

WORLD EDUCATION/UNITED STATES
Strengthening the Impact of Adult Education



COMMENTS

on the National Reporting System

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Introduction to Comments to Docket Number: ED–2020–SCC–0117

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

World Education, Inc. (WEI) appreciates the opportunity to submit 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).

World Education advances economic mobility and wellbeing through education for vulnerable people and communities. In the United States, World Education supports older youth and adult learners by strengthening the educators, organizations, and systems that serve them. World Education is a national leader in building the adult education system's capacity to provide high-quality instruction and advising for adult learners. We collaborate with a wide range of governmental and nongovernmental partners to provide training, project design and management, resource development, and research grounded in program contexts. When adult learners further their education, they can improve their career options, advocate for their communities, and support their children's academic success. WEI submitted comments as the Workforce Innovation and Opportunity Act (WIOA) regulations were being shaped for the Adult Education and Family Literacy Act, WIOA title II. WIOA provided direction and a framework of policy and performance that could transform AEFLA grantees into full partners in the workforce system as envisioned by Congress, but this goal of WIOA has yet to be realized.

While the US Department of Education Office of Career, Technical, and Adult Education (OCTAE) has implemented activities required in statute and regulations, provided technical assistance, and made changes to the sub-regulatory guidance found in the NRS over the years since passage of the law, additional changes are needed to further or complete OCTAE's support for state and local implementation of service delivery systems under WIOA. These additional changes are necessary to support the law's purpose of increasing access and success for individuals with barriers to employment through opportunities for the employment, education, training, and support services they need to succeed in the labor market.

With over four years of complete NRS data under WIOA, federal and state agencies with local providers and partners have a more complete understanding of the shared performance accountability model under WIOA and have developed more enhanced models of supporting jobseekers and employers. In some instances, though, the NRS continues to act as a constraint to realize the full potential of law.

In addition to having sufficient data and mature models of WIOA programmatic implementation on which to base recommendations to the NRS, the COVID-19 pandemic has underscored significant weaknesses within the NRS related to testing and the required reporting of all participants within the six NRS levels as detailed below. This required reporting initially paralyzed and now significantly hampers state and local education and workforce continuities that could support the under-skilled workforce population significantly impacted by pandemic-related employment disruptions. These weaknesses

have origins that harken back to the Workforce Investment Act of 1998 (WIA) where pre/post-testing was the only measure for educational progress.

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 models for improving the NRS in order to support full implementation of the performance accountability under WIOA and alignment with the other WIOA Titles. The flexibilities we recommend will give state and local AEFLA providers the ability to design and deliver services to community members hit exceptionally hard by the pandemic who need education, training, and employment to regain an economic foothold for themselves and their families. World Education, Inc. stands ready to support adult education practitioners and systems doing the important work related to accountability under WIOA.

Overview

WEI offers the following points of discussion and recommendations regarding Measures and Methods for the National Reporting System for Adult Education. Our comments address both the revised Table IV, Measurable Skill Gains (MSG) by Entry Level as well as several additional areas within the NRS, including the NRS reporting related to distance education.

These comments focus almost exclusively on the measurable skill gains performance measure. WIOA Section 116 describes measurable skill gains as “the percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.” This definition underscores two main points that we believe the NRS needlessly restricts.

First, section 116 calls for a common performance accountability model using common indicators of performance to be applied to the core programs funded under WIOA. Congress made clear that they understood that not all indicators were appropriate for all programs and specifically made exceptions. For example, Wagner Peyser does not apply measurable skill gains or credential indicators due to the nature of the activity under that Title. Similarly, WIOA Title I Youth adds “or enrollment” in education to the post-exit measures to support in-school youth performance. If Congress had intended AEFLA to have unique parameters for implementation of measurable skill gains, it would have described these in the statute. While WIOA makes it clear that these programs should use the same indicators, it also gave the Secretaries discretion in defining parameters—not removing — indicators, and the Secretaries identified a variety of diverse achievements that represent measurable skill gains towards a recognized postsecondary education or training credential or employment. The NRS should support measurement and the same indicators and definitions as WIOA Adult, Dislocated Worker, Youth, and Vocational Rehabilitation.

