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**U.S. Department of Education Regulations Proposal Docket #ED-2016-ICCD-0104
Agency Information Collection Activities; Measures and Methods for the National
Reporting System (NRS) for Adult Education**

Comment from United Neighborhood Houses of New York
November 28, 2016

United Neighborhood Houses of New York (UNH) is the association of 38 settlement houses and community centers in New York City that collectively serve 500,000+ New Yorkers at over 600 sites across the five boroughs annually. Our member settlement houses are non-profit, neighborhood-based, multi-service providers that offer a range of activities including, but not limited to: early childhood education, afterschool and youth employment, adult education, workforce development and older adult services, health, behavioral health and substance abuse services, homelessness & homelessness prevention services and affordable housing development.

With over 2.2 million New Yorkers lacking a high school diploma and/or English proficiency, our network's adult education and workforce development programs are an essential part of our approach to helping individuals and families build self-sufficiency. As non-profit organizations, our members deliver these services primarily through public dollars that originate at the local, state and federal levels, with federal funding—represented by WIOA—comprising the largest share. In particular, WIOA Title II dollars are an essential source of support for our adult education programs. With such a high proportion of adults in New York's adult education and workforce development systems lacking English proficiency and/or a high school diploma, our services are primarily targeted at these learners at the lowest levels. Further, a significant number of these individuals lack a Social Security Number (SSN). Preserving our ability to serve these New Yorkers in greatest need of services is a high priority for our network and the adult-education services community at-large.

The Education Department's (ED) proposed changes to the NRS information collection activities represent a partial step in the right direction. While we welcome the reporting elements proposed in relation to employment survey data (2nd & 4th quarter employment status; broad estimate of salary), we are concerned that these options add to, rather than replace, the existing reporting elements. We recommend that these proposed employment reporting outcomes be adopted as the only survey data elements required primarily for two reasons: 1) These outcomes allow for a greater flexibility in serving adult learners in need of service, and 2) Adding additional reporting outcomes without any commensurate increase in resources places an undue burden on providers and ultimately will divert time and attention away from quality programing instead toward data tracking and reporting.

Thank you for your consideration of these comments. Questions may be directed to Kevin Douglas, Co-Director of Policy & Advocacy, at kdouglas@unhny.org