

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 Sherri Fujita and as the Dean of Instruction of Adult Education at Spokane Community College, 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.

Because of the current NRS system of reporting is outdated and ineffectual, I would like to request the establishment of a pilot program to test out innovative accountability system approaches that can help determine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 does not accurately reflect the number of participants that adult education programs serve on a year-to-year basis or fully capture the skills that adult learners gain from their participation in these programs.

I work at a community college in the state of Washington. The college is accredited by the Northwest Commission on Colleges and Universities (NWCCU) which is recognized by the United States Department of Education (USDE) and the Council on Higher Education Accreditation (CHEA) to accredit postsecondary institutions. Just as credit courses for which Federal Financial Aid is available, we place and assess our students using locally developed placement tools grounded in student learning outcomes, grades, and a cycle of continuous improvement which includes rigorous program reviews and assessment. Courses offered in the division of Adult Basic Education are vetted and approved by the college's Curriculum Committee. The courses are aligned with NRS levels and descriptors in "Appendix B: New Educational Functioning Level Descriptors for Adult Education and English as a Second Language." I don't understand why students in Adult Education programs are treated differently from students receiving federal financial aid when they are being taught in the same regionally accredited institution.

The mandate to use an inaccurate and flawed standardized test, which in Washington State is the CASAS test, means that we use a significant amount of funding to pay for testing materials, and to administer the test. This cost can be measured in dollars as well as in time wasted for our students, faculty and staff which could be better spent on learning. Because the approved tests are so inaccurate, it forces programs to test students twice using local assessments to accurately track and measure student progress.

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.

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.

For the above reasons, I urge OCTAE to 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.

Sincerely,

Sherri Fujita, Ed.D.

Dean of Instruction - Adult Education Division  
Spokane Community College  
1810 N. Greene Street  
MS 2064  
Spokane, WA 99217