Second, WIOA section 116 is clear that measurable skill gains is a measure toward outcomes in attainment of a credential or employment. The definition uses “or” rather than “and” to describe the two possible outcomes for participants meaning that performance accountability models in the NRS should support measurement of all participants against the variety of indicators that lead to credential or employment, not just participants in integrated education and training as the changes to Table IV propose. None of the listed purposes in WIOA espouse education for the sake of itself for participants. In

fact, even for WIOA Title I Youth, Congress provided for modification for both education or employment for in-school youth as described above. Undoubtedly, youth is a population for whom Congress most likely could have intended education-only activities under the Act. If Congress intended employment outputs and outcomes for high school youth, surely, it intended these measures for AEFLA participants.

Changes to the NRS described in our comments would support AEFLA's alignment with the accountability methods used in the other titles and the WIOA purpose related to employment, namely: "To increase, for individuals in the United States, particularly those individuals with barriers to employment, access to and opportunities for the employment, education, training, and support services they need to succeed in the labor market."

WIOA's Promise of Shared Accountability

Section 212 of WIOA made adult education and literacy programs and activities subject to the performance accountability requirements of section 116 of WIOA. These requirements apply across each of the WIOA core programs.

As WIOA states in Title II AEFLA: *SEC. 212. PERFORMANCE ACCOUNTABILITY SYSTEM: Programs and activities authorized in this title are subject to the performance accountability provisions described in section 116 (29 USC 3292).*

Congress underscored the importance of joint reporting in its Statement of the Managers to Accompany Workforce Innovation and Opportunity Act (Statement of the Managers) such that adult education and literacy programs could:

"use the same set of primary indicators of performance accountability outlined for all employment and training activities authorized under this Act."

and that these activities use a variety of measures to capture performance of individuals using these skills:

"in obtaining a regular secondary school diploma or its recognized equivalent, obtaining full-time employment, increasing their median earnings, and enrolling in postsecondary education or training, or earning a regular postsecondary credential."

Congress further emphasized that, while the Act had a strong objective of supporting postsecondary and employment objectives, lower-skilled individuals should not be left behind. Specifically, the Statement of the Managers emphasized that the measurable skill gains indicator be implemented by the federal agencies such that it accommodates reporting of "educated low level and under prepared adults."

The decision to limit MSGs, first by program (AEFLA), and second to a specific delivery model, goes against Congressional intent to intentionally create integrated, community wide solutions for individuals with barriers to employment. Joint guidance unduly limits Congressional intent and if Congress had intended to limit the use of MSGs (or any indicator), they would have done it; they did so by exempting WIOA Title III Wagner Peyser and adding education placement for WIOA Title I youth.

The statute, Statement of the Managers on WIOA, and resulting regulations are clear that a more expansive performance accountability applies to AEFLA to capture documented progress on the

measurable skill gains for performance. Unfortunately, the current NRS tables still maintain reporting remnants developed and implemented under WIA. These legacy structures weaken implementation of the five types of measures for the measurable skill gains indicator and betray a bias toward requiring academic measures for all AEFLA participants through reporting structures that favor the pre/post testing measure, Type 1a. These structures skew reporting and repress innovation and creativity around implementing services and programs that may be better measured by other MSG types. These legacy structures also result in unnecessary costs to local programs and States.

WEI welcomes the expansion of reporting parameters to table IV outlined in the ICR which allows for all measure types for the measurable skill gains indicator to be reported for integrated education and training activities and proposes additional expansion of the measurable skill gains indicator to further align reporting progress for programs designed to support an individual entering or advancing within a specific occupation or occupational cluster.

This recommendation supports stronger alignment to the flexibility Congress provided through the MSG indicator for capturing documented academic, technical, occupational, or other forms of progress towards such a credential or employment. Joint guidance further specifies that states use the various types of measures within the indicator measurable skill gains depending on the type of education or training program.

Recommendation: WEI suggests OCTAE apply the same logic and expand reporting on the MSG indicator to other types of programs for the purpose of transition to postsecondary education or training or career advancement.

Transition to Postsecondary Education or Training

The inclusion of enrollment into postsecondary education or training as a method for educational functioning level gain (Type 1c), is a welcome addition to federal guidance to implement the measure. Because this skill gain type removes the need for post-testing on NRS tests, it provides a very useful option to support enrollment of populations who are preparing for training or college and usually must already take other tests for college readiness associated with those programs.

