



National Reporting System  
for Adult Education

**National Reporting System (NRS) for Adult Education  
Information Collection Request**

**OMB Control Number NRS 1830-0027**

**Responses to Public Comments Received During the 30-Day Notice**

**Comment**

Several commenters recommended that the types of gains that apply to the Measurable Skill Gains indicator be expanded for participants enrolled in workplace literacy programs and workforce preparation activities. Numerous commenters expressed a need to measure digital literacy or computer skills in the National Reporting System (NRS) for adult education.

**Discussion**

We agree with the recommendation to expand the types of gains that can be used to document a measurable skill gain for participants that are enrolled in workplace adult education and literacy activities. Section 202 of the Workforce Innovation and Opportunity Act (WIOA) defines workplace adult education and literacy activities as “*adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.*” We recognize that some workplace adult education and literacy programs have barriers to demonstrating progress towards skill gains using educational functioning level gains or high school completion, the two types of gain under the Measurable Skill Gains indicator that are currently available to AEFLA funded programs. For individuals enrolled in workplace adult education and literacy programs, an appropriate way to document progress may include a satisfactory or better progress report towards established milestones from an employer who is providing training. Another appropriate way to document progress may be successful passage of an occupational 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. These two types of gain are included in the definition of the Measurable Skill Gain indicator in the joint WIOA information collection approved by the Office of Management and Budget (OMB) on June 30, 2016, under OMB No. 1205-0526.

We do not agree that workforce preparation activities can be appropriately documented using the same documentation methods as workplace adult education and literacy activities discussed

above. Workforce preparation activities are defined as “*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 utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.*” Workforce preparation activities are implemented widely across other adult education and literacy activities and are not used exclusively in workplace education programs. While we agree that some workforce preparation activities, such as digital literacy, merit further consideration in WIOA performance reporting, other workforce preparation skills, such as critical thinking skills, are embedded in NRS assessments. We will further consider how the current Measurable Skill Gain definition may be used to measure workforce preparation competencies, particularly digital literacy, through a wider consultative process.

### **Change**

We have revised columns G and N on Table 4 to include participants in workplace adult education and literacy programs. We have also made congruent revisions to the instructions for Table 4 and the columns G and N on Table 4c.

### **Comment**

Several commenters questioned why certain types of Measurable Skill Gain (MSG) were only applicable to Integrated Education and Training (IET) participants and not available for all participants. They suggested allowing all types of MSG for all adult education participants and expanding the reporting on MSG outcomes to other types of programs beyond IET.

### **Discussion**

As noted in our previous response, we have made the additional change on Table 4 to allow the reporting of all MSG types for participants enrolled in a workplace adult education and literacy program. Except for participants enrolled IET programs or workplace adult education and literacy programs, as explained in our response to public comments published in the Federal Register on November 19, 2020, we do not agree that all MSG types are applicable to adult education participants who are not enrolled in such programs. We believe that educational outcomes are those that are consistent with the fundamental purposes of the program.

### **Change**

No change.

### **Comment**

One commenter suggested expanding MSG types to include the reporting of one or more high school equivalency (HSE) subtests, the reporting of high school course completion toward a high

school diploma, or counting participants who obtained U.S. citizenship as an outcome under the MSG indicator. The commenter also requested that all participants, who completed a secondary school diploma or its equivalent during the program year, be reported as an MSG outcome.

Another commenter acknowledged that while states may report all HSEs on the MSG table of the Statewide Performance Report, the MSG table was not sufficient due to calculations not being standardized across states. The commenter expressed a concern that the reporting of all HSEs is not part of the NRS reporting tables.

## **Discussion**

The *Joint Participant Individual Record Layout* (ETA-9170), which is part of the joint information collection *Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting* under OMB Control No. 1205-0526, defines Educational Functioning Level (EFL) gain as follows: “EFL gain may be documented in one of three ways: 1) by comparing a participant’s initial EFL as measured by a pre-test with the participant’s EFL as measured by a participant’s post-test; or 2) for states that offer secondary school programs that lead to a secondary school diploma or its recognized equivalent, an EFL gain may be measured through the awarding of credits or Carnegie units; or 3) states may report an EFL gain for participants who exit the program and enroll in postsecondary education or training during the program year.” Attaining one or more subtests leading to a secondary school diploma or its recognized equivalent, completing high school courses, or obtaining U.S. citizenship is not one of the three ways that EFL gain may be documented. These methods are also inconsistent with the five types of MSG defined in the joint regulations at 34 C.F.R. § 463.155(a)(1)(v). Changing the definition of MSG or EFL gain is not within the purview of this information collection. Thus, the commenter’s proposal would not be compliant with the joint rule or joint information collection that applies to performance reporting for all core programs, including AEFLA.

