

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

Dear Director:

Re: Docket Number: ED–2020–SCC–0117

National Skills Coalition appreciates the opportunity to provide comments to the US Department of Education Office of Career, Technical, and Adult Education (OCTAE) regarding the Information Collection Request on the Measures and Methods for the National Reporting System (NRS) for Adult Education. NSC’s thousands of member organizations value the important role of adult education in preparing US workers for in-demand careers and helping businesses to fill talent needs.

This role has only grown more urgent in recent months, with tens of millions of Americans out of work – many of whom lack the very skills and credentials that adult education is designed to provide. Whether helping people to build much-needed digital literacy skills, improve their English language ability, or attain a high school credential, adult education is a vital tool in preparing individuals to find and keep employment in family-sustaining jobs.

The passage of the Workforce Innovation and Opportunity Act (WIOA) in 2014 marked an important milestone in strengthening investment in adult education via Title II of the legislation, also known as the Adult Education and Family Literacy Act (AEFLA). However, in the years since WIOA’s passage, it has become clear that there is more work to do to strengthen the legislation’s promise on data and accountability and improve outcomes for learners.

OCTAE’s request to the field for input comes at an opportune time. The Covid-19 pandemic has vividly illustrated the limitations of certain aspects of the NRS system, while challenging adult education providers across the country to develop new and creative approaches to the age-old challenges of data collection, assessment, and evaluation. To this end, National Skills Coalition’s recommendations are offered in the spirit of continuous improvement of the adult education system.

The importance of truly common performance measures

The WIOA statute describes the common performance requirements to be applied across each of the WIOA titles, including Title II. In particular, WIOA Sec. 116 defines Measurable Skill Gain (MSG) 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.”

Despite the clear intent of Congress as indicated by the language of the statute itself and in the Managers’ Statement that accompanied it, OCTAE has previously limited adult education programs to reporting on only a *subset* of the MSG metrics available to the other WIOA titles. This decision makes it more difficult for adult education programs to demonstrate the outcomes their learners achieve, and hampers their ability to illustrate the full value of adult education programs and services.

National Skills Coalition welcomes the step toward greater MSG reporting reflected in this ICR, but urges OCTAE to go further and allow the full range of Measurable Skill Gains to be reported for *all* learners, not simply for those enrolled in Integrated Education and Training programs. In this way, states may better illustrate the impact of their adult education programs.

Other avenues to improve AEFLA performance reporting

In addition, beyond the specific information requested in this ICR, NSC strongly urges OCTAE to engage in continued dialogue with the field about how performance reporting and accountability measures can be reimagined to better reflect current circumstances and opportunities.

For example, the rapid transition to online learning made by many AELFA-funded programs in Spring 2020 quickly illuminated the limitations of the existing NRS “distance learning” reporting category, which is vulnerable to state-specific differences in definition and interpretation. Additional conversation about how best to capture vital information about online learning within the requirements of WIOA statute and regulation is badly needed, and NSC would welcome the opportunity to participate in such conversation.

Similarly, the wholesale transition to online learning has vividly illustrated the shortcomings of a paradigm in which “pre-test/post-test” reigns supreme as *the* way to enroll, place, and evaluate learners. Not only is pre-testing sometimes impractical in a world where virtual proctoring is slow, expensive, and laborious, but pre-testing is not even necessarily appropriate for all learners. This pandemic year presents OCTAE with a golden opportunity to work with the field to analyze recent program data and experiences, understand the costs and limitations of the current model, and explore other options for high-quality evaluation and metrics. It is possible to capture important gains made by learners (such as workforce-related learning achievements) without requiring *every* learner to submit to lengthy, purely academic testing that reflects neither their accomplishments nor their employers’ priorities.

On another front, OCTAE has taken positive and important steps over the past year to spur educational institutions’ increased implementation of the Ability to Benefit (AtB) career pathway mechanism for adult learners. However, the current structure of the NRS limits and may even disincentivize the use of the powerful AtB tool, by making it more difficult for adult

education providers to receive credit for their learners' achievements. Again, OCTAE has an important opportunity to take advantage of input from the field about how assessment policy can be designed to *advance* the important goal of AtB adoption, rather than discourage it.

Finally, the issue of digital literacy has become front and center for many adult learners and employers in this pandemic-affected economy. Yet adult education providers have no way to assess digital skills using the NRS-approved standardized tests that OCTAE has pointed to as the way to gauge MSG for "workforce preparation" activities. While NSC has called for Congress to take action in establishing a national standard for occupational digital literacy,¹ in the interim it is incumbent on OCTAE to respond to the urgency of the current moment. NSC strongly encourages OCTAE to issue explicit guidance affirming providers' ability to use digital literacy assessments to demonstrate MSG for any learner.

National Skills Coalition thanks OCTAE for the opportunity to submit these recommendations. NSC and its members stand ready to participate in additional conversations on these important issues in the weeks to come.

Sincerely,

Amanda Bergson-Shilcock
Senior Fellow

¹ *Digital Skills for an Equitable Recovery* (National Skills Coalition, 2020). Viewable at: <https://www.nationalskillscoalition.org/resources/publications/file/Digital-Skills-for-an-Equitable-Recovery-web.pdf>