

Texas Workforce Commission

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U.S. Department of Education
400 Maryland Avenue SW
LBJ Room 2E-349
Washington, DC
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Docket ID ED-2016-ICCD-0104

RE: Comments on the Proposed Measures and Methods for the National Reporting System (NRS) for Adult Education

Staff of the Texas Workforce Commission (TWC) appreciate the opportunity to comment on the draft proposal to modify the National Reporting System for Adult Education published in the September 27, 2016 Federal Register by the Department of Education (ED), Office of Career, Technical, and Adult Education (OCTAE).

As discussed in further detail in our attached comments, TWC's review of the proposal was made more difficult by limited documentation within the proposal and unclear explanation of how the NRS is to be used within the broader WIOA performance accountability framework.

OCTAE characterized the proposed changes as "nonsubstantive" and thus not requiring a modification to the handbook. WIOA made dramatic, fundamental changes to performance accountability in the national workforce system, including the Title II program. Indeed, WIOA's performance accountability changes probably impact the Adult Education and Family Literacy Act (AEFLA) programs under Title II more than any of the other core programs besides Title IV Vocational Rehabilitation.

If the NRS is intended to be a standalone, supplemental set of data that OCTAE uses to monitor system performance in addition to the 9169 state

annual report, then it is possible (though probably ill-advised) to have the NRS use different specifications than the 9169 without violating WIOA §116's requirement to use common measures and common reporting specifications for the performance accountability system. However, if the intent is that the data on the NRS tables be OCTAE's primary means of reviewing performance results and determining whether a state has met expectations or not, WIOA §116 requires that the common measures and reporting specifications from the WIOA accountability system are included in the NRS and that they fully comply with the standards jointly developed by the Secretaries of Education and Labor, which they clearly do not now.

Rather than potentially confusing AEFLA operators and other stakeholders, we recommend that OCTAE fully align the NRS with the common measures and 9169 specifications and then building on those constructs by creating the additional groupings (such as EFLs) and levels of detail that they require to more fully evaluate and report on the program. Support for this recommendation is contained within the attached comment document, which also identifies other less global recommendations.

Thank you again for the opportunity to comment on this proposal. If you have any questions about these comments, please contact Adam Leonard at adam.leonard@twc.state.tx.us or (512) 936-5866.

Sincerely,



Larry Temple
Executive Director

cc:

Andres Alcantar, Chairman and Commissioner Representing the Public
Ruth Ruggero Hughs, Commissioner Representing Employers
Julian Alvarez, Commissioner Representing Labor

INTRODUCTION

TWC staff are concerned that subsequent to the Department of Education's Office of Career, Technical, and Adult Education (OCTAE) publishing the draft NRS tables for public comment, it communicated that decisions had already been made to make modifications to those tables based on public comment received early in the comment process. This information was communicated during an OCTAE training session held in late October 2016 with their partner the American Institutes for Research (AIR). Confusing the matter further was that the tables that OCTAE/AIR were focusing on during this training were tables to be used for PY16 reporting, for which changes had already been made to those originally released on July 30; the tables out for public comment are those proposed to be used for PY17 and beyond. So, while it sounds like some of the changes displayed in the training materials will be made to the final PY17 NRS tables, we were unable to be certain which might be included. There are substantial differences between the PY16 tables originally released in the summer and used in earlier training and those used in the October training, which are the PY17 tables published for 60 day public comment.

Further complicating our review was the fact that the draft NRS tables contain minimal descriptions of the requirements. There is no narrative. There is little guidance regarding how to calculate each cell in the tables. There is even less of a connection to the WIOA Joint Reporting specifications for those report elements that should be governed by those specifications under WIOA §116. That makes it impossible to be certain exactly what OCTAE is proposing to be reported in some instances – for it is in the detailed definitions where the real requirements will be communicated, not in the generic column and row labels.

While it is true that the manner in which OCTAE documented many aspects of the draft tables is consistent with what was been used in old, pre-WIOA NRS tables, the old NRS had an extensive handbook which provided a great deal of information to help users understand what was expected and how to comply with it. The draft tables have no such accompanying guide. Without one or other such documentation, TWC staff and other stakeholders were left with a less clear picture of what the proposal actually was. As such, these comments may be arguing in favor of things that OCTAE is actually proposing, but which commenters were unclear on due to limited

documentation in the proposal. Given that OCTAE has indicated that this material will be put out for an additional 30 comment period after it has reviewed and address comments on this proposal, TWC staff recommend that the 30 day ICR proposal include an updated NRS handbook that fully lays out OCTAE's expectations, so that commenters can better understand what is proposed and provide more focused comments.