On the surface, the measure positively recognizes the participants' accomplishment of enrolling in postsecondary education or training, yet the operational guidance on calculating the measure makes implementation of the method overly restrictive, leading to confusion and limited usage by practitioners.

Bullet six of the footnote for Table 4 states the calculation of the measure: "3) States may report an EFL gain for participants who exit the program and enroll in postsecondary education or training during the program year."

OCTAE Memorandum 17-2 provides greater detail:

c) States may report an educational functioning level gain for participants who exit a program below the postsecondary level and enroll in postsecondary education and training during the program year. A program below the postsecondary level applies to participants enrolled in a basic education program.

The requirement that a participant must enter postsecondary education or training, after exit, and do so all within a program year generates the following constraints:

First, the post-exit requirement for the measure is in conflict with statute, regulation, and guidance that clearly state that the measurable skill gains indicator is NOT an exit-based measure, but rather a metric used to:

measure interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs and can help fulfill the vision for a workforce system that serves a diverse set of individuals with a range of services tailored to individual needs and goals. (OCTAE Program Memorandum 17-2)]

Second, by pre-requiring exit, the guidance effectively excludes participants in the fourth quarter of the program year since exit requires 90 days of no service and the measure must be accomplished in the program year that ends June 30.

Like most education and training programs, adult education enrolls and serves many students on an August to May school year cycle. To use this MSG method, participants preparing to transition to college or training must end adult education services (and any services under any other WIOA Title) at a minimum of at least 90 days prior to June 30 and in reality well before to leave time to enter education and training by the end of the program year. As a result, the exit requirement restricts use of the method for many providers for participants desiring college training at the very point in the year (late spring) when participants would most likely be preparing for this transition. To use this measure type, educators must play a difficult game of calculation to ensure there is sufficient time for students to exit and enroll and do so on an individual student basis. This risky calculation results in programs either not using the method or attempting to use the measure and still post-testing on NRS tests just “to be safe.” This causes an undue testing burden on the program and the student.

Removing “exit” from the table descriptor removes the absolute service end date of 90 days prior to June 30 and would allow participation in adult education services to continue strongly through May to mid-June, when many school terms end and allow enrollment in transition to postsecondary education or training prior to the end of the program year, which better aligns to typical college and training program start dates.

Lastly, because “postsecondary education or training” is vaguely defined in the descriptor, the 1c measure creates troubling loopholes that encourage adult education programs to implement services that may not have been the intent of the measure.

OCTAE’s interpretation of MSG 1(c) as an exit measure only and OCTAE’s further allowance of developmental education courses as postsecondary creates a perverse incentive for adult learners to leave college preparation courses provided by AEFLA and begin tapping federal financial aid for developmental education courses below college-level. If OCTAE’s purpose for MSG 1(c) is to incent WIOA Title II programs to create college and career readiness programs that truly prepare individuals for college-level coursework, 1(c) should be amended to read: States may report an educational functioning level gain for participants who exit a program below the postsecondary level and enroll in college-level

postsecondary education and training during the program year. A program below the postsecondary college-level applies to participants enrolled in a basic education program.

To remedy these challenges, the NRS should take an approach, similar to the one used for measurable skill gains Type 3 and define transition to postsecondary education or training as “transcriptable or credit level” postsecondary education or training coursework. Credit hours and documentation on a transcript, such as a college transcript, would result in the higher skilled coursework beyond the basic education level indented by the measure.

Recommendation: Remove “exit” from the table descriptor and clarify that transition to postsecondary education or training is transcriptable or credit level coursework as described below:

“3) States may report an EFL gain for participants who transition from adult education and literacy activities the program and enroll in credit or transcript-bearing postsecondary education or training during the program year.”

Transition within Integrated Education & Training

Rather than an exit-based measure, MSG should incent programs to design and implement integrated education & training programs that partner adult education’s expertise in foundational skill building with high quality workforce training.

WIOA legislation and AEFLA regulation define and require “Integrated Education and Training” models which support adult education and workforce preparation concurrently and contextually with career and technical education. This ‘dual enrollment’ strategy for adults is undermined by the guidance on ‘transition to postsecondary’ within the National Reporting System. OCTAE should consider how its interpretation of ‘transition to postsecondary’ conflicts with the opportunity presented by IET and address scenarios in which ‘transition to postsecondary’ would be a measurable skill gain allowable while an individual was still enrolled in WIOA Titles I, II, and IV.

