

September 17, 2020

Comments on the Information Collection Request (ICR) the Measures and Methods for the National Reporting System (NRS) for Adult Education (**Docket Number: ED-2020-SCC-0117**).

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

For over 25 years I have been an adult educator with Pima Community College Adult Basic Education for College and Career, a program funded through the Arizona Department of Education and US Department of Education (ED) Office of Career, Technical, and Adult Education (OCTAE). I am pleased to have this opportunity to comment on the Information Collection Request (ICR) the Measures and Methods for the National Reporting System (NRS) for Adult Education (Docket Number: ED-2020-SCC-0117). These comments and recommendations are my own, not a reflection of the program that I work for.

I have worked to implement the WIOA vision and objectives, and have found roadblocks within the NRS system that have challenged implementing the true spirit of the law. The COVID 19 pandemic has also revealed weaknesses within the NRS, particularly related to testing, the required reporting of all participants within the twelve NRS levels, and the unmeasured digital literacy access and skills of adult learners. Using pre-test/post-test as the primary measure for educational progress severely limits the reporting on reality of learners' progress and skill development within adult basic education.

I believe in the spirit of WIOA: Serving our community members with the lowest skill levels, speeding up students ability to gain basic skills/high school equivalency as well as college and career certifications and degrees through workforce prep, career pathways, IETs and stackable credentials, and collaborating with workforce partners is work I have help move forward in Pima County, Arizona. I hope my comments demonstrate that to deliver services to those in need of education, training and employment, and challenged by the pandemic, programs need ways to measure students' achievements with a broader, more equitable system.

**Recommendation 1: Eliminate the categorization of all participants by Educational Functioning Levels**

The impact of all participants needing to be pre-tested is overly restrictive and presents an undue cost burden on states due to the required purchase of commercial tests that do not directly align to the participant's goals or program activities. This requirement also has a narrowing effect on the scope of services local providers and states implement. I suggest the following:

- Remove Table 1 and collect participant age and ethnicity data on Table 2
- Replace EFL level data on Table 4 with age categories similar to Table 2.
- Modify Table 4b to include a column for pre-tested students. Report pre-test EFL level data on Table 4B only for participants who will be measured by pre-test/post-test.

Or

- Change table 4: Add a 7th row for "Non-leveled" or "Other Participants" on Tables 1, 4, 4b, 4c for participants whose goal is earn an MSG through a method other than post-testing.

Current NRS reporting requires that all participants receive a commercial NRS-approved pre-test, however, not all individuals eligible Title II participants need a pretest to begin services and can earn an MSG contextualized for their targeted objective. Many other assessments, some required for

participants to achieve their goals, can serve the same purpose of assessing initial skills, such as GED Ready®, TOEFL, a workplace-contextualized basic skills test and/or digital literacy test, or a college placement test. Participants are regularly given or taking these kinds of assessments while at the same time taking lengthy commercial NRS-approved tests simply to comply with program reporting requirements. This is unnecessary overtesting.

This overtesting has detrimental effects:

1. Learners seeking swift support for college or career goals are discouraged from participating because required assessments do not match their learning goals.
2. Students become discouraged and drop-out because of standardized testing that feels irrelevant to their goals and which is often the first activity they experience, lasting up to six hours spread over several days
3. In-person test requirements at intake make distance learning difficult or impossible
4. Employers do not want to work with Title II programs when irrelevant and unnecessary NRS pre-testing is required
5. The NRS creates a de facto WIOA eligibility requirement with no basis in law or regulation or joint guidance by carrying on the WIA practice of pretesting; from State directors to teachers, there exists an understanding that pretesting is a required part of Title II eligibility
6. States and programs pay for unnecessary assessments
7. Programs spent time and funding developing policies and guidelines for testing and compliance; positions are funded with assessment as their primary focus; compliance managers, student services and data staff now eclipse the number of teachers in many programs; dedicated space has been allocated FROM classroom TO assessment center simply to accommodate the required pretesting.
8. When measured by one high-stakes test, true skill gain of individual learners cannot be shown to participants, funders or Congress
9. Discourages innovation and partnerships where contextualized assessment is more appropriate

Adult educators care about their students, and they know that students enter with the diverse goals related to learning English, earning a high school equivalency or diploma, employment or career advancement, and/or transition to postsecondary education or training. Adult educators comply with NRS requirements *and then* use various formative assessments and skills inventory to actually determine students' needs based on students' real-world goals. Adult educators know that initial skills assessment must be achieved in a variety of ways, and that decades of research proves that standardized testing is the least effective. To address this disparity, community colleges have embraced a multiple measures framework using methods that include both performance-based measurement and formative assessments designed for the actual contextualized content students learn. I recommend that NRS adopt multiple measures framework and methods as well.