GENERAL COMMENTS ABOUT THE ROLE OF THE NRS RELATIVE TO THE COMMON WIOA REPORTING REQUIREMENTS

WIOA included a number of important performance accountability provisions that were intended to better align the core programs. WIOA §116(b) specifically identifies Common Measures to be applied to all six WIOA Core Programs and identifies only two specific exceptions:

- 1) The Credential Rate and Measureable Skills Gain measures are not used in the Title III Wagner-Peyser program; and
- 2) The two "post-exit employment" measures are replaced with measures that focus on either post-exit employment or enrollment in education for the Title I Youth program.

Clearly, the authors of WIOA believed that there were some areas of performance accountability that were not "fully common" to all programs when they explicitly included these exceptions in WIOA §116(b). If they had believed that other such exceptions were appropriate, they could have included them in §116 or could have authorized the Secretaries to identify further areas of uncommonness through regulations or the performance reporting specifications, but they did not. As such, it is quite clear that the common measures listed in WIOA §116(b)(i) are to be universally applied to Title I Adult, Dislocated Worker, Title II AEFLA, and Title IV participants according to common definitions and reporting requirements developed jointly by the Secretaries under WIOA §116(d).

As indicated in comments TWC made previously on draft WIOA regulations and ICRs, TWC has a great deal of experience applying common measures across state and federal programs as WIOA now requires. TWC initially implemented the Bush Administration's Common Measures across all of its

staff and federally-funded workforce development programs a decade ago¹. Through the implementation of common measures and common reporting requirements, TWC was able to remove barriers to integration of services within the Texas Workforce System, as well as simplify performance accountability. As such, TWC has ardently opposed any proposals it saw as potentially weakening WIOA §116's requirements to apply common measures to the six core programs and requirements for those programs to be reported using common report specifications.

It is through this lens that TWC staff have evaluated OCTAE's draft NRS tables and related reporting guidance communicated by OCTAE staff. As identified in the following comments, that review revealed inconsistencies between OCTAE's NRS reporting instructions and the joint performance reporting specifications adopted by the Secretaries and published in June of 2016.

To the degree that the data reported in accordance with these joint specifications through the 9169 will be the data used for performance accountability, any disconnect between NRS and the 9169 is regrettable, but does not undermine the intent of WIOA §116.

To be clear, TWC understands that there are inherent differences between the programs and the populations they serve and therefore supports the needs of the departments to obtain additional, program-specific data (subject to reasonable limits) as long as these supplemental sets of data are just supplemental in nature. To the degree that these supplemental reports (whether ETA's 9173 or OCTAE's NRS) are planned to be used in performance accountability, they must completely follow the 9169's specifications. That is, it is okay if the 9173 or NRS contain performance data also contained on the 9169, but perhaps broken out in different ways or for different subpopulations but the underlying core logic behind each numerator and denominator must follow the 9169. If they do not, they cannot be used in the performance accountability process to determine whether a state has met or failed to meet WIOA performance expectations.

¹ Federal programs included DOL's WIA, Wagner-Peyser, JVSG, and TAA Programs, HHS' TANF program, and the Department of Agriculture's SNAP E&T program. TWC had planned on implementing the Common Measures in Adult Education before WIOA passed and brought with it a new set of common measures.

Heretofore, TWC has not objected to OCTAE's proposal to continue using the NRS for Title II reporting – we saw it as a supplemental source of information for OCTAE to use to monitor and evaluate Title II. However, during the Title II training session in late October, OCTAE staff explained that their plan was to have the NRS tables populate elements in the 9169 Joint Performance Report. Because TWC has found several important areas in which OCTAE proposed NRS calculations do not comport to the 9169 Joint Specifications, TWC staff objects to this proposal as described by OCTAE staff and recommends that OCTAE either:

- 1) Completely disconnect the 9169 from the NRS tables so that states are able to file their 9169 in full accordance with jointly approved specifications; or
- 2) Redesign the NRS to fully follow the 9169 specifications².

