

# Texas Workforce Commission

A Member of Texas Workforce Solutions

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Executive Director

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](mailto:adam.leonard@twc.state.tx.us) or (512) 936-5866.

Sincerely,



Edward Serna  
Executive Director  
Enclosure

1 **Detailed Comments in Response to July 2020 Publication of OCTAE’s Proposed Revisions**  
2 **to the existing National Reporting System for Adult Education.**

3 Table 4

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

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

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

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

- 28 **1. Alignment to Postsecondary Preparedness and Entry.** If the goal is to move participants into  
29 post-secondary education and career pathways, states should be able to utilize state  
30 postsecondary entrance exams as an option for eligibility determination and referral and  
31 placement into services. This would allow exiting AEL participants entering non-developmental  
32 education coursework to serve as the educational gain.
- 33 **2. Increase Number of Individuals Achieving High School Equivalency Credentials.** Having to  
34 utilize an NRS test just to place a student into an EFL level is burdensome to the student and  
35 costly to AEL programs when eligibility is already established by their lack of a high school  
36 diploma or its recognized equivalent. This over testing is a deterrent for many individuals in  
37 need of AEL services.
- 38 **3. Alignment to Serving Employers.** In order to better connect with and serve employers,  
39 considerations must be made to include employer-based competencies and negotiated learning  
40 goals. Employers do not want to pay for employees to attend long testing sessions solely for the  
41 purpose of being compliant with current EFL reporting, when they have specific goals in mind  
42 that do not require EFL determination. Many employers want services to support their

1 employees' ability to advance within the company or provide learning gains that support other  
2 employment opportunities inside or outside of those organizations, such as skills related to  
3 communication, conflict resolution and other soft skills. There should be alternative options for  
4 ensuring eligibility that does not deter employer engagement. Likewise, so not to deter AEL  
5 programs from working with employers, use of all the MSG's should be available to all students.  
6 Also, without the burden of time between test as required by NRS approved test publisher's,  
7 students can achieve specific employer based milestones, like Type 4, that keep employer and  
8 AEL programs collaborative partners.

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

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

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

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

### 33 Table 99

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