Additionally, MSG type 3 which rewards accumulation of postsecondary credits, directly conflicts with OCTAE’s interpretation of MSG 1c requiring exit. How would a program demonstrate MSG by postsecondary credit accumulation when the program is required to exit an individual at their transition to postsecondary education in order to measure a skill gain for that event?

Recommendation: OCTAE can address the transition from AEFLA programming to IET by adding an additional MSG metric. We propose the addition of MSG 1(d): “States may report an educational functioning level gain for participants who transition from a program below the postsecondary level and dually enroll in a program below postsecondary level and a postsecondary education and training during the program year.”

This performance measure can also be used to incentivize Ability to Benefit career pathway programs in which the WIOA Title II partner provides programming below the postsecondary level to help an individual achieve a secondary credential while the individual is simultaneously enrolled in an HEA Title IV eligible postsecondary education program.

Clarification of Postsecondary vs. College Level

All of the above are further complicated by confusion of terms. It is clear that ‘recognized postsecondary credentials’ include 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

“Postsecondary” needs to be clarified as distinct from “college-level coursework.” By definition, adult education offers programming ‘below the postsecondary level;’ which is undefined yet largely understood to mean instruction in the secondary level or below ‘college-level.’

However ‘recognized postsecondary credential’ is well defined in federal guidance and many recognized postsecondary credentials (e.g. apprenticeship, OJT, IRC) are offered below the college-level. In fact, many adult education integrated education and training programs offer industry recognized credentials and other documented postsecondary credentials with regional labor market value.

Additionally, OCTAE has twice released guidance <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-19-2.pdf> clearly allowing the use of WIOA Title II funds to pay for the ‘workforce training’ within IET programs. WIOA Title II practitioners wonder how workforce training can be in the purview of adult education because the term ‘postsecondary’ is confused with ‘college-level’ as documented by tests such as a NextGen Accuplacer which are used to assign cut scores for ‘college-level’ courses. This causes confusion in IET programming.

Recommendation: Beyond providing guidance for use of WIOA Title II funds for workforce training in integrated education and training programs, OCTAE should provide guidance to recognize that some ‘recognized postsecondary credential’ types happen below the ‘college level’ and are within the purview of WIOA Title II and other community based partners.

Use of EFL for Placement

The global pandemic has altered the way we do business. The education sector, including adult education, has felt this alteration at all levels by creating an immediate demand for educational services to be provided remotely. In AEFLA programs, the NRS created an additional set of unique challenges related to the requirement to establish an educational functioning level (EFL) for all students using standardized tests approved in the NRS. This requirement repressed enrollment of new students, many of whom had become unemployed due to the pandemic and became more available and motivated to pursue education.

This beginning EFL requirement on Table 1 created paralysis at the onset of the pandemic, one that States still have not been able to mitigate well. It also revealed to many practitioners that this requirement for all participants does not have a basis in statute, regulation, or joint guidance. It derives from the NRS alone.

In practice, having to categorize all participants within educational functioning levels restricts AEFLA’s ability to deliver the full array of educational career advancement services available under the law. It

also presents an undue cost burden on States already operating with budget deficits that will likely impact programming several years into the future.

Narrowly Defined Skill Gain

There is no argument that the measurement of skills on objective tests, both academic and technical, serves an important purpose in education and training programs. While AEFLA regulations are clear that a wide variety of measures are available to gauge learning across academic, technical, occupational, or other forms of progress for the measurable skill gains indicator, the NRS still requires, on Tables 1, 4, 4a, 4b, and 4c, that all participants be assigned an educational functioning level no matter their goal or the type of MSG measure best suited to that goal. This requires a pre-test for academic competencies to be administered.

Assessment of academic basic skills can be achieved in a wide variety of ways. Standardized testing is arguably one of the least effective, a point demonstrated in research literature and by teachers and administrators since at least the 1980s and a point that has led community colleges to embrace a multiple measures framework.¹ The result has been that K-12 and higher education measure progress, promotion, and graduation based on multiple measures for students², and these methods include both performance-based measurement and formative assessments designed for the actual content students learn, contextualized.

While WIOA provides for a wide variety of outcome measures for MSG, the NRS requires one method for entry-level assessment that may or may not have any relevance to the participant's goals. The pretest requirement and EFL are remnants of reporting leftover from WIA when pre/post testing was the only available educational progress measure.