While OCTAE may not be planning to create a means for states to submit Participant Individual Record Layout files for Title II and have a central system perform the calculations necessary to produce the 9169, states and providers may choose to create such a system or want to buy software made by a third party to do so. This is particularly likely to be popular for states that operate multiple core programs. A program that can produce a 9169 for Title I needs only one minor modification to produce a Title II 9169 (it would just need to select for Title II participation rather than Title I) and that is what TWC is developing for all our programs.

INCONSISTENCIES BETWEEN THE COMMON MEASURES AS OUTLINED IN THE 9169 JOINT REPORT SPECIFICATIONS AND OCTAE'S PROPOSED NRS TABLES

Counting Credentials for IET Participants, but not as MSG

The draft NRS as published only counts postsecondary credentials achieved if the Participant was enrolled in Integrated Education & Training (IET). However, the Joint Report Specifications for this measure includes anybody in secondary or post-secondary education during program participation. That means that a state reporting in accordance with the 9169 specifications would report different numbers in the 9169 than what NRS requires to be

² Specific instances of inconsistencies between the NRS and 9169 are discussed later in these comments.

reported assuming they had any Participants who were in AEFLA and a non-IET post-secondary education program.

OCTAE staff at the October training indicated that another commenter had already raised this issue and OCTAE planned to make a change to not require post-secondary credentials to be tied to participation in IET in a subsequent NRS ICR. TWC staff support following the 9169 reporting specifications, but will need to review the proposed amendment to determine if OCTAE's new NRS proposal addresses all of our concerns.

While much of the messaging about WIOA has been the notion of greater coordination and coenrollment between programs, the real importance of WIOA is that through the use of Common Measures and mandating greater partnerships, WIOA seeks to move from a "program" model to a "system" model with the customers at its focus. That means that programs are but a means to fund services that the customer needs.

There are instances where a participant might be in some kind of post-secondary occupational training (whether funded by Title I, Title II, Title IV, another WIOA Partner Program or a completely different funding mechanism) and realize that they need additional help with math or reading to help them complete that post-secondary coursework. By not limiting the Credential Rate to only IET, states are able to measure and report on the impact that Title II had both on traditional Title II students, who are in general AEFLA services or seeking their high school equivalency (HSE) or diploma, and other students who may attempt to enroll or succeed in post-secondary education or training and turn to AEFLA services to develop sufficient literacy skills, or a HSE to support the career pathway they are following.

Given that OCTAE staff indicated they realized that their NRS instructions for the Credential Rate needed to be modified to account for achievement of post-secondary credentials achieved outside of an IET, we are baffled as to why they would come to the same conclusion on Measureable Skills Gain (MSG).

Under the 9169' joint reporting specifications approved by the Secretaries of Education and Labor as required by WIOA §116, a MSG can be demonstrated in one of 5 different ways. Those specifications do not differentiate between programs and yet OCTAE's proposed NRS specifications only allow gains in 2

areas to be reported: an Educational Functioning Level gain (EFL) and Achievement of a Diploma/Equivalent. Again, while TWC does not begrudge OCTAE's interest in these 2 types of gains and recognizes that the vast majority of those Title II participants who achieve gains will likely do so through one of these two means, it is possible that some, perhaps many, will achieve one of the other types of gains.

When it came to the credential rate, OCTAE acknowledges that Title II-funded services might lead to a credential not awarded directly by the Title II program and yet understood the role that Title II was playing in that achievement and plans to ensure that the accountability can reflect that achievement. The exact same logic can be applied to MSG where the Title II services help the individual make other gains that are not reflected in the form of an EFL gain or Secondary Diploma/Equivalent. Consider this: a post-secondary credential achieved outside of an IET can be reported in the Credential Measure under OCTAE's revised thinking, but that same achievement would not be considered an MSG even though achievement of a post-secondary credential is one of the 5 ways that a MSG can be demonstrated in the 9169 report specifications!

Counting all Five MSG's

In addition, one of the more popular AEFLA programs for employers is the Work-Based Project Learner program that generally involves incumbent workers with basic skills deficiencies attending a short-term AEFLA course that focuses on specific basic skills that the employer needs their workers to possess in order to do their jobs effectively or advance. These classes are generally not intended to result in a pre/post gain or diploma/equivalent and, because they last 12 to 30 hours, cannot result in an EFL. However, these participants could show learning gains under the MSG "passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams," which is similar to the way the Work-Based Project Learner activity was measured in previous NRS guidance, which stated: "The assessment must employ a standardized test or be a performance-based assessment with standardized scoring rubrics." This would also promote partnerships with and services to employers, which is one of WIOA's goals.

