



World Education, Inc. US Division (WEI) supports adult education learners by strengthening the systems and practitioners who serve them. WEI submitted comment on proposed NRS changes via the ICR ED-2020-SCC-0117-0022 because our deep experience in the field has shown us clearly that what gets measured is what gets valued *and* what gets valued is what gets done.

WEI was pleased that so many adult education stakeholders submitted a range of comments for improving the WIOA title II accountability system. The pain being experienced by adult education programs and participants as they struggle to comply with their established assessment protocols via remote assessment is real. But beyond the current pandemic-related context, stakeholders submitted clear and convincing argument that the adult education system needs to modernize in order to serve our communities better.

WEI is disappointed in OCTAE's primary argument that OCTAE Program Memorandum 17-2 is irrefutable. The gist of the field's call was for OCTAE to examine its interpretation limiting WIOA title II accountability in order to use the full complement of measurable skill gains. Memo 17-2 is indeed being amended by the excellent addition of MSG types 4 and 5 for IET, and the guidance does not restrict the full use of MSGs except by OCTAE's interpretation.

Memo 17-2 clearly states: *The measurable skill gains indicator is 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.*

WEI respectfully asks OCTAE

- to reconsider its restrictions on the five measurable skill gain types for all adult education participants enrolled in education or training; and
- to fix the error in interpretation of the MSG for transition to postsecondary as an exit-based measure.

Adult education has an important role to play in enabling an inclusive recovery that improves the lives of adult learners. We need OCTAE to free us from constrained thinking on adult education's limited role, so that we can best serve the people who need us.

Respectfully submitted on behalf of World Education, Inc. by Judy Mortrude

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