The pandemic has opened our eyes glaring inequities in all levels of education and training. As related to this recommendation, the program I work for determined quickly that remote testing was impossible (not to mention that it was not allowed per NRS guidance). Once processes were NRS approved, the time required by staff to test thousands of continuing and new students using the TABE and TABE CLAS E was not a viable solution. State leaders and programs worked hard, spending time and funding to develop **new** policies and procedures for enrollment and data collection. Remote test proctoring has become an impossible barrier for the back-log of students who need our program. Remote proctored testing excludes the hardest to serve individuals and those who struggle with digital access and low

literacy. Our local economy and our sense of equality and humanity meant that we had to forgo the NRS pretesting requirement. Despite waived regulations, NRS MSG demands continue to make us afraid for our future and for the future needs of adult students in Pima County. Our services have been impacted unnecessarily by holdover rules and restrictions of the NRS and many unemployed individuals are not receiving adult education services.

Beyond the unnecessary costs, restricted access, frustration for students, employers and WIOA partners, the current reporting of initial EFL levels on Table 4 seems to be a K-12 framework and a one-size-fits-all taxonomy. WIOA progress outcomes are more varied and related to real-world progress across training and occupational accomplishments—entering college or training, earning an HSE, earning a milestone at work or attaining technical or occupational skills based on an exam. Allowing states to report participants whose eligibility is established through other objective methods would reduce glaring inefficiencies and burdens in service delivery for participants and undue costs to states.

**Recommendation 2: Table 4, expand reporting to include all types of measurable skills gains for all types of students**

I recommend retaining the proposed expansion of reporting for integrated education and training described in the IRC and expanding reporting on Table 4 to include reporting across all types of MSGs as described in the joint guidance OCTAE Memorandum 17.2 / DOL Labor Training and Employment Guidance Letter 10-16 for workplace adult education and literacy activities and workforce preparation activities.

Revise Column G on Table 4 to read:

“Number of IET participants in postsecondary education or training transition or career advancement activities who achieved an MSG other than EFL gain and secondary school diploma.”

Make a similar edit to column N. Make corresponding edits to the notes for columns G and N. Add a note that defines the applicable program activities such as: “Activities for the purpose of postsecondary education or training transition or career advancement mean integrated education and training, workforce preparation activities and workplace adult education and literacy activities.”

While workplace literacy activities are intended for all participants in Title II programs, the NRS restricts reporting to academic outcomes. By their very definitions, workforce preparation and workplace literacy activities also support education, training, and employment outcomes. I recommend OCTAE apply the same logic and flexibility for all, not just for IET participants.

Changing Table 4 to measure these gains ONLY for IET participants will create unnecessary and onerous work for states and programs as they create processes and procedures to break out and measure IET participants differently from others, not to mention that IETs are already measured on Table 11.

Local providers implement, or desire to implement, a wide variety of activities—digital literacy, college prep bootcamps, resume writing— but consistently have concerns about how to report such activities “to get a gain”. The result is programs do these activities because they are the right thing to do for students but find no way to get ‘credit’ for the student, program or the state in NRS reporting. Digital literacy is a primary example, exemplified by the move to virtual classes during the pandemic. Digital literacy is a first-line critical skill all adult learners need, and yet, there is no reportable skill measure to

show student achievement in this area. These and other workforce skills are becoming more and more pervasive in programs nationally but are lost in reporting. The intent of WIOA was to support adult education as a full workforce development partner to support the economic success of adult learners and act as a support to lift individuals out of poverty. Rather than embrace this mission, the NRS, with its adherence to legacy academic-only reporting for activities such as workforce preparation activities and workplace literacy suppresses the ability of providers in supporting learners on that mission.

**Recommendation 3: On Table 4, expand guidance to allow reporting of all postsecondary work during and beyond time in Title II**

Remove “exit” from the table descriptor and clarify that transition to postsecondary education or training is transcriptable even if concurrent with Title II

The inclusion of enrollment into postsecondary education or training as a method for achieving a gain, is welcome. Because this skill gain type removes the need for post-testing on NRS tests, it provides a very useful option to support students who are preparing for training or college and must take other tests for college readiness associated with those programs.

While the measure recognizes the participants’ accomplishment of enrolling in postsecondary education or training, the guidance on calculating the measure makes implementation overly restrictive, leading to confusion and limited usage. NRS must recognize that some postsecondary credential types are within the purview of WIOA Title II and postsecondary credential includes 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](https://wdr.doleta.gov/directives/attach/TEN/TEN_25-19.pdf) (Apprenticeship).

