

September 21, 2020

Director

Strategic Collections and Clearance Governance and Strategy Division

U.S. Department of Education

400 Maryland Ave SW, LBJ, Room 6W208D

Washington, DC 20202–8240

Re: Document ID ED-2020-SCC-0117

To Whom It May Concern:

World Education Services (WES) Global Talent Bridge submits this comment in response to the revision of the “Measures and Methods for the National Reporting System for Adult Education,” as set forth in the July 23, 2020 Federal Register. Through policy advocacy, research and content creation, partnership building, and direct programming, WES Global Talent Bridge seeks to ensure immigrants and refugees in the United States fully use their international credentials to integrate into the workforce. Based at WES Global Talent Bridge, the Skilled Immigrant Integration Program helps create and expand proven and promising immigrant professional integration approaches by working with communities to further their state and local skilled immigrant integration efforts.

The Migration Policy Institute (MPI) estimates that there are about two million immigrants in the U.S. with college degrees who are underemployed or unemployed.ⁱ A contributing factor to this underemployment is a lack of professional English proficiency. Tailored English programs, using contextualized curriculum that focuses on the competencies required in professional jobs, are needed to address this challenge. In addition, WES Global Talent Bridge recommends the Office of Career, Technical, and Adult Education (OCTAE) conduct a review of its performance accountability measures to determine the most effective measures of progress for professional immigrants and refugees with international credentials.

English for Speakers of Other Languages (ESOL) programs can play a key role in advancing linguistic, economic, and civic integration of immigrants and refugees with international credentials. Most federally funded programs, however, do not offer the technical instruction necessary to succeed in professional careers. Additionally, many adult ESOL programs have yet to capitalize on the organized network of providers, employers, educators, and other stakeholders poised to help meet the critical need for professional-level, technical English instruction.

A lack of data collection of the education levels of students in federally funded programs limits the ability of ESOL programs to appropriately and adequately serve immigrants and refugees with international credentials. As a result, ESOL providers often offer only mixed-level ESL classes that combine students with varying education levels. In addition, the data tables in the NRS provide insufficient information on the accomplishments of adult education programs. For example, the current measurement requirements account for just the highest measurable skill gain of an individual without regard to measurable skill gains attained throughout the reporting period.

Increased flexibility in the NRS accountability framework, a tailored, contextualized curricula, more robust data collection, and greater partnership with service providers who have experience serving internationally trained immigrants and refugees would enable OCTAE to respond more effectively to the needs of immigrants and refugees with international credentials. WES Global Talent Bridge looks forward to continuing to work with OCTAE to address these challenges. Thank you for the opportunity to comment on the proposed revisions to the NRS.

Sincerely,

WES Global Talent Bridge

¹ Migration Policy Institute, *Untapped Talent: The Costs of Brain Waste among Highly Skilled Immigrants in the United States*, (2016).