Under the Joint Performance Specifications, these participants are included in the MSG measure denominator and can achieve gains that count in the numerator. However, under OCTAE's proposed NRS tables for MSG, they would not have an opportunity to be included in the numerator. This is yet another example of the NRS not being aligned with the 9169 specifications. When TWC creates an AEFLA PIRL in accordance with the Joint PIRL specifications and runs it through the 9169 Joint Report logic, participants in work-based AEFLA programs who achieved any of the 5 types of gains that are recognized under the MSG specification will be included in the 9169 numerator.

MSG Reporting Across Periods of Participation and Multi-Year Periods of Participation

Still another area of misalignment between the 9169 specifications and the NRS tables as related to MSG reporting has to do with reporting a participant in multiple years assuming that the participant has a period of participation (POP) which crosses over program years. Under the PIRL instructions, states create one row for each Period of Participation a Participant has and a Period of Participation begins upon the date the person becomes a participant (which means upon receipt of 12+ contact hours for AEFLA) and continues until Exit (which occurs when the Participant goes more than 90 days without service and this 90 period was not part of a planned gap in services with a plan to return for further service at a specific point in time in the future). Therefore, under the Joint PIRL specifications if a person becomes an AEFLA Participant on January 1, 2017 and continued to receive services until July 2, 2017, at which time they completed services and were to exit, we would report that person in the PY16 and PY17 PIRLs with a single period of participation as their POP began in PY16 and did not end until PY17. When we run those PIRLs through the 9169 Joint Specification logic, that Participant would be included in the MSG denominator in each of the two years. This is not a policy issue – it is a logic issue. The MSG denominator specification states that:

Count of UNIQUE RECORDS Where (Funding Stream) and ((DATE OF PROGRAM ENTRY is not null) and (DATE OF PARTICIPATION³ <= end of report period) and (DATE OF EXIT is null or within the report period)

³ Discussion with DOL staff indicates that the reference to the "Date of Participation" was a mistake and it should reference "Date of Program Entry" again.

and (DATE ENROLLED DURING PROGRAM PARTICIPATION IN AN EDUCATION OR TRAINING PROGRAM LEADING TO A RECOGNIZED POSTSECONDARY CREDENTIAL OR EMPLOYMENT (WIOA) in not null) and (OTHER REASON FOR EXIT = (00 or 07)

In this example, we have a unique record where the Date of Program Entry is not null and is \leq the end of the Report Period (PY16 ends June 2017 and PY17 ends June 2018), and Date of Exit is null (for PY16) or within the report period (for PY17) and the person was in an education program that puts them in the denominator. Therefore, the 9169 report specifications will report the Participant in both the PY16 and PY17 MSG denominators. That is, if we were to create a PY16 and PY17 PIRL using this data and run it through 9169 automation code, the participant would be in the denominator in both years on the 9169.

However, OCTAE staff said stated during the October training that if this person received fewer than 12 contact hours in PY17 they would NOT be included in the MSG denominator as reported in NRS – the NRS tables themselves are not particularly clear on this point but, OCTAE staff were emphatic in their explanation regarding MSG reporting in the NRS.

So again, either OCTAE needs to not link their NRS tables with the 9169 report template in such a manner that it overrides any 9169 report element specification or needs to modify their NRS tables specification to comport to the 9169 joint specifications when it comes to report elements that are or should be in common between the 9169 and the NRS. We recommend the latter.

CONCERN REGARDING THE NRS' ABILITY TO SUPPORT DEVELOPMENT OF STATISTICAL MODELS REQUIRED UNDER WIOA §116(B)(3)(A)(VIII)

WIOA requires development of statistical models that are to be used to make the adjustments in the State adjusted levels of performance for actual economic conditions and characteristics of participants in each state. While it is possible to develop such models without having access individual records using summary-level data instead, the “accuracy” of those models will not be as strong. Minimizing the difference in model strengths between models developed with individual records and those developed with

summary-level data requires ensuring that summary level data received is sufficiently detailed. The NRS tables do not provide that level of detail.

