

December 20, 2023

Attention: Stephanie Valentine

PRA Coordinator - Strategic Collections and Clearance Governance and Strategy Division
Office of Chief Data Officer -Office of Planning, Evaluation and Policy Development
Reg. OMB Control Number 1830-0027

Dear Ms. Valentine:

World Education (WE) - a division of JSI - appreciates the opportunity to provide additional comments to the US Department of Education request on *Measures and Methods for the National Reporting System for Adult Education* (Docket Number: ED-2023-SCC-0141).

WE applauds Assistant Secretary Amy Loyd's vision for a modernized adult education system that values the multiple ways to demonstrate and document learning. WE wishes to emphasize our gratitude for some of OCTAE's decisions and to offer these follow up comments in order to strengthen that vision through clear guidance.

- We strongly support adding Alternative ABE and ESL Placement to key tables and the inclusion of the footnote clearly calling for participants with alternative placement to be removed from the post-test denominator when calculating the state's post-test rate. This innovation from Rhode Island's adult education leadership is forward thinking and noting it prominently here on Table 1 will support other innovative leaders.
- We note that Table 4A contains a typographical error by including Alternative ABE Placement in the spot where Alternative ESL Placement should be.
- WE strongly values the use of the MSG numbering system throughout the tables and hopes the technical assistance that will accompany this new guidance will continue to build the field's understanding and use of all the learning measurements within the MSG system.
- WE strongly supports OCTAE's response: "...the State, at its sole discretion, may identify the programs that are designed to yield outcomes other than MSG type 1a....The examples provided in the Supporting Statement of programs covered by this flexibility are not exhaustive and are for illustration purposes only. OCTAE cannot anticipate the array of possible names for programs designed to yield outcomes other than MSG type 1a." However, it is unclear where to report these learning gains as Table 4, Columns G and N (and accompanying footnotes) continue to limit the reporting of

MSG types 3-5 to IET or workplace literacy participants. Where are the participants of other programs designed to utilize these learning measurement types to be recorded? The same is true for Table 4c, Columns G and N, and then the problem cascades throughout the tables as footnotes send people back to Table 4 to capture MSG data (Tables 8, 9, 10). Redefining these columns and Table 11 to capture all MSGs for anyone participating in programs designed to yield outcomes other than MSG type 1a would provide a comprehensive look into state use of the flexibility OCTAE is granting. Conversely, providing no way to document these learning gains for participants of programs, outside of IET and workplace literacy, designed to yield outcomes other than MSG type 1a is a major disincentive to providing such programming. A flexibility without accountability will not be utilized. While OCTAE leaves the design of these programs to the sole discretion of states, OCTAE could provide some minimal guidance by renaming these columns “**Number of High School or College and Career Preparation Program participants who achieved an MSG via transcript, milestones, or exam.**” Table 11, then, could become a table explicitly for the purpose of documenting the outcome of these programs designed to measure learning via MSG types 3-5.

- WE appreciates the clarification that state assessment policy is restricted solely to 1a documentation, but strongly encourages OCTAE to put a guidance note into the NRS tables for states to create a state policy - outside of the required assessment policy - for local programs on the design, implementation, and documentation of learning measurement within programs designed to use non MSG type 1a learning measurement. WE also encourages OCTAE to provide technical assistance and support to early adopters of this innovative flexibility.
- WE appreciates the inclusion of the IET footnote on Table 1 but finds it confusing. Clearly **Workforce preparation activities** do not exist only within IET. While workforce preparation is one of the three core components of integrated education and training, **workforce preparation activities** is also contained within definition of adult education and literacy (34 CFR § 463.30):

The term “adult education and literacy activities” means programs, activities, and services that include:

- a. Adult education,
- b. Literacy,
- c. Workplace adult education and literacy activities,
- d. Family literacy activities,
- e. English language acquisition activities,
- f. Integrated English literacy and civics education,

- g. Workforce preparation activities, or
- h. Integrated education and training.
(Authority: 29 U.S.C. 3272(2))

as well as fully defined within WIOA (34 CFR § 463.34):

Workforce preparation activities include activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in:

- a. Utilizing resources;
- b. Using information;
- c. Working with others;
- d. Understanding systems;
- e. Skills necessary for successful transition into and completion of postsecondary education or training, or employment; and
- f. Other employability skills that increase an individual's preparation for the workforce.

(Authority: 29 U.S.C. 3272(17); P.L. 111–340)

A stellar example of operationalizing this definition can be seen in Minnesota's Academic, Career, Employability Skills Transition Integration Framework ([ACES TIF](#)) which is built into Minnesota Adult Education standards.

OCTAE's comment, "the instructions on Table 1 have been revised to provide the definition of IET programs which encompass workforce preparation activities that help participants acquire a combination of skills, including digital literacy skills." We anticipate that the explicit naming of "digital literacy skills" in the context of the alternative EFL placement instructions will encourage states to consider how the attainment of such skills may be measured and reported. However, it is important to note that "workforce preparation activities must be provided concurrently and contextually with adult education and literacy activities and workforce training in an IET program - not as stand-alone activities" acknowledges workforce preparation's role in IET but fails to also note that workforce preparation activities are a defined AEFLA activity. Failure to correct this omission could lead practitioners to believe workforce preparation activities - as defined in WIOA - are only valued within IET, which would be a misinterpretation and a disservice. OCTAE may also wish, at the same time, to clearly articulate the difference between 'career services' such as resume writing and job search - which are reported on the Statewide Performance Report - and the much more comprehensive workforce preparation activities definition.

Thank you for the opportunity to weigh in on these important issues. World Education remains committed to working with all stakeholders to strengthen educational and economic outcomes for all learners.

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