

Author Full Name : Rebecca Horowitz**Received Date :** 07/17/2023 04:57 PM**Comments Received :**

Juliana Pearson
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Dear Ms. Pearson,

Docket No.: ED-2023-SCC-0034

My name is Rebecca Horowitz and as Assistant Director of an Adult Education program in New York, I am writing today to share my thoughts relating to the Department of Education's Office of Career, Technical and Adult Education's (OCTAE) comment request on Measuring Educational Gain in the National Reporting System (NRS) for Adult Education. First and foremost, the NRS is an outdated reporting system that does not fully capture or accurately reflect the number of participants that adult education programs serve on a year-to-year basis or the skills that adult learners gain from their participation in these programs. That is why we are urging the establishment of a pilot program to test out innovative accountability system approaches that can help determine the best ways to measure the performance of adult education learners and adult education programs. This pilot system has been proposed by Senators Jack Reed (D-RI) and Todd Young (R-IN) in their Adult Education WORKS Act, which was developed with the input of adult education program directors, educators and learners.

The NRS is a needlessly complicated accountability system that relies on standardized testing, only one data point as a measure of student progress. The overly complex system of gains and testing for adult students presents an unnecessary burden of paperwork and data collection on adult education programs, which are already struggling financially. Without robust information and data management technology, the requirement to document all data on paper, this burden is exponentially magnified, an absurd problem to have in 2023.

Additionally, there is a discrepancy between NRS adult education enrollment data and State-level adult education enrollment data due to the fact that the NRS requires that learners receive 12 hours of instruction in order to be counted as a participant. There are many instances where learners receive services from a program under 12 hours. This can be the case when a learner enters an adult education program to gain a certain skill, attains it and then leaves due to a new work opportunity. Similarly, there are many instances where a student makes gains earlier than they're allowed to post test.

Additionally, adult education programs provide learners with a variety of skills not captured in the NRS, such as digital literacy skills and information literacy skills, that are necessary for success in the modern economy. By not allowing programs to demonstrate gains in these kinds of skills, policymakers at the Federal level do not have a comprehensive understanding of the services that adult education programs provide learners.

In sum, I urge that OCTAE enhance the quality, utility, and clarity of the information to be collected by focusing greater attention on reporting requirements that more appropriately and effectively measure the progress and performance of adult education programs and their participants. Implementing a pilot to test out innovative approaches to accountability systems for adult education would improve the NRS so it captures education growth and achievement by adult learners and the impact of adult education programs.

Thank you for your attention to and consideration of my recommendation.

Rebecca Horowitz