WIOA §116(b)(3)(A) requires the statistical models to be applied both before the year begins in the initial negotiation process and after it ends. Implicit within these requirements is the recognition that not only do programs in different states (or within a state) serve different populations under different economic condition, but that that these populations and economic conditions change. This is the case in all programs, including AEFLA. For example, though those enrolled in AEFLA will generally be less educated than those in other programs, they are still not a homogenous population. The proportion of those served who have extremely low educational functioning levels may change over time as programs have different outcomes. Perhaps in a really strong economy the state serves those with the lowest levels of educational attainment while in a bad economy more people who have previously been able to become employed with “mid-level” functioning now realize they need to improve that functioning further in order to obtain employment when employers can be more selective.

The draft NRS does not provide sufficient level of detail to support strong model development on the exit-based measures, because the NRS tables do not break out outcomes. There are numerous tables where current participant data is broken out for demographic characteristics and Table 6 provides information on the employment status and highest grade completed of current participants but, as noted, casemixes change over time. Using the demographic characteristics of current participants rather than the characteristics of those in the denominator (i.e. those who exited 1 to 1.5 years earlier) will weaken the strength of models to be developed.

While there may be temptation to take “last year’s” participant data and apply it to “this year’s” exit-based performance, since performance reported “this year” involves many people who exited last year, but that won’t work. First, not all of last year’s participants will have exited and thus been included in performance. Second, the Credential and Employed Quarter 4 measures do not follow the PY exit period. Third, TWC’s experience with exit-based measures has shown that there is a great deal of seasonality in the data. That is, those who exit in certain quarters of the year tend to have better employment outcomes because of the natural rhythm of the labor market. Programs that operate on a “school-year” model, where most

students exit in the late spring (Apr-July), will tend to have higher Employed Q2 outcomes than those who have exits distributed more evenly around the year simply because the 2nd quarter after the Apr-July quarter is the Oct-Dec quarter and that is the quarter that has the highest levels of employment. In Texas, employment in the Oct-Dec Quarter tends to be 3-5% higher than the Jan-Mar quarter (which would be the 2nd quarter after exit for those who exit July-Sept) – this is unlikely to be a Texas-only phenomenon.

Since OCTAE is not going to get student-level records (even anonymized records), it needs to minimally modify the NRS by adding tables that break out performance results by measure and characteristic by exit quarter (including the numerator and denominator) to minimize the impact of the statistical model issues raised.

TABLE-SPECIFIC COMMENTS

TABLE 3: PARTICIPANTS BY PROGRAM TYPE AND AGE

We support the proposal to breakout IET utilization by both age range and education level. TWC has implemented IET models at all levels in rule and in program implementation and the proposed modification to this table will help us highlight those efforts. We are particularly supportive of the breakout for IETs for those in English Language Acquisition (ELA) and Adult Basic Education (ABE) and not just (Adult Secondary Education (ASE). ELA and ABE students are unquestionably able to achieve Post-Secondary Credentials and with this proposal OCTAE is reminding AEFLA programs of this fact.

TABLE 4: MEASUREABLE SKILLS GAIN

The draft NRS tables would hold states accountable for MSG for each POP, yet this table does not provide meaningful information about the types of gains made, because the proposal is only breaks out the types of gains achieved for the Initial POP during the PY. TWC staff recommend that Table IV be changed so that the table focuses on all POPs rather than simply the initial POP. This would better align the report for accountability purposes since a Participant is in the MSG denominator one time for each POP in the year. Under this approach column B would be the number of POPs within the program year broken out by Entering EFL and states would be able to report MSGs by type achieved for each applicable POP.

Another benefit to this approach is that it will better support the development and application of statistical models for the MSG. One aspect of casemix that will be important to developing the MSG model is the student EFL because an examination of the data shows that MSG outcomes seem to vary by EFL with those in “lower” EFLs having a greater degree of success in achieving gains than those in “higher” EFLs. By only reporting the initial POP EFL, the data is not adequately disaggregated to clearly show the types and numbers of gains.

Consistent with the previous discussion about better aligning NRS with the 9169 reporting specifications we recommend that Table 4 be modified to allow reporting of all types of gains permitted by the specifications. In the alternative, we recommend adding an “other MSG achieved” category as a catch-all for the other types of gains permitted under the joint performance reporting specifications.