States may report all participants who attain a secondary school diploma or its recognized equivalent on the joint *Measurable Skill Gains* table which is part of the *Statewide Performance Report* (ETA-9169) in the joint information collection *Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting* under OMB Control No. 1205-0526. The purpose of the joint *Measurable Skill Gains* table is to collect data for all participants who attain a secondary school diploma or its recognized equivalent, regardless whether their secondary school diploma was the most recent gain and without the reporting limitations of the postsecondary and employment criteria associated with the Credential Attainment indicator. We believe creating an additional NRS table to collect the same data would unnecessarily duplicate burden, since data on the attainment of secondary school diplomas are already collected on the Measurable Skills Gain table which is incorporated into the NRS performance accountability framework. We are actively providing technical assistance to states to improve the data reported on the MSG table.

## **Change**

No change.

## **Comment**

Several commenters provided recommendations related to reporting distance learners. Several commenters advocated for developing an updated definition of distance learning that would be used by all states for NRS reporting purposes. Some commenters expressed concern about the limitations of the current tables due to differences in state reporting policies. They recommended that the tables be updated to improve the meaningfulness of the data or be removed. Commenters requested a national conversation to rethink distance education policy.

## **Discussion**

We agree that state variations in counting students as distance learners on tables 4C and 5A do result in limitations on how the data can be used. Nonetheless, we believe that distance learning is a significant delivery system for adult education students for which federal reporting provides important visibility. We are interested in how the current reporting structure could be revised to provide more meaningful data and are committed to expanding stakeholder consultation on the topics raised by public comment received through this information collection.

## **Change**

No change.

## **Comment**

Two commenters suggested removing the “exit” requirement from counting an EFL gain for participants who exit the program and enroll in postsecondary education or training during the program year. One commenter contended that a student should not have to be exited from adult education in order to be counted as an outcome for transition to workforce training. Another commenter stated that the Measurable Skill Gains indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period and is, therefore, not an exit-based measure. The commenter requested that OCTAE fix the error in interpretation of the MSG for transition to postsecondary as an exit-based measure.

One commenter stated that the NRS levels do not always meaningfully reflect actual educational growth and achievement. The commenter suggested providing alternative methods to measure student performance that would allow programs to have greater flexibility to work with their students in meaningful ways. Another commenter asked that OCTAE sponsor a working group to develop recommendations for a multiple measures EFL gain strategy in exchange for OCTAE encouraging a two-year paired standardized testing optional environment.

## **Discussion**

The *Joint Participant Individual Record Layout* (ETA-9170), which is part of the joint information collection *Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting* under OMB Control No. 1205-0526, defines EFL gain as follows: “EFL gain may be documented in one of three ways: 1) by comparing a participant’s initial EFL as measured by a pre-test with the participant’s EFL as measured by a participant’s post-test; or 2) for states that offer secondary school programs that lead to a secondary school diploma or its recognized equivalent, an EFL gain may be measured through the awarding of credits or Carnegie units; or 3) states may report an EFL gain for participants who exit the program and enroll in postsecondary education or training during the program year.” Changing the definition of EFL gain is not within the purview of this information collection.

### **Change**

No change.

### **Non-Substantive Comments**

#### **Comment**

Several commenters made recommendations related to methods for measuring prior education accomplishment, especially for English language learners and expanding demographic data to reflect populations served in the adult education program. Another commenter suggested developing approaches to recognizing transitions from spring to fall, even though adult education programs operate within a July to June reporting period. One commenter recommended eliminating testing altogether and allowing students to earn gains in other ways. The commenter contended that standardized testing is antiquated and does not show the growth of a student accurately. Another commenter endorsed documenting skills that make students more employable rather than relying on academic standards which, the commenter asserted, often do not translate well.

#### **Discussion**

These recommendations are not within the purview of this information collection, as they fall under the authority of the regulations at 34 C.F.R. §462 or the joint information collection *Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting* under OMB Control No. 1205-0526.

### **Change**

No change.