

July 21, 2023

Attn: Juliana Pearson  
PRA Coordinator Strategic Collections and Clearance  
Governance and Strategy Division, Office of Chief Data Officer  
Office of Planning, Evaluation, and Policy Development

RE: *OMB Control Number: 1830–0567*

Submitted via [Public Comment Link](#)

To Ms Pearson::

World Education (WE), a division of JSI, appreciates the opportunity to provide comments to the U.S. Department of Education regarding *Measuring Educational Gain in the National Reporting System (NRS) for Adult Education*. We acknowledge that this comment opportunity is seeking responses to an extension without change of a currently approved NRS information collection. However, we would urge the Department's, Office of Career, Technical, and Adult Education (OCTAE) to take this opportunity to improve NRS guidance and reporting on learner participation in distance education in order to better understand use of the various modes of instruction used in WIOA-funded programs.

Our response below is based on our vast experience managing technical assistance (TA) for adult education leadership through the Innovating Digital Education for Adult Learners (IDEAL) Consortium. We have helped states pivot to digital instruction during the COVID-19 pandemic, and subsequently craft policy and implement programming to make digital instruction a foundational component of state offerings- in many places this constituted a major shift in classroom practice and program delivery.

Thank you for this opportunity to respond. Please address any inquiries related to this letter to me.

Regards,



Priyanka Sharma

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PRIYANKA SHARMA | VICE PRESIDENT

**WORLD EDUCATION, INC.**

[www.worlded.org](http://www.worlded.org)

# Measuring Educational Gain in the NRS for Adult Education

## ABOUT WORLD EDUCATION

[World Education](#) (WE), a division of JSI, is a global nonprofit organization headquartered in Boston that advances equity and opportunity by improving the quality and accessibility of education for children and adults. WE is a leader in providing capacity-building services to adult education and workforce development systems in all 50 U.S. states through innovative demonstration projects, professional development, research, and targeted technical assistance.

Founded in 2015, World Education's award-winning [EdTech Center \(ETC\)](#) advances digital equity to enable everyone to thrive as learners, workers, and family and community members in the digital world. Our staff and global network of partners are experts on digital learning and lead diverse projects both in the U.S. and internationally. The EdTech Center's digital learning and educational technology (EdTech) integration work is informed and guided by a radical commitment to equity, accessibility, excellence, open access, and collaboration.

## Leading Adult Education Policy and Practice on Digital Education

Specifically, in the area of distance education policy, WE facilitates the [Innovating Digital Education for Adult Learners \(IDEAL\) Consortium](#), a supportive community of practice for state-level adult education leaders who are committed to improving learner access to quality distance education and other forms of digital instruction. Through IDEAL, WE has established a network of peer-support where effective policy is shared and adapted to fit different states' needs. IDEAL currently supports leaders from 20 states, who reached 127,935 distance learners and 461,923. *These numbers are calculated from the NRS Reports from FY2021.*

IDEAL provides:

- **A Community of Practice.** Mentoring and networking enable IDEAL members to improve blended and distance programming by learning from the experiences, triumphs and challenges of other teachers, PD leaders, and program administrators. Facilitated support is provided by subject matter experts and peer leaders across the country through both an online discussion forum and the annual IDEAL Institute.
- **Free Professional Learning for Practitioners.** EdTech Strategy Sessions are monthly webinars that convene leaders, practitioners, educators to hear short presentations on

highly relevant topics and engage with presenters and each other to share and discuss questions.

- **Professional Development Courses.** Member states have access to a professional learning pathway for their states' teachers. Topics include distance and blended learning program development, HyFlex program development and instruction, classroom technology integration, mobile learning, and digital content evaluation.
- **Consultation.** Leaders meet with IDEAL facilitators to discuss prioritized initiatives, policy shifts, and professional development plans. Through this TA, IDEAL has helped states establish distance education policies, informed states' grant process for awarding of AEFLA funding, and helped states with long-range goals to provide equitable access to digital instruction.

