

November 28, 2016

Director of Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW
LBJ Room 2E-349
Washington, DC 20202-4537

RE: Comments on the Proposed Measures and Methods for the National Reporting System (NRS) for Adult Education, Docket ID ED-2016-ICCD-0104

National Skills Coalition (NSC) — a broad-based coalition of business leaders, union affiliates, education and training providers, community-based organizations, and public workforce agencies advocating for policies that invest in the skills of U.S. workers — is pleased to submit the following comments on the Office of Career, Technical, and Adult Education (OCTAE)'s draft proposal to modify the National Reporting System for Adult Education (NRS) reporting templates.

Performance reporting is a crucial element in facilitating program improvement and enhancing accountability under the Workforce Innovation and Opportunity Act (WIOA). It is perhaps especially important for WIOA Title II programs, also known as the Adult Education and Family Literacy Act (AEFLA), which now for the first time will be reporting on an array of common measures shared with other WIOA titles. Given the significance of this shift in the WIOA-funded adult education and workforce systems, it is especially important for federal requirements to provide clear and accessible guidance to the state agencies and local providers who have the responsibility of submitting performance data.

States are already required to submit WIOA performance data via the WIOA Statewide and Local Performance Report Template (ETA 9169). The current OCTAE proposal concerns an *additional* reporting requirement for WIOA Title II adult education programs, via the NRS.

It was challenging to review OCTAE's proposal in the context of WIOA joint reporting specifications, because the draft NRS tables contain minimal descriptions of the

requirements, with no narrative. The lack of detailed definitions makes it difficult to be certain exactly what OCTAE is proposing to be reported in some instances. Our comments represent our best understanding of what is being proposed.

In particular, it is not clear whether OCTAE views the NRS as a discrete reporting system that stands apart from the broader WIOA performance reporting system, and would be used to assess states' performance on WIOA Title II. If so, National Skills Coalition is concerned that the use of the NRS as a stand-alone tool would undercut the valuable opportunity provided by WIOA to align data collection and reporting across all four of the legislation's titles and establish a framework for shared accountability.

It is understandable that states' prior familiarity with the NRS may make it seem like the appropriate reporting tool during this statutorily specified two-year transition period, as OCTAE is gathering baseline data on newly required measures for Title II providers. Even if this is the case, though, states will still be required to submit WIOA reporting information via form 9169 during the same two-year period. Thus, simply from the perspective of reducing the reporting burden on state and local agencies, it is preferable for the NRS data specifications to be aligned with other WIOA reporting specifications as spelled out in 9169.

However, the issues under consideration go significantly beyond reporting burden. In particular, it is not clear to us from the published materials whether OCTAE intends to use the NRS data tables as the *primary* means of assessing states' performance on Title II, rather than 9169. If so, it is imperative that the NRS data specifications take into account statutory requirements. WIOA §116 requires that the common measures and reporting specifications from the WIOA accountability system that are included in the NRS fully comply with the standards jointly developed by the Secretaries of Education and Labor. As best we can determine from the information provided, this is not currently the case. Particular areas that are not currently aligned include:

Counting credential attainment

The draft NRS appears to count postsecondary credentials *only* if the participant was enrolled in Integrated Education and Training (IET). However, the 9169 specifications for this measure includes any individual who was in secondary or postsecondary

education during program participation. That means that a state might end up having to report two different numbers for this variable – one in the 9169, and another in the NRS – if the state had participants who were in Title II and a non-IET postsecondary education program.

This is especially concerning if the NRS is being contemplated as the basis for assessing states' performance under Title II, because as written the NRS would fail to capture the full impact of Title II adult education services in supporting participants who are pursuing non-IET postsecondary programs. We recommend that the NRS be adjusted to match the 9169.

Reporting of measurable skill gain (MSG)

Under the 9169's joint reporting specifications, an MSG can be demonstrated in one of 5 different ways. Those specifications do not differentiate between different WIOA programs.

In contrast, OCTAE's proposed NRS specifications only allow gains in 2 areas to be reported: an Educational Functioning Level gain (EFL) and Achievement of a Secondary School Diploma/Equivalent. Again, if the NRS is being used to assess state performance, this disjunction could cause states not to receive full credit for the skill gains made by Title II participants.

Therefore, National Skills Coalition strongly encourages OCTAE to enable states to report on all five types of MSG through the NRS. Among other benefits, this would eliminate the danger of having a Title II participant attain a postsecondary credential and yet not be counted as having a MSG.

To avoid creating confusion among state and local agencies, we recommend that OCTAE fully align the NRS with the common measures and 9169 specifications. If necessary, OCTAE can then build on those constructs by creating any additional groupings and levels of detail that the agency requires in order to accomplish its review and evaluation tasks. NSC supports the ability of OCTAE obtain additional, program-specific data (given reasonable constraints) as long as these data are clearly considered to be supplemental.

Finally, we note that the prior NRS had an extensive handbook that provided information to help users understand what was expected and how to comply with it. The draft tables do not have such a guide. Given that OCTAE has indicated that this material will be put out for an additional 30-day comment period after comments on this proposal have been reviewed and addressed, we 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.

We have included additional table-specific comments below. Again, we appreciate the opportunity to comment on this proposal. For more information, please contact Amanda Bergson-Shilcock, NSC Senior Policy Analyst, by email at AmandaBS@nationalskillscoalition.org.

Additional table-specific comments:

Table 3: We support the proposal to break out IET utilization by both age range and education level. Having greater granularity in the data will allow both OCTAE and the states to assess the effectiveness of IET programs in reaching and serving populations which are especially in need of upskilling opportunities, including lower-level adult basic education learners as well as English language learners.

Table 4: As described above, we recommend that Table 4 be modified to allow reporting of all types of gains permitted by the 9169 specifications. We also support OCTAE's removal of the "domain of significance" limitation in the MSG measure. This is entirely consistent with MSG as defined in the joint specifications, which does not limit gains to only those associated with the area of greatest weakness. This decision will free up Title II programs to work with participants on the domain(s) of most relevance and need to that participant, without fear that the participant's learning gains will not be counted as achievements.

Table 9: We commend OCTAE for the addition of Table 9, Outcome Achievement for Participants in Integrated English Literacy and Civics Education (IELCE). This

additional level of detail will be valuable in understanding states' activities under this newly codified section of WIOA.

We do recommend a clarification related to IELCE in the earlier Table 3. Table 3 currently includes this note: “***** This number includes those enrolled in IET Programs. It does not include those enrolled in ELA programs.”

We presume this note is attempting to distinguish between English Language Acquisition (ELA) programs funded as part of IELCE under WIOA Sec. 243, and other types of ELA programs. We recommend revising the note as follows: “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.”

Table 11: We applaud the addition of Technical/Occupational Skills Progress to this table. Again, however, we recommend that states should have the ability to report on all five types of MSG as described above.