September 21, 2020

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

Docket ID: ED-2020-SCC-0117
OMB Control Number 1830-0027

RE: Comments on the Proposed Revision to the existing “National Reporting System for Adult Education” Information Collection Request

Staff of the Texas Workforce Commission (TWC) appreciate the opportunity to comment on the proposed revisions to the Office of Career, Technical and Adult Education’s existing Information Collection Request (ICR) for the National Reporting System for Adult Education (NRS), published by the U.S. Department of Education (ED), in the July 23, 2020 issue of the Federal Register.

TWC, in partnership with its 28 Local Workforce Development Boards and its Adult Education and Literacy grantees, currently operates all four WIOA Titles (I, II, and III and IV) in addition to a wide variety of federally and state-funded workforce programs. This puts us in a unique position to consider proposed revisions in the context of the needs of the core programs and a variety of partner programs. Indeed, TWC applies WIOA reporting constructs in most of its programs – not just the WIOA core programs.

The WIOA vision of an integrated workforce system has been a reality in Texas for nearly two decades. TWC has extensive experience using integrated common measures across both state and federal programs and in using measures to foster innovation and help transform its’ system. It is with that experience and from that perspective that we offer our feedback and recommendations to improve the NRS model as provided in the attached document.

Thank you again for the opportunity to comment on this proposal. If you have any questions about these comments, please contact Adam Leonard at adam.leonard@twc.state.tx.us or (512) 936-5866.

Sincerely,

Edward Serna
Executive Director
Enclosure
Detailed Comments in Response to July 2020 Publication of OCTAE’s Proposed Revisions to the existing National Reporting System for Adult Education.

Table 4

The department’s proposal to expand the types of gains that can be achieved and reported is an important step in the right direction but is a very small step. There are several issues with it:

1) It continues to operate under the premise that Adult Education and Literacy (AEL) programs in the Workforce Innovation and Opportunity Act (WIOA) are largely the same program as they were prior to WIOA’s adoption: that everyone served is going to receive services/education based on the historic model structured around pre and post-testing to measure progress – basically the old Educational Functioning Level (EFL) model that was associated with the old program’s performance measures.

However, WIOA replaced the old EFL-Gain measures with the Measurable Skill Gains (MSG) measure. The Secretaries of Education and Labor defined five different methods for demonstrating gains in order align the measure with the types of services Participants would receive and the outcomes they were intended to produce. MSG is intended to measure progress towards the achievement of a high school equivalency credential, a recognized postsecondary credential, or employment. Although traditional EFL gain is one of the five types of gains reportable under WIOA’s MSG measure, there are four other types of gains.

While WIOA regulations require an assessment for AEL participants, there is no reason that the pretest needs to be designed to classify people into the various EFL levels. Many states have adopted a notion that a student must fall within specific EFL levels based on NRS approved tests to be eligible for the program. This requirement is nowhere in statute, however, requiring an EFL placement on reporting tables, blurs the lines. This age-old thinking limits our reach and ability to serve more individuals because this type of testing is not always warranted for eligibility determination or easily accessible by a potential student. Current constructs for EFL placement also create many challenges when working with employers and state partners to collaborate on initiatives such as:

1. **Alignment to Postsecondary Preparedness and Entry.** If the goal is to move participants into post-secondary education and career pathways, states should be able to utilize state postsecondary entrance exams as an option for eligibility determination and referral and placement into services. This would allow exiting AEL participants entering non-developmental education coursework to serve as the educational gain.

2. **Increase Number of Individuals Achieving High School Equivalency Credentials.** Having to utilize an NRS test just to place a student into an EFL level is burdensome to the student and costly to AEL programs when eligibility is already established by their lack of a high school diploma or its recognized equivalent. This over testing is a deterrent for many individuals in need of AEL services.

3. **Alignment to Serving Employers.** In order to better connect with and serve employers, considerations must be made to include employer-based competencies and negotiated learning goals. Employers do not want to pay for employees to attend long testing sessions solely for the purpose of being compliant with current EFL reporting, when they have specific goals in mind that do not require EFL determination. Many employers want services to support their
employees’ ability to advance within the company or provide learning gains that support other employment opportunities inside or outside of those organizations, such as skills related to communication, conflict resolution and other soft skills. There should be alternative options for ensuring eligibility that does not deter employer engagement. Likewise, so not to deter AEL programs from working with employers, use of all the MSG’s should be available to all students. Also, without the burden of time between test as required by NRS approved test publisher’s, students can achieve specific employer based milestones, like Type 4, that keep employer and AEL programs collaborative partners.

Therefore, we recommend that Table 4 (and all other tables that use the “EFL” construct to define the rows of data) be redesigned to include a row for people in programs where the appropriate assessment does not include classification into an EFL based on NRS approved test constructs.

2) Another issue we have with the proposed changes to Table 4 is that the expansion of reportable MSG types (which we support) is that the addition gain types are only reportable on people who are in Integrated Education and Training (IET). While we certainly agree that the expansion of reporting for these gain types is of value, we don’t believe they should be limited to only IET programs. WIOA allows AEL to partner with employers to provide employer-specific/contextualized education. Some of these programs may not be intended to result in a recognized credential but MSG isn’t limited to measuring progress towards a credential, it also measures progress related to employment.

In addition, we recommend that HSE subtests earned/passed be considered interim progress toward the achievement of the high school equivalency credential – for example passing a GED language arts or math test, which are administered under strict requirements by independent, often state approved test administrators, should be an allowable MSG. These tests are arguably more rigorous and objective than commercial NRS-approved tests which are often administered in less controlled environments and are more aligned with the student’s goal – they are tests that count toward the HSE. OCTAE’s traditional pre-/post-tests are just extra work and cost as students approach higher levels of literacy/numeracy skills. By adding a column to Table IV that measures “the number of participants who attained one or more subtests leading to a secondary school diploma or its recognized equivalent,” OCTAE and the federal partners could ensure that the NRS more appropriately reflects the intent of Congress by measuring objective progress directly related to credential attainment.

Therefore, we recommend that the new column G allow reporting non-EFL/non-diploma MSGs for all participants who achieve them and not merely those in IET programs.

Table 99

We generally object to this proposal because we’re already reporting on the performance rates and the number in the numerators in the regular 9169. That means that OCTAE can just derive these values from what is already provided to them rather than making states do the additional work of mapping this data into a new form.