



The Honorable Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Submitted via Federal eRulemaking Portal

Re: Docket No.: ED-2023-SCC-0034 Measuring Educational Gain in the National Reporting System for Adult Education

AGENCY: ED-OCTAE; OMB CONTROL NUMBER: 1830-0567; ICR REFERENCE NUMBER: 202302-1830-001

July 13, 2023

Dear Secretary Cardona:

We appreciate the opportunity to comment regarding Docket No.: ED-2023-SCC-0034 Measuring Educational Gain in the National Reporting System for Adult Education, and specifically the following issues: how might the Department enhance the quality, utility, and clarity of the information to be collected; and how might the Department minimize the burden of this collection on the respondents, including through the use of information technology.

Rio Salado College, headquartered in Tempe, Arizona, was established in 1978 by the Maricopa County Community College District (MCCCD) to serve nontraditional students at a distance. Over forty years later, RSC is one of the largest of the 10 colleges that comprise the MCCCD both in terms of headcount and full-time student equivalent. RSC has offered adult education services to the community since its inception, and is the largest adult education provider in Arizona. RSC partners with ARIZONA@WORK, other Maricopa Community Colleges, community organizations, and employers to create pathways to college and careers for adult learners in Maricopa County. The Arizona Department of Education named RSC as the Arizona Adult Education Program of the Year for three years in a row, 2018, 2019, and 2020.

Based on its extensive experience in Adult Education, RSC encourages ED to **enhance the quality, utility, and clarity** of students' educational progress in the National Reporting System (NRS) for adult education through the following changes:

1. Populate all Measurable Skill Gains (MSGs) learners achieve in a year on Federal Tables (i.e., 3, 4, 4B) to fully reflect the impact of adult education programs with ED.



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- Allow programs to reflect stackable progression for learners over a fiscal year by counting multiple MSGs towards outcomes (e.g., recognize advancements, not only one MSG).
- Enhance the NRS information technology system to record each progress point for a learner.
- 2. Recognize learners' MSG progress outside the Test of Adult Basic Education (TABE) assessment, High School Equivalency diploma attainment, and Integrated Education and Training metrics.
 - Allow programs to record MSGs for GED® ready testing scores, passing a section of the GED® test, earning 21st-century skills badging, or passing a digital literacy assessment.
 - These options reflect students' upskilling and learning through standardized testing and show incremental progress in developing academic and workforce skills.
- 3. Improve the existing TABE assessment or consider alternative assessments that take a more equity-driven approach and provide more relevant information to prepare learners and drive instructional interventions.
 - Improve the TABE product to align more closely with the GED® test and offer more robust study plans and resources for instructors to use with learners to improve specific skills.
 - Consider alternative assessments to record an official MSG (e.g., GED® Ready, individual GED® tests passed, and provider-identified summative assessments at course end).

ED can **minimize the burden of data collection** for adult education providers by reducing the:

1. Frequency requirements to administer TABE assessments.
 - Consider using program providers' expertise to determine the time between tests.
 - Remove the progress testing requirement after a student earns the first MSG in the fiscal year.
2. Cost of TABE units.
 - Reduce the cost of TABE units for programs to allocate resources to direct student services.
 - Cover unlimited use of TABE units for program providers.
3. Amount of content material in each test section.
 - Consider how the length of each test unit creates scheduling challenges for providers and barriers for testers.
4. System requirements for setting up testing sessions and monitoring learners for progress testing.
 - Automate test administration systems to reduce manual processes that leave room for error and require excessive staff time and resources
 - i. Auto identification of test form and level
 - ii. Auto-match learner records between DRC INSIGHT™ and the Arizona Adult Education Data Management System



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We are hopeful that consideration of these recommendations will assist ED in achieving its goal of enhancing the quality, utility, and clarity of the information to be collected for measuring gains in Adult Education while minimizing the burden of collection.

I welcome the opportunity to meet with ED to further discuss these options and our experiences over the last forty years as recognized leaders in providing Adult Education.

Sincerely,

Dr. Kate Smith

