1) Measurable Skill Gains, as currently configured, are too narrow. They focus primarily on narrow academic gains, transition to higher ed, and employment. There are many other measures of progress and success that are equally important, such as civic participation, the ability to think and reason critically, and information literacy.

Recommendation: There should be multiple measures and opportunities for learners to gain and demonstrate the skills they need to live safe, healthy, economically empowered, and participatory lives. The types of measures used to assess student progress need to be significantly broadened. However, this needs to be accomplished without unduly burdening programs with ever more complex testing requirements.

2) Digital literacy is included in WIOA. There is no approved assessment to obtain an MSG in digital literacy, for ABE. However, digital literacy has become the default “first class” all adult learners must master during the pandemic and will most likely remain a crucial component for the future, even though it cannot be reported as an academic skill measured by commercial NRS-approved tests. While there are very effective and widely used objective assessments for digital literacy, such as Northstar Digital Literacy, the limits of the NRS prevent these outcomes from being reported via ABE (even though they could be through other MSG types and are reported by programs under other Titles). These skills are becoming more and more essential in programs nationally but are lost in ABE reporting.

Recommendation: Digital literacy gains need to be captured and measured by approved tests.

3) Table 4C does not adequately measure distance learner learning gains. The limited way in which DL learners are defined (such as learners with at least 50% of their time spent in DL), does not accurately capture the actual, diverse learning gains of learners completing some of their educational work online.

Recommendation: As recommended by the EdTech Center@World Education, 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%) relative to in person learning. 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 digital learning solutions for our participants.

4) The way in which MSGs are calculated is inequitable. Two important issues:
   a) It does not make sense to establish a ‘universe’ of learners included in a denominator (i.e., participants with 12 hours or more of service), yet base the goal (the numerator) only on those learners who have completed 40+ hours of educational services.
   b) It is counterproductive to allow only one MSG per learner in a reporting period. If a learner accomplishes two MSGs, which sometimes happens, this would appear to be evidence of an effective program, yet is not counted as an outcome.

Recommendation: The MSG expectation, and measurement of this goal, should be based on the same total universe (number of learners), rather than requiring only a subset of the denominator to be tested and allowed to contribute to the MSG.
Recommendation: Multiple MSGs should be allowable for individual students in a given reporting period.