We would also like to indicate our support for the removal of the “domain of significance” limitation in the MSG measure. MSG as defined in the joint specifications does not limit gains to only those associated with the area of greatest weakness. Recognizing any gains achieved will avoid creating a disincentive to working with students on the areas that are most aligned with their individual career pathways when perhaps their areas of greatest significance are in another area.

TABLE 5 CORE FOLLOW-UP OUTCOME ACHIEVEMENT – Credential Rate Break Outs

We recommend that the instructions for this table make it clearer that if a participant exits more than once during the 4 quarter report period, the participant is included in the denominator once per exit (barring the participant having an applicable exception under PIRL element “OTHER REASON FOR EXIT”)

As discussed, we support modifying the Credential Rate methodology to be consistent with the 9169 specifications which means not limiting the inclusion of achievement of a post-secondary credential to those who were in IET. However the proposal to break out the Credential Rate data into 3 rows does not work. The instructions require states to break out the denominator between 3 lines:

- 1) Those who attained a secondary degree/equivalent AND were enrolled post-secondary education within a year;
- 2) Those who attained a secondary degree/equivalent AND were employed within a year; and
- 3) Those who attained Post-Secondary Credential while enrolled or within a Year of Exit.

On which line are those who were in the denominator but not the numerator reported? While those in post-secondary education might logically be reported on the last line, what about those in “regular” AEFLA?

We recommend that the Credential Rate data be broken out into its own table that would look something like this:

Row	Credential Rate Data	(A) Secondary Level	(B) Post- Secondary	(C) Total
1	Exiters (denominator)			
2	Achieved Diploma/Equivalent + Employment within 1 year of Exit			
3	Achieved Diploma/Equivalent + Employment within 1 year of Exit			
4	Achieved Post-Secondary Credential	NA		
5	Total Achieving Outcome (numerator)			
6	Credential Rate			

In this model, you get to break out the results by type of participation (secondary only or secondary + post-secondary) and type of achievement. Column C is the sum of columns A and B because an Exiter would only be included in one of the two columns for a given POP/Exit. The reason column B is not labeled “Secondary + Post Secondary” is that it is possible for a Participant to be in Post-Secondary and in AEFLA, but not at the Secondary Level. That said, if the Participant is in both, we’d recommend counting them in column B to simplify the table while still being able to see how many exiters achieved the diploma/equivalent + employment or enrollment outcome.

Row 5 would be the unduplicated counts from rows 2-4 (2-3 for those in Secondary Level, but not Post-Secondary). The reason for this proposal is that it is possible that a person could achieve the diploma/credential and within a year of exit be both employed AND enrolled in post-secondary

education – for that matter, they could also achieve both of those outcomes plus a post-secondary credential.

TWC staff would be happy to discuss and further develop the proposal with OCTAE staff – the above example is merely to demonstrate the concept.

**TABLE 5 CORE FOLLOW-UP OUTCOME ACHIEVEMENT – Reporting
Credential Rate for Students achieving High School
Diplomas/Equivalencies in a language other than English**

TWC staff also recommend that OCTAE enhance the instructions to Table 5 to recognize achievement of a diploma/equivalent in a language other than English. There are large communities within the United States in which literacy in a language other than English (such as Spanish) is well supported. That is, those who have literacy in another language are highly valued by employers. The draft denominator for the WIOA Credential measure as proposed focuses are students at “a ninth grade equivalent or higher upon entry” and there is no corollary for English language learners, which makes it impossible to identify these students for the either the Credential Rate numerator or denominator.

OCTAE staff has previously shown that they recognize that some states provide high school equivalency and diplomas in languages other than English. In an email shared with Texas, but originally sent to Washington state on July 14, 2016, the following language was suggested to ensure English language learners who earned a high school equivalency or diploma in another included in the “ninth grade equivalent educational functioning level or higher upon entry” denominator cohort:

“ESL students who are enrolled in a secondary program leading to a high school credential in another language may be included in the cohort if the State has established procedures that place these students in secondary programs leading to such a credential.”

TWC recommends that the footnote to this measure on Table 5 be edited to include the following language recognizing secondary school credential attainment recognized in states for other languages:

*** Report in Column B (secondary school credential attainment) the total number of participants who exited during the program year who were at the ninth grade equivalent educational functioning level or

higher upon entry, as measured by pretest with approved NRS test or ELA participants who are enrolled in a secondary program leading to a high school credential in another language if the State has established procedures that places these students in secondary programs leading to such a credential. The measure excludes incarcerated individuals under section 225 who exited the AEFLA program, but are still incarcerated.

