

September 21, 2020

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

Re: Docket Number: ED-2015-ICCD-0004

Dear Director,

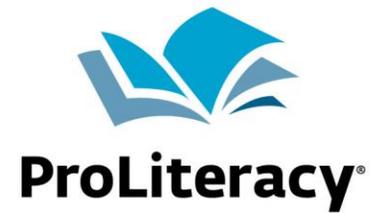
ProLiteracy is pleased to submit comments to the U.S. Department of Education’s Office of Career, Technical, and Adult Education (OCTAE) regarding the Information Collection Request for the Measures and Methods for the National Reporting System (NRS) for Adult Education (Docket Number: ED-2015-ICCD-0004).

ProLiteracy is a national adult education and literacy organization with a network of more than 1,000 adult education program members in addition to 4,000 customer organizations of our publishing division, New Readers Press. Our organization has been working for more than 65 years to increase the literacy, numeracy, and English language skills of adult students. More than 60 percent of our network receives WIOA Title II funding.

In our network of service providers across the U.S., WIOA-funded programs are serving and reporting on students—as best as possible—in order to help them reach education goals and create new employment and economic opportunities. However, these programs face challenges in NRS reporting. ProLiteracy’s objectives in our comments are centered around:

- 1) More accurate recording of student progress to reflect services that are actually being provided by educators. Programs that receive federal or state funding often only report what WIOA mandates, which helps ensure funding, but leads to inaccurate reporting—and underreporting—of student activity.
- 2) Adjustment of NRS reporting measures that encourage States and programs to develop and deliver *innovative* programming that meets both the students’ education goals and employers’ needs.

101 Wyoming Street, Syracuse, NY 13204  
315.422.9121 TEL | 315.422.6369 FAX



- 3) Removal of NRS reporting restrictions that, in practice, preclude access to many students seeking education and workplace advancement. The NRS does not accurately depict the full picture of AEFLA's role in increasing access for *all* students who seek career advancement.
- 4) Ensuring that lower-level students, although technically eligible for AEFLA programming, are not left behind due to the system emphasis on workforce development and post-secondary attainment.

ProLiteracy believes that enhancements to and flexibility within the National Reporting System are key to ensuring that adult educators can provide high-quality services that also accurately reflect all students' education and employment goals. Below are our recommendations:

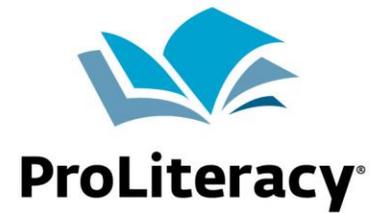
- 1) As it relates to Table IV, Column A, we request there be fewer restraints related to the requirement of using solely NRS-approved tests. Many ABE and ESL students that are technically eligible to participate in AEFLA services in WIOA-funded programs are often misreported due to these constraints. While NRS-approved tests serve as an important tool for many students, they hinder progress and achievement tracking for others. Educators focus narrowly on a perceived requirement for pre-testing, while there is no real basis for this within WIOA law or regulation.

Students seek educational services for a variety of reasons; therefore, conducting appropriate assessments lays the groundwork for effective service delivery, student persistence, and student progress. Standard NRS-approved tests do not accurately capture all aspects needed to diagnose and measure success for students who seek services for non-standard education goals related to employment, job advancement, or transition to post-secondary education.

For students for which NRS tests are not relevant, ProLiteracy proposes to allow for alternative, diverse, non-commercial tools (such as Northstar Digital Literacy Assessment, college readiness exams, etc.) as acceptable for reporting to the NRS.

Further, allowing for alternative testing tools will reduce time and cost constraints for service providers, thereby helping them focus on moving students through a smoother educational trajectory. Time and costs related to purchasing of tests, proctoring, and related data entry are increasingly onerous and prohibitive for many service providers.

101 Wyoming Street, Syracuse, NY 13204  
315.422.9121 TEL | 315.422.6369 FAX



COVID-19 has put a spotlight on the additional challenges and costs of *remote* testing. Disparities in relation to digital access present the risk of leaving vulnerable, hard-to-serve populations behind, especially those at the lowest literacy levels.

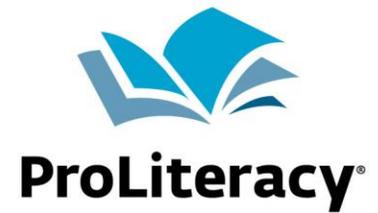
- 2) The NRS does provide specific guidance on how programs should report workforce preparation activities. Although these activities are embedded in OCTAE's Framework for Employability skills, the current NRS-approved tests do not accurately document important workplace literacy proficiencies including digital literacy, college-readiness, preparation for college-educated ESL students seeking employment in the U.S., and other important workplace literacy measures.

It is crucial that providers are able to account for student activities that prepare workers for success while on the job rather than through solely academic tests. The current workforce performance measures do not accurately reflect the workforce instruction of AEFLA programs.

ProLiteracy encourages OCTAE to permit reporting of *workforce preparation activities* and *workplace literacy* across all available measurable skill gains, thereby applying the same logic used to expand reporting for IET under the proposed ICR.

- 3) Even though digital literacy is becoming pervasive in adult education providers, it is currently impossible to be measured through NRS-approved tests. These tests are not appropriate for and do not accurately measure digital literacy competencies. ProLiteracy recommends that other competency-based standards and assessments (such as Northstar Digital Literacy Assessment) be considered in order to overcome the limits of the NRS framework so that critical digital literacy skills are not lost in federal reporting.
- 4) ProLiteracy contends that the federal system should include additional measures of progress related to high school equivalency attainment. Completion of a high school equivalency credential (or equivalent) is an intense and rigorous process. Further HSE credentials are ubiquitously recognized achievements not only by adult educators but employers, legislators, and others; yet, none of the NRS tables collect data on these achievements. Inclusion of these credentials would help the federal government and service providers more accurately portray program and student progress data.

101 Wyoming Street, Syracuse, NY 13204  
315.422.9121 TEL | 315.422.6369 FAX



- 5) Reporting on “distance education” is no longer relevant, and more importantly, there is inconsistency on how distance learning students are counted in all States. Over the past decade, service providers have increasingly incorporated digital learning; blended, hybrid, and—even more recently due to necessity brought on by COVID-19—solely distance education methods of delivering instruction. However, reporting mechanisms have not caught up. With distance education becoming ubiquitous across all States, there does not seem to be a need for Table 4C, as distance education is quickly becoming accepted as simply a way of providing instruction.

ProLiteracy appreciates the opportunity that OCTAE is providing to allow adult educators to comment on this ICR. Our comments reflect specific suggestions related to the ICR as well as suggestions for helping to ensure flexibility, relevance, and equity throughout the system. We look forward to OCTAE’s response to the public comments.

Sincerely,

Michele Diecuch  
Senior Director of Programs

101 Wyoming Street, Syracuse, NY 13204  
315.422.9121 TEL | 315.422.6369 FAX