Pre-testing on commercial NRS tests to identify an educational functioning level has become, de facto, one of the first phases every adult education provider conducts during a student's initial experience in adult education. Additionally, because the NRS and its technical assistance and reporting tables are required, many state data systems have been designed to restrict placement into classes until a student has a test score entered into the system.

The impact of this NRS requirement that all eligible participants under AEFLA be tested is overly restrictive and presents an undue cost burden on States due to the required purchase of commercial tests. In the District of Columbia, one adult charter school estimated it would take 38 full-time staff a total of three weeks to remotely proctor NRS assessments in order to begin the 2020 fall session. Luckily, the adult charter funding mechanism is generous. For AEFLA grantees operating under AEFLA only funding, this situation is untenable. Beyond cost, the pre-testing requirement also has a narrowing effect on the scope of services local providers and states implement.

The NRS tables and reporting instructions and testing requirements drive States and local programs to expend a significant amount of time and cost on standardized pre-testing and post-testing activities around a very narrow set of competencies. The requirements are so embedded in practice that there is

¹ Multiple Measures Assessment Project <https://ccrc.tc.columbia.edu/research-project/multiple-measures-assessment-project.html>

² Multiple Measures - California Community Colleges <https://assessment.cccco.edu/what-are-multiple-measures>

a pervasive understanding in the field, from State directors to teachers, that pre-testing is a required part of AEFLA eligibility.

These pre-tests also establish a de facto assumption that there must be a post-test to match. The fact that the majority of adult learners are still post-tested in AEFLA national, versus earning a gain through other methods, proves this and reveals that while Congress expanded the types of education and training services available to participants in WIOA, the NRS has maintained the narrow scope of activity from WIA. Clearly, the rollout of certain WIOA innovations, like IET, has been restricted due to this legacy understanding promoted in the NRS. The proposed changes out for comment on Table 4 should change that, but should go further to reexamine the pre-test requirements.

Programs that offer creative services aligned to AEFLA's more expansive roles related to postsecondary education or training or career advancement still opt to post-test students and then implement other tests more aligned with meeting other MSG measure types, such as a GED Ready test (Type 2 MSG measure); college entrance tests (for the Type 1c MSG measure); or certification tests or other assessments (for MSG Types 3, 4 and 5). In fact, other assessments created by test companies with products on the NRS - like the CASAS Speaking Test - would be valuable tools in a variety of adult education settings, e.g., a workplace English language learning course could use the CASAS Speaking Test to document an MSG type 4. Test makers have excellent products that they do not attempt to have listed on the NRS. The end result in these types of scenarios is that the NRS required pre-tests and post-tests are either unnecessary or not the best tools aligned to the activities. This creates a significant and unnecessary cost burden due to duplicate or over testing, and it makes it harder for AEFLA programs to be a nimble and innovative partner.

NRS Impact During the Pandemic

As programs retooled for services in response to the COVID pandemic, they immediately realized that testing and particularly pretesting new students was impossible to do remotely and not permitted under the NRS. After test publishers developed detailed protocols to use their products remotely, and OCTAE approved them, providers soon found that remote testing is exceedingly onerous and time consuming to administer. They also found that the process disproportionately excludes the hardest to serve individuals in their community due to a lack of digital access and low literacy. As a result, many programs either choose to not serve new students or they opened facilities for standard tests with social distancing, an activity that, at best, presents unnecessary health risks due to the hours individuals must spend together testing, and, at worst, is against state laws that forbid unnecessary gatherings.

The result was that pre-testing, which is not required in statute or regulation, immediately became a major impediment to service implementation. It added additional constraints to states and local providers already under extreme pressures to redesign classes for remote delivery and support the burgeoning population of those unemployed, a population disproportionately represented by underskilled individuals who would most benefit from education and training services to become competitive in the labor market.

The undue mandate created the required entry EFL seems even more burdensome when viewed in the broader context of the education sector. Imagine today, if the U.S. Department of Education required all public school children to be tested before they could begin K-12 services. One can imagine the

constraint and public outcry if it did, especially since it is not required in ESSA. Higher education, seeing the pitfalls of using standardized tests as the sole indicator for admissions and placement has, rightly for years, used multiple measures for admission and arguably has greater flexibility and creativity in meeting the remote teaching and learning mandate.

