

LITERACY VOLUNTEERS
of MASSACHUSETTS



10 Post Office Square – Suite 800 South · Boston, MA 02109 · TELEPHONE: 617.367.1313 · www.lvm.org

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July 21, 2023

Juliana Pearson

Office of Planning, Evaluation and Policy Development

U.S. Department of Education

400 Maryland Ave. SW

Washington, DC 20202

RE: Docket No.: ED-2023-SCC-0034

Dear Ms. Pearson:

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On behalf of Literacy Volunteers of Massachusetts, Inc. (LVM), I am writing today to share comments relative 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.

LVM, established in 1972, is a private, nonprofit adult education program that trains volunteers to provide free, confidential, and individualized tutoring to adults in basic literacy and ESOL. Pre-COVID, LVM served nearly 1000 adults each year. Since 1976, LVM has been funded by the Massachusetts Department of Elementary and Secondary Education which administers federal and state adult education funds through a competitive grant application process.

LVM supports the pilot program 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. This pilot would be “an innovative performance accountability system that uses alternative indicators of performance that have the potential to more accurately reflect the objectives and adult education and literacy activities of the eligible providers’ programs.”

The NRS is a limited and outdated system that does not fully capture or accurately reflect the number of participants that adult education programs serve on a year-to-year basis, the skills that adult learners gain from their participation in these programs, or the learners’ important achievements as a result of their participation.

By intentionally restricting “who counts” and “what counts” in data reporting, the NRS prevents programs from conveying the full impact of adult education instruction on the lives and families of adult learners as well as on their communities. As a result, policymakers are missing what really happens in adult education programs; the services that are really provided; the full array of educational, employment and personal goals that are really achieved, and the skill gains that are actually made.

This unfortunate discrepancy is acutely unfair to students who are at the lower skill levels, especially ABE students who struggle with learning differences and whose hard-earned achievements are nowhere on the list of NRS reportable gains. These adults are listed as a priority population that is “most in need” of adult education and literacy services as stated in the Workforce Innovation and Opportunity Act (WIOA), Section 231(e)(1)(B)(i)(ii), yet they are nevertheless put at a disadvantage. **When programs cannot report their inherently slower and more incremental progress on goals because they don’t count under NRS, programs choose to serve other populations instead.**

I strongly 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 the real education growth and achievement by adult learners and the true impact of adult education programs.

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

Sincerely,



Roberta Soolman
Executive Director