to succeed on those tests in a meaningful way. It was in that spirit that we looked at the Best Plus 2.0 Technical Report issued by the Center for Applied Linguistics (CAL) in January 2015 (<https://www.cal.org/aea/pdfs/BP2.0-Technical-Report.pdf>). (See section 4.7 Relationship to Instructional Hours under Chapter 4 Validity.)

Essentially CAL compared the performance of learner groups based on the amount of instruction received. We focused on the group receiving 40–59 hours of instruction as compared to the group receiving 60 to 79 hours of instruction. As reflected in Table 21, learner performance was equally strong in both groups when looking at NRS EFL gains, with 77 % of each group attaining a level gain. Table 22 shows that the two groups varied by only two percentage points when examining meaningful score gains, with 86% versus 84% attaining a meaningful score gain.

If we are correct in our interpretation of these data, we would respectfully ask that the NRS consider authorizing 40 instructional hours for the Best Plus 2.0, as it would allow programs like our own to posttest many more students. It would also erase the discrepancy between the hours required for the Best Plus 2.0 posttest as compared to the CASAS Life and Work Reading posttest, which would appear to differentially impact agency posttest rate based on test selection. The report would appear to contain ample justification to advocate for a change in NRS policy to allow students to take the Best Plus 2.0 posttest after 40 hours of instruction in lieu of the currently prescribed 60 hours.

We would also greatly appreciate a review of the requirement under longevity of scores where the Best Plus 2.0 is the only test with scores that do not remain valid for two years after a 90-day absence. Again, this leaves organizations with even greater costs and could be better understood.

Calculation of Pre–Posttest Gain. Before leaving the topic of testing students, we would like to ask about the reasoning behind one of the calculations that reflects on program success. In calculating the percentage of students achieving a gain, we fully understand the numerator as it represents the number of students who make a gain on the posttest. It would seem that the denominator should equal the number of individuals taking the test. But in one of the calculations, the denominator includes students who do not have a posttest and may have dropped out after as few as 12 hours of instruction. Does it make sense to judge programs accordingly? Isn't it possible that what we are seeing is the phenomenon of students dropping out early by necessity and not a failure on the part of programs?

Other Needs. In our field, it would help students tremendously if there were a category for distance education that did not require any face-to-face contact. Funding for interpreters to help gather information over the phone would be an important component of giving up this face-to-face contact, as well as a waiver from the standardized pre- and post-testing. There are few other educational settings that come to mind, outside of research studies, where pre-tests are required.

We also note that the standardized pre-test restricts access to our courses. Sometimes we have to administer two different pretests (Best Plus 2.0 and CASAS) because one will allow access while the other will not. This is prohibitively expensive. As recommended by others, we too agree that there is a need for an approved digital literacy assessment.

Given that so many individuals face seemingly insurmountable barriers to the workforce or furthering their education, especially during the pandemic, this may be the opportune time for practitioners and policy-makers to join together to generate ideas for flexible and innovative models that might better help us fully realize the goals under WIOA and help the most vulnerable among us.

Thank you for the opportunity to comment on the NRS.

Sincerely,

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Senior Fellow