



Date: September 25, 2023

To: Office of Career, Technical, and Adult Education (OCTAE), Department of Education (ED)

From: State Board for Community and Technical Colleges (SBCTC)

Re: SBCTC Comments regarding: Agency Information Collection Activities; Comment Request; Measures and Methods for the National Reporting System for Adult Education

Docket No.: ED-2023-SCC-0141

## Introduction

The State Board for Community and Technical Colleges (SBCTC), as administrators of the Adult Education and Family Literacy Act (AEFLA or “Title II”) of the Workforce Innovation and Opportunity Act (WIOA or “The Act”) for Washington state, and the Council for Basic Skills (CBS), as the state system governance body representing the thirty-four community and technical colleges and five community-based organizations who administer Title II-funded programs, strongly support the proposed revisions to data collection in the “Measures and Methods for the National Reporting System for Adult Education” Collection. While all of the proposed revisions merit attention, the “New Option for Educational Functioning Level Placement of Participants on Tables 1, 4, 4A, and 4C” (“New Option”) would bring about the most substantive positive change to data collection for the NRS, and is the primary focus of this comment. This new option holds great potential to bring Title II-funded programs closer in line with the intent of the Act, increase equity for the students served in these programs, and signal to postsecondary institutions and employers a desire and an ability to partner – partnerships that are required for us to fulfill the intent of the law.

We begin by affirming the purpose of the Act. Section 2(1) plainly states that the purpose of the Act is to increase access to and opportunities for the employment, education, training, and support services that individuals with barriers to employment need to succeed in the labor market. In Section 2 the Act further seeks to (2) support the alignment of workforce investment, education, and economic development systems, (3) improve the quality and labor market relevance of workforce investment, education, and economic development efforts to provide America’s workers with the skills and credentials necessary to secure and advance in employment with family-sustaining wages, (4) promote improvement in the structure of and delivery of services to better address the employment and skill needs of workers and jobseekers, and (5) increase the prosperity of workers and employers in the United States, the economic growth of communities, regions, and States, and the global competitiveness of the United States (5.)

As to the education-specific portion of the Act, Title II posits in Section 202 a series of goals interconnected by “and”s and not “or”s:

1. Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency;
2. Assist adults who are parents or family members to obtain the education and skills necessary to becoming full partners in the educational development of their children and lead to sustainable improvements in the economic opportunities for their family;

3. Assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training, including through career pathways; and
4. Assist immigrants and other individuals who are English language learners in improving their English language skills, mathematical skills, and understanding of the American system of Government, individual freedom, and responsibilities of citizenship.

These collective purposes are clear shifts in direction from the superseded Workforce Investment Act (WIA) of 1998. WIA made no such extensive purpose statements as the Act does (noted above), and Title II of WIA made no mention in its purpose of family literacy in the context of sustainable improvements in the economic opportunities for the family, nor any mention of transition to postsecondary education and training in tandem with the completion of a secondary school education. WIOA made substantive statutory changes to the purpose of Title II funds, and the proposed New Option would allow states to better align their programming and reporting to these goals.

Washington state has taken deliberate steps to implement the changes brought about by WIOA, fitting the purpose to our state system and vision. In the SBCTC-CBS joint [“Basic Education for Adults \(BEa\) Vision, Mission, Values and Goals statement,”](#) we assert in our mission that we work collaboratively to offer culturally responsive and equity focused college and career pathways that address barriers and enable students to obtain meaningful employment, meet workforce needs, and reduce economic disparities. Further, in our vision statement, we recognize that we do this work in service of advancing racial and economic justice, echoing educator and author Booker T. Washington: “at the bottom of education, at the bottom of politics, even at the bottom of religion itself there must be for our race... economic independence.” In Washington state, more than half of the 29,553 BEa students who reported their race category in our state data system were made up of historically underserved students of color, representing Black/African-American, American Indian/Alaskan Native, Hispanic, and Pacific Islander census codes. Overall, students who report a race other than White make up 67% of our total BEa population.

While race is certainly not the only barrier to employment for our population, we know, through the personal experiences of our racially diverse staff and system, that if we do not ground our work in racial equity, then race will never be addressed. As poet Nikki Giovanni once wrote, “If now isn't a good time for the truth, I don't see when we'll get to it.” Confronting race is uncomfortable, and traditionally a taboo topic in mainstream (white) American society. Yet we know that race has been part of the founding philosophy of the United States, and continues to be a primary structuring principle in American society today – and one that still grants and denies access and privileges based on race. The majority of our most historically underserved and under-resourced students are students of color. If we are to truly offer culturally responsive and equity focused college and career pathways that address barriers and enable students to obtain meaningful employment, then we must lