

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 Karyn Ruiz and as a GED instructor at Visalia Adult School in the Central Valley of California, 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.

NRS is an outdated reporting system that does not fully capture or accurately reflect the number of participants that adult education programs serve on a year-to-year basis or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 believe it is urgent for a pilot program to be established that will 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.

I have taught both GED and high school diploma classes throughout my 18 years as an educator at our adult school. In my roles as educator, data analyst, and accreditation coordinator, it is very frustrating to see our students make extraordinary gains that are not recognized by the NRS. The current system only counts measurable skills gains (MSGs) from students who have completed their GEDs or earned a high school diploma. This means that a student who passes three of the four GED tests in a month but doesn't finish before July 1st is counted as not earning an MSG unless they have made a score increase on their NRS-approved benchmark. It also means that a student who completes two years of high school credits in one school year (four semesters with six classes each for a total of 24 classes) can only earn one MSG for their NRS-level increase on a benchmark exam. I believe the MSGs counted by the NRS should reflect a student's achievements over-time and based on their work within their program – percentage of HSE exams passed, and percentage of high school credits earned.

Additionally, there is a discrepancy between NRS adult education enrollment data and State-level adult education enrollment data since the NRS requires that learners receive 12 hours of instruction to be counted as a participant. There are many instances where learners receive services from a program under 12 hours. In fact, many programs would offer targeted, short-term classes like "Using Gmail" that wouldn't require long-term attendance requirements. With adult students, 12 hours can be a long-term commitment – six weeks of a two-hour class on Monday afternoons, or 12 weeks of an hour long class on Wednesday nights. By either eliminating or reducing the instructional hour requirement, more students can be designated as active participants, particularly if they've gained the required skills while enrolled in their program and then they can leave due to a newly available work opportunity.

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.

Sincerely,
Karyn Crowe Ruiz