Informed through this work and our expertise, our comments below reflect our belief that NRS reporting requirements should shift to create opportunities for states to report data that could better inform instructional practice. Currently, there is no national data set to illustrate the efficacy of different modes of programming and instruction (i.e. blended, hybrid, hy-flex). We are currently in the process of collecting and analyzing data from a national survey written and disseminated in partnership with the National Association of State Directors of Adult Education (NASDAE). The survey explored distance education policy, modes of programming/instruction, and data collection practices. We believe that the results from the survey can inform updates to NRS reporting to better track learner participation and progress in technology-enabled instructional modes that have gained traction since the onset of the pandemic.

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## COMMENT

While OCTAE has implemented activities required in statute and regulations, provided technical assistance, and made changes to sub-regulatory guidance found in the NRS over the years since passage of the law, additional changes are needed to further or complete OCTAE's support for state and local implementation of service delivery systems under WIOA. These additional changes are necessary to support the law's purpose of increasing access and success for individuals with barriers to employment through opportunities for the employment, education, training, and support services they need to succeed in the labor market. The comments that follow focus on NRS guidelines and reporting requirements for learners enrolled in distance education.

## Changes to Reporting of Participation in Distance Education

The rush to online instruction during the COVID-19 pandemic underscored significant weaknesses within the NRS related to defining and measuring diverse modes of digital instruction (i.e. distance learning, blended/hybrid learning, and hybrid-flexible models). Current NRS assessment and participation guidance defines how states report engagement in these modes of instruction, but falls short of providing relevant data to support an understanding of their efficacy or relevance. Currently, states report learners who have participated in distance learning “for a majority of time” on Table 4C. Though this data is nationally available, they are insufficiently descriptive to inform program evaluation. Table 4C likely under-reports actual engagement in distance education because 1) not all states report distance education time, 2) states use it to report participation only for learners engaged in distance education as a majority of their time, and 3) states can define distance learning in any manner they choose - as long as it falls within the guidelines of “a majority of time”.

To facilitate a better understanding of the state of digital instruction in Adult Education and Family Literacy Act (AEFLA)-funded adult education program, we recommend the following:

1. NRS should offer standardized definitions for the different modes of digital instruction. States currently have no incentive to use shared definitions for the different ways learners engage in programming, making it impossible to get a national picture of the types of instruction provided and how learners fare within any of them.
2. NRS should offer opportunities for states to report on engagement in digital instruction beyond “a majority of.” Several states have policies and data practices that require local programs to provide more discrete categories for reporting participation. For example, Texas requires programs to report on time in the following increments: “without proxy hours,” “less than 50% proxy hours,” and “greater than 50% proxy hours.” Through such reporting, they have been able to determine that level completion is most common when learners have access to at least some proxy hours, which is valuable information used to set professional learning and policy priorities.
3. NRS should consider a means by which states report on learner digital literacy gains. Several states have implemented mechanisms to better understand and track learner progress in the area of digital literacy (i.e. Northstar Digital Literacy Assessment, CASAS COAAP Assessments, non-level gain MSGs), which has given them data to monitor progress at the state level, focus professional development priorities, and nudges reticent programs to integrate digital skills instruction into programming. More information on the need for state reporting on digital literacy gains as well as a discussion of ways to assess gains is provided in the report, [Findings from a National Scan on Adult Literacy Instruction](#) from the [Digital Resilience in the American](#)

[Workforce](#) (DRAW) initiative co-led by World Education. The project also published an accompanying paper, [Assessing and Validating Digital Skills: DRAW Detailed Findings and Discussion](#) and blog, [Selecting an Assessment for Digital Literacy](#).

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WE thanks the Office of Planning, Evaluation, and Policy Development for this opportunity to comment and welcomes the opportunity to discuss our comment and perspective further.

## CONTACTS

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