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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 James Albee and as a teacher in the Adult Academic Program of Robbinsdale Area Schools, Crystal, MN, 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 First and foremost, the NRS is an outdated reporting system that does not fully capture or accurately reflect the number of participants that adult education programs serve on a year-to-year basis or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 antiquated in many ways, including the need to record students as active at 12 hours but not being able to posttest them until 40 hours. This leaves a gap that many of our students can fall into, leaving the program with unfunded hours of contact and lower than accurate level gains. If a student is able to prepare for a HSE test in less than 12 hours and is not included as a student or if it takes them more than 12 hours but less than 40 hours, and passes that HSE battery, should not that student have shown a gain?

The NRS is also pegged to just a few tests that may not give a full accounting of gains that a student may make. 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.

Sincerely,

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