Congress desired that WIOA support learners in post-secondary and employment objectives, and as programs have developed IETs, students co-enroll in credit classes while also continuing their basic skills learning through Title II. In the end, students may successfully complete a college/industry recognized certificate. However, post-secondary work accomplished by these co-enrolled students cannot count toward an MSG. This seems out of alignment with the spirit of WIOA.

OCTAE Memorandum 17-2 provides 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 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 (OCTAE Program Memorandum 17-2). By pre-requiring exit, the guidance 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.

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 ensure there is sufficient time for students to exit and enroll. This often results in programs post-testing on NRS tests just “to be safe,” 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 allowing transition to postsecondary education or training prior in alignment to typical college and training program start dates.

#### **Recommendation 4: End of the artificial use of July-June timeframe for achieving an MSG and the use of Periods of Participation (POPs)**

Clearly, there needs to be a time-frame for reporting, however, any time frame must be acknowledged as artificial. Students enter Title II programs at any time during the year. Having exit measures that can correlate to MSGs but must be achieved after 90 days of no service excludes participants in the fourth quarter of the program year since exit is required and the measure must be accomplished in the program year that ends June 30. Likewise, programming that co-enrolls or collaborates with colleges, training programs or employers may need to span the reporting timeframe, and thus, students enrolled in those classes or programs will count *against* program performance when measured at June 30. This discourages programs from entering into these partnerships and/or creates a need for programs to pre- and post-test students on accelerated timelines just to get an assessment by June 30.

Use of periods of participation (POPs) complicates the reporting process and POPs do not accurately reflect the reality of Title II programs. The use of the standard POPs specifically complicates reporting in Table 4, and the structure of the table makes it impossible for programs and states to report all the MSGs participants have gained. The true functionality of Periods of Participation is unclear. In reality, students may need to step out and back into Adult Education programming throughout a fiscal year. POPs are not a true indicator of student persistence and fail to accurately reflect the progress a student may make in a fiscal year with separate periods of participation. Table 4 attempts to capture data from all POPs yet Table 4B only looks at the first POP. I recommend eliminating POPs.

#### **Recommendation 5: Permit reporting of all High School Equivalency diplomas.**

As currently formatted, the federal tables do not help programs or states to track the total number of High School Equivalency diplomas (HSED) each year. Yet, this is the most requested data point by local and state stakeholders when evaluating the effectiveness of adult education programming. The system fails to recognize that high school equivalency is an important outcome in itself, whether or not a student goes on to postsecondary education. As an example of this problem, no table collects data on all high school equivalency diplomas.

Table 4 recommendations:

- Capture ALL HSEDs in the columns on Table 4; AND/OR
- Create a Table 4d which captures all HSEDs and disaggregates HSED totals by type, e.g., GED; TASC, competency based; etc.

Table 5 Recommendation:

- Revise guidance on Table 5 to remove “9th grade equivalent or higher” language as it has no consistent meaning in federal reporting. Expanding to all levels will better capture the real impact of Adult Ed programming.

**Recommendation 6: Do not include Table 99 in NRS reporting**

Table 99 is duplicative, extra work for states to complete. It is my understanding that all or part of Table 99 will not automatically calculate which will require states to do additional calculations. These labor measures align to all WIOA Titles, but they are not a good measure of the work of Title II. The complexity of when and how to track these outcomes is a heavy burden for local providers and state offices. Because data is reported on an annual timeframe, by the time we are following up with many learners the previous year's data is closed out.

**Recommendation 7: Expand Sex/Gender and race categories for self-reporting**

In the current context, requiring students to choose from a limited and outdated list for self-identification around gender and race risks losing participant engagement. It creates the potential for students to feel unrepresented and unsafe. Allowing for optional self-reporting of gender identity and race shows inclusivity and respect for all participants.

- Eliminate required self-reporting as male or female
- Expand options available for self-reporting of Gender Identity, and/or make self-reporting optional, not required
- Expand options available for self-reporting of Race, and/or make self-reporting optional, not required

**Recommendation #8: Eliminate Table 4C for Distance Learning**

Eliminate Table 4C as it is no longer relevant. Table 4C began as a place to gauge and evaluate learner outcomes in distance learning, for students whose distance learning hours accounted for more than 50% of their attendance hours. Today, Adult Education systems around the country have implemented both distance learning and blended learning to provide flexible access to students. Adult Education systems need to collect data that evaluates all student engagement through the various means of student participation, distance learning, blending learning, and face-to-face learning.

Thank you for considering my recommendations.

Sincerely,

Adam Hostetter