TABLE 6 PARTICIPANT STATUS AND PROGRAM ENROLLMENT

We recommend adding back in the 12-30 hour “Work-based Project Learner” to this table as a way to better highlight the mix of programs being offered by states and the degree to which students are availing themselves of the different options available to them.

TABLES FOR PARTICIPANTS IN INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION (TABLE 3, 9 AND FEDERAL FINANCIAL REPORT)

We applaud addition of Table 9 Outcome Achievement for Participants in Integrated English Literacy and Civics Education (IELCE) and recommend changes to Table 3 and the Federal Financial Report (FFR) to promote alignment across the tables and clarify reporting.

The IELCE program requires “instruction in literacy and English Language acquisition, as well as being provided “in combination with” IET, which requires adult education and literacy activities.” OCTAE staff have pointed out at numerous meetings (LEAP 1 and 2, state director’s meeting) that these various required elements are mentioned separately from “literacy” and “English language acquisition” and “adult education and literacy activities.”

In statute, literacy means “read, write, and speak in English, compute, and solve problems” and adult education and literacy activities include “adult education,” which in statute also includes “academic instruction and education services below the postsecondary level” also including reading, writing, and mathematics or other “activities necessary for the attainment of a secondary school diploma or its recognized equivalent.”

Undoubtedly, Congress intended IELCE to be a workforce development adult education program, underscored by the job placement and in demand

occupation language included in the goal statement for the program in statute as well as the explicit language referencing to “professionals with degrees and credentials in their native countries” and that the program must be designed so that participants “competency in the English language and acquire the basic and more advanced skills.”

Tables 3 and 9 recognize some of this expanded focus found in statute for the program, but do not go far enough.

We recommend the following changes to Table 3 and FFR to accurately capture full performance in the IELCE program.

Table 3 includes a puzzling note “***** This number includes those enrolled in IET Programs. It does not include those enrolled in ELA programs.”

Because ELA is a required element of IELCE, and because the other notes on this table stipulate funding source (Sec 231/243), it appears that OCTAE is intending to guard against a duplicate count between students in standalone Sec. 231 ELA classes and those in ELA provides with IELCE. TWC recommends this note be modified to clarify this and recognize that IELCE is not limited to only ELA activities also more “advanced skills” below the “postsecondary level” taught at ABE and ASE levels in reading, writing, and mathematics as well as skills “necessary for the attainment of a secondary school diploma or its recognized equivalent.” Recommended substitute language for this note would be:

“This number includes English language learners recorded on the PIRL, who are enrolled in IET Programs under Section 243 funding. It does not include those enrolled in ELA, ABE or ASE programs funded under Sec 231.”

This edit would support alignment to the more advanced skill levels outlined in statute and included in Table 9 related to measuring skills attainment at the ABE and ASE levels for English language learners earning secondary and postsecondary credentials while enrolled.

Turning to the FFR, TWC recommends related changes be made to expand the IELCE financial reporting from the “basic” levels (c. Programs of Instruction 1-8) as was reported under WIA, to include the shaded “d. Programs of Instruction 9-12”. This edit would accurately reflect the statutes

focus on “more advanced skills” and Table 9s reporting of secondary and postsecondary credential attainment.

TABLE 11 OUTCOME ACHIEVEMENT OF INTEGRATED EDUCATION AND TRAINING PROGRAMS

We applaud the addition of Technical/Occupational Skills Progress to this table, but believe that it does not go far enough, since the joint performance reporting specification for MSG provides 5 ways to achieve gains, which should all be recognized on this table as we have recommended for table 4.

Depending on the IET program design, IET participants could show MSG through the other methods missing from the draft of Table 11. For example, a participant enrolled in an IET using the allowable workforce training option “occupational skills training” will earn a postsecondary transcript or report card (PIRL 1808) if he or she is enrolled in college or technical school training. Similarly a participant enrolled in an IET implementing the allowable workforce training option “apprenticeship” will show MSG related to the training milestone option (PIRL 1809), which includes “completion of one year of a registered apprenticeship program” in the data element description.