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Pima County Community College District

September 21, 2020

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

We are writing on behalf of The Pima Community College Adult Basic Education for College and Career Program (PCC ABECC) to provide comments to the US Department of Education (ED) Office of Career, Technical, and Adult Education (OCTAE) regarding the Measures and Methods for the National Reporting System (NRS) for Adult Education (Docket Number: ED-2020-SCC-0117).

PCC ABECC is a part of the Arizona Adult Education system and serves about 2,500 annually in Tucson, AZ. As a leader in AZ Adult Education and the implementation of Integrated Education Training programs, PCC ABECC hopes to more accurately report student achievement and outcomes as they pertain to WIOA and align to Core partner work.

This ICR presents an exceptional opportunity for ED to further or complete enhancements to the accountability framework for adult education and literacy under WIOA. Comments and recommendations within this response provide for revisions to the NRS and support full implementation of the performance accountability under WIOA and express broader concerns about other elements of the NRS and the reporting system in general.

Pima Community College Adult Basic Education for College and Career Program looks forward to continued participation in the important work related to accountability under WIOA.

Recommendation #1: On Table 4, allow Title II the ability to report all types of Measurable Skills Gains, in alignment with the other core WIOA titles

Retain the proposed expansion of reporting for integrated education and training described in the IRC AND expand reporting on Table 4 to include reporting across all types of measurable skills gains as described in the joint guidance [OCTAE Memorandum 17.2](#) / DOL Labor Training and Employment Guidance Letter 10-16 for workplace adult education and literacy activities and workforce preparation activities.

The impact of the NRS requirement that all eligible participants under AEFLA be tested is restrictive and is a cost burden on states due to the required purchase of commercial tests available from only a limited number of vendors. Standardized assessments are time-intensive and do not directly align to the participants goals or program activities under WIOA. In addition, we are concerned about equity-related problems of standardized assessments and over-testing of students. When progress is measured by just one high-stakes test, true skill gain of individual learners cannot be shown to participants, funders, WIOA Core partners, or Congress. Furthermore, it discourages innovation and partnerships where contextualized assessment is more appropriate. This requirement also has a narrowing effect on the scope of services local providers and states implement.

Report participants by age categories to allow for reporting all types of MSGs;

- Remove Table 1 and collect participant age and ethnicity data on Table 2
- Replace EFL level data on Table 4 with age categories similar to Table 2.
- Modify Table 4b to include a column for all pre-tested students. Report pre-test EFL level data on Table 4B only for participants who will be measured by pre-test/post-test.

Or consider a minor change to table 4 to allow for reporting all types of MSGs;

- Add a 7th row for “Non-leveled” or “Other Participants” on Tables 1, 4, 4b, 4c for participants whose goal is earn an MSG through a method other than post-testing.

Recommendation# 2: Eliminate the use of July-June timeframe for reporting and remove Periods of Participation (POPs)

Students enter Title II programs at any time during the year. Having exit measures that can correlate to MSGs but must be achieved after 90 days of no service excludes participants in the fourth quarter of the program year since exit is required and the measure must be accomplished in the program year that ends June 30. Likewise, programming that co-enrolls or collaborates with colleges, training programs or employers may need to span the reporting timeframe, and thus, students enrolled in those classes or programs will count against program performance when measured on June 30. This complicates partnerships and/or creates a need for programs to pre- and post-test students on accelerated timelines just to get an assessment by June 30. More flexible reporting periods would better account for student outcomes.

The true functionality of Periods of Participation (PoPs) is unclear. In reality, students may need to step out and back into Adult Education programming throughout a fiscal year. PoPs are not a true indicator of student persistence and fail to accurately reflect the progress a student may make in a fiscal year with separate periods of participation. Table 4 attempts to capture data from all PoPs yet Table 4B only looks at the first PoP, which adds to confusion in interpreting outcomes.

Recommend the elimination of:

- “After exit” requirement for successful completion of outcomes; and
- Tracking of Periods of Participation (PoPs)

Recommendation #3: On Table 4, expand guidance to allow reporting of all postsecondary work during and beyond time in Title II

- Remove “exit” from the table descriptor and clarify that transition to postsecondary education or training is transcriptable even if concurrent with Title II
- Clarification of postsecondary vs. college level: Recognize that some recognized postsecondary credential types are within the purview of WIOA title II and other community based partners. Clarify that a recognized postsecondary credential includes a range of credentials, some at college-level and many not at college-level per shared guidance in https://wdr.doleta.gov/directives/attach/TEN/TEN_25-19.pdf (Apprenticeship)

Recommendation #4: Permit reporting of all High School Equivalency diplomas.

As currently formatted, the federal tables do not help programs or states to track the total number of High School Equivalency diplomas (HSED) each year. Yet, this is the data point that is most requested by local and state stakeholders when evaluating the effectiveness of adult education programming.

Table 4 recommendations:

- Capture ALL HSEDs in the columns on Table 4; AND/OR
- Create a Table 4d which captures all HSEDs and disaggregates HSED totals by type, e.g., GED; TASC, competency based; etc.

Table 5 Recommendation:

- Revise guidance on Table 5 to remove “9th grade equivalent or higher” language as it has no consistent meaning in federal reporting. Expanding to all levels will better capture the real impact of Adult Ed programming.

Recommendation #5: Expand gender and race categories for self-reporting

In the current context, requiring students to choose from a limited and outdated list for self-identification around gender and race risks losing participant engagement. It creates the potential for students to feel unrepresented and unsafe. Allowing for optional self-reporting of gender identity and race shows inclusivity and respect for all participants.

- Eliminate required self-reporting as male or female
- Expand options available for self-reporting of Gender Identity, and/or make self-reporting optional, not required
- Expand options available for self-reporting of Race, and/or make self-reporting optional, not required

Recommendation #6: Eliminate Table 4C for Distance Learning

Table 4C began as a place to gauge and evaluate learner outcomes in distance learning, for students whose distance learning hours accounted for more than 50% of their attendance hours. Today, Adult Education systems around the country have implemented both distance learning and blended learning to provide flexible access to students. Adult Education systems need to collect data that evaluates all student engagement through the various means of student participation, distance learning, blending learning, and face-to-face learning. Table 4C can be eliminated, as it is no longer relevant

Thank you for the opportunity to comment on OCTAE’s proposed reporting revisions for Adult Education under the National Reporting System. While our comments are broader than the current proposed revisions, we believe they bring to light complications in being able to fully report on the work that Adult Education programs and students are accomplishing in the field in partnership with WIOA Core Partners and in the true spirit of WIOA. Thank you for considering our recommendations.

Sincerely,

On behalf of the Adult Basic Education for College & Career leadership

Laurie Kierstead-Joseph

Acting Vice President, Adult Basic Education for College & Career
Pima Community College