In an emergency response to the pandemic, OCTAE released OCTAE Program Memorandum 20-05 which approved the use of a “provisionally assigned EFL” for placement. While positive in intent, this change did not alleviate the issue, but simply delayed the challenges, and actually created a series of other challenges as states and programs spent significant time during the crisis developing policies for “provisionally assigned EFLs” as well as promoting and training staff on the new processes.

These challenges of provisionally assigned EFL continue as programs quickly realize that consistency issues for placement and performance arose as students were placed without consistent and well considered objective criteria during the crisis.

With testing and thus pre-testing to admit new students, as a major constraint, the requirements to test had the added impact of reducing adult education’s response to support individuals impacted by unemployment related to the pandemic who were seeking services.

NRS Testing Does Not Fit All Learners

Imagine the following students: An English language learner who is college educated in their home country and wants to attend college; An individual seeking a GED®; A worker who is told he will not be promoted if he cannot gain the reading and math skills needed to operate a new piece of production automation equipment in his plant; A student who wants to go to college in four weeks, is worried about the costs, especially the costs of taking non-credit remedial courses which she knows she will need because she has been out of high school and her math skills are weak.

These are all eligible participants under AEFLA, but they are participants who do not need an NRS pre-test to begin services, in fact, none of them do.

For the first, a TOEFL test may be the best diagnostic for skill deficiencies related to the test he has to take for college admission. For the individual wanting her GED®, the GED Ready® exam is, of course, the best indicator of performance for the test, not a TABE® or CASAS® test. The worker needs a test customized for the skills needed to read and operate the production equipment and his employer would be frustrated if the initial six hours of the workplace literacy class was spent on a TABE® test. The hopeful college student has four weeks and needs an intensive “college boot camp” math class. For her tests associated with that high-stakes college entry exam are most important, but the program will spend hours giving her a TABE or CASAS, then, the tests associated with college entrance.

The NRS pre-test is an unnecessary activity for these individuals and not necessary for them to earn a gain through one of the types of measurable skill gains available under WIOA.

Enrollment Attrition Related to Pre-Testing

Pre-tests, especially one of the most popular the NRS tests that takes up to six hours to administer, cause many hopeful individuals to drop out during intake due to the length of time testing takes and

first impression it creates about the educational experience. Many individuals entering adult education have been failed by education systems in the past and it takes a great amount of courage to return to school, sometimes after years, and often multiple attempts to gain education. Adult education programs welcome these individuals with excessive testing, most likely the last activity they have positive experiences with. For example, as an individual selecting an evening class that operates two hours twice a week will spend at a minimum, the first three classes over two weeks taking a test. The result is that many students don't return to class the second or third night due to the testing requirements.

In the case of workplace literacy programs, many employers who are often looking for quick delivery for their workers, become frustrated with excessive testing at the onset, especially when their objectives do not align to the content of the standardized test. The need to use a pretest to establish classes with different levels is inconsequential, since the employer usually desires to offer the classes for all workers and has no intention of offering separate classes or denying some workers access based on level. Some employers simply decline AEFLA services due to the onerous testing requirements, an unnecessary performance exercise if Table 4 is modified as discussed in comment 2.

Illogical Requirements for State Assessment Policies

While participants may earn a measurable skill gain through various available measure types along with post-testing, the NRS requires States to list in their annual, federally approved assessment guide a post-test rate with a specific target of all participants. The rate is the percentage of those pre-tested (denominator) who both meet that threshold of instruction and take a matched post-test (numerator).

Because not all participants are required to take a post-test, States have no mathematical way to calculate a rate since the numerator is impossible to predict given the MSG outcome options available. The post-test rate is a legacy that was relevant under WIA.

An Alternative to the EFL Level Taxonomy

Arranging participants by entry educational functioning levels reflects a bias back from WIA toward aligning adult education to a familiar K-12 grade level framework—success is measured as students progress up to the next grade, or level in adult education. This led to the creation of large adult education programs with classes arranged solely by NRS test level, leading to an imaginary adult education student who will start in beginning ABE and progress through advanced ASE over a period of years. The average adult education participant puts in less than 100 hours in an adult education classroom. Sequential strategies are ineffective in this time period. Integrated, accelerated strategies are needed.

To local programs, knowing the enrollment EFL post-tested for participants in specialized classes is not worth the time and cost of testing them on an NRS test, and may waste precious time since the participant is often also assessed by methods specific to the objectives of the specialized class, for example a GED Ready test, for individuals preparing for that exam. The burden of reporting all participants by EFL produces national data with very limited use except the number of participants by level.

In summary, the requirement for pretesting and reporting all participants by EFL in the tables provides arguably unreliable and misleading results and establishes an undue burden on providers and participants who are being over-tested or given tests not aligned to their objectives. For programs, this means additional costs and needless time spent on activities that do not directly align to the participants goals or program activities. It also has the effect of dampening the enthusiasm of employers for engaging in adult education.

Recommendation: WEI recommends that OCTAE add a 7th row for “Non-leveled” or “Other Participants” on Tables 1, 4, 4b, 4c for participants whose goal is to earn an MSG through a method other than post-testing.

Measuring Workforce Preparation with MSG

OCTAE has said that all AEFLA participants “are in an education or training program that leads to a recognized postsecondary credential or employment” and therefore subject to the measurable skill gain performance measure defined as “The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized post-secondary credential or employment and who are achieving measurable skill gains, defined as documented academic technical, occupational, or other forms of progress, towards such a credential or employment.”

OCTAE has also said that the skills gained through workforce preparation are measured through MSG pre/post-test via the NRS-approved assessments. However, there is no way to measure digital literacy via paper and pencil based standardized assessments. In fact, the 21st century skills included in ED’s Employability Framework and a whole host of other essential skill frameworks cannot be measured by a standardized assessment:

“In recent years, ILSAs such as ICCS and PISA have started to include 21st century skills among the domains being assessed. This has increased the interest among policymakers to include these skills in their own curricula and explore systems-level assessments of selected skills. A key principle for policymakers and decision-makers is to first set the policy goals, taking into consideration systems-level issues, before choosing the particular skills or skill sets that are to be included in the curriculum and assessed at the national level. National policy goals can be complex and involve issues both directly connected to education (including budget constraints and educational priorities) as well as issues that are only incidental (e.g., politics and changes in government) (Wagner, 2011). This key principle avoids ad hoc choices among policymakers as well as emphasizes the importance of linking the implementation decisions with well-planned policy.

The effective use of assessment data is only one component in the teaching and learning process, but it is an essential piece of the whole system. Many of the lessons learned and best practices on general data use in education remain important and applicable in the context of 21st century skills assessment, but the qualitatively different structure of 21st century skills requires new approaches, both in the measurement aspect and collection of assessment data. One of the key principles emphasizes the importance of designing the data-capture process systematically.

In the context of 21st century skills, the data-capture process is not well established compared to traditional domains. It is therefore recommended that robust data-centered tools are developed to show that the data-capture process for these complex learning goals can be made as systematic as in traditional domains. This recommendation has a two-fold benefit: 1) tool development, especially if done across all levels of the school system from the classroom all the way to national scale, raises awareness through proof-of-concept approaches in tool/task development; and 2) the development process, undertaken collaboratively and through engagement of various stakeholders can have a cumulative effect on building a set of best practices.

Widespread adoption can be slow, just as it was for tools (e.g., mechanized standardized tests) and methods (e.g., item response theory) that were developed for conventional domains, where it took several decades for most modern methods to become standard across systems. Even for core domains such as numeracy and literacy, the adoption of modern data-collection tools and processes has not been universal. However, the build-up becomes faster as more stakeholders become aware of what methods exist and what data-capture processes are possible.

To ensure that this recommendation's focus on awareness raising is optimized, sets of best practices and resources need to be readily accessible through multinational networks. Policymakers are more likely to adopt new tools or data-capture processes if empirical evidence that they work is available, and if they see these being adopted by other systems. Finally, we recommend that data reporting be aligned more closely to the stakeholder purpose and to the needs of the target consumers.

In these early days of implementation of 21st century learning goals through national education systems globally, our attention is focused on how to ensure that assessment can facilitate learning rather than merely attempt to grade or rank it."

Research from: Use of data from 21st century skills assessments: Issues and key principles Alvin Vista, Helyn Kim, and Esther Care

Recommendation: [As NRS tackles the introduction of new measurement systems for all of these critical skills, we suggest starting with overt guidance allowing digital literacy assessments for all AEFLA participants via MSG type 5 on Table 4.](#)

Distance Education

Table 4 C Distance Ed

World Education's EdTech Center has great expertise in supporting distance education policy and practice. EdTech Center leads the Innovating Distance Education in Adult Learning (IDEAL) Consortium of 16 leading States and DC in AEFLA distance education. Many of the participating States were around during the inception of Table 4c which was meant to gauge the work in the field and evaluate whether or not distance education resulted in the same types of learning outcomes as non-distance education.

Fast forward many years and now - even pre-pandemic - most adult education programs are doing a blended model of varying percentages of in-person and online learning, so the accounting reflected in

Table 4c makes little sense. Additionally, since each State makes their own determination of whether a person is a 'distance education' learner or not, the inclusion of NRS Table 4c actually results in data that is not useful in evaluating adult education as a field. For example, the 2018-2019 aggregate reporting for AEFLA shows that on Table 4 MSGs are achieved at a rate of 44.81% for ABE levels, 45.94% at ESL levels; for a grand total of 45.38% of AEFLA participants achieving an MSG. The 2018-2019 Distance Education Table 4c shows a rate of MSG achievement of 45.87% for ABE (slightly higher than non-distance education); 38.03% for ESL levels (significantly lower than non-distance education); for a total of 43.56% of distance education participants achieving a Measurable Skill Gain. From the NRS tables, one might conclude that distance education is better for ABE populations than non-distance but worse for ESL participants. However, with state-by-state decisions on who gets counted where and with no ability to see the type or duration of distance education provided, the data collection tells us nothing of value. Local practitioners' primary concern with distance education data collection is 'what counts' in distance learning based on the setting rather than on what works.

However, education experts know the value of distance education. In fact, the US Department of Education's recent release of updated *Distance Education and Innovation Final Rule* clearly articulates the importance of going beyond reporting to develop guidance that promotes innovative models:

The COVID-19 pandemic has brought renewed attention to the need for postsecondary institutions to expand high-quality learning opportunities through the use of remote and advanced technologies to assist students in reaching their educational goals. Crafted by a diverse group of experts during the Department's 2019 negotiated rulemaking, these final Distance Education and Innovation regulations establish the right framework to facilitate innovation while maintaining educational quality, as well as important safeguards to protect students and taxpayers. These flexibilities go beyond the temporary waivers offered during the pandemic and provide the certainty institutions need to make longer-term investments in the development of new learning strategies, materials and opportunities. They also respond to Secretary Betsy DeVos's call for institutions, educators, and policy makers to "rethink higher education" and find new ways to expand educational opportunity, demonstrate the value of a postsecondary credential and lifelong learning, and reduce costs for students, schools, and taxpayers.³

Secretary DeVos has also encouraged AEFLA grantees to "rethink adult education" and to "Rethink Everything." To incent innovation, OCTAE should create a comprehensive set of competencies and related outcomes and not "count" hours based on modality. That would actually allow for State policies that align with evidence-based practice. For example, the term "blended learning" has always been problematic. It means one thing when talking about instructional strategy. Then, if trying to fit that instructional strategy into the NRS tables, the online part of blended tends to be defined as "distance." This leads programs to only conceptualize the technology-rich part of blended as what happens at a distance - completely discounting the efficacy of blended models such as lab rotation and station rotation.

What is needed now is a data collection tool that will let adult education evaluate the use of "Technology Enhanced Learning" regardless of setting and will accurately depict the proportion of learning happening via technology: who is equitably engaging in that learning, and what are the results.

³ <https://www2.ed.gov/policy/highered/reg/hearulemaking/2018/distanceandinnovationfactsheet.pdf>

Recommendation: Update Table 4c to collect the information needed now to understand what works and for whom in technology-enhanced learning. This updated table would include the full complement of WIOA Measurable Skill Gain types and WIOA exit based measures mapped to participant demographics and individuals with barriers to employment characteristics. It would also delineate the proportion of 'Technology Enhanced Learning' that participants experience (e.g. 0-25%; 26-50%; 51-75%; 75-99%; 100%). This NRS reported data, backed by clear definitions to be shared across all AEFLA grantees, would allow NRS Table 4c to help guide the field of adult education toward better solutions for adult learners.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Silja Kallenbach', with a long horizontal stroke extending to the right.

Silja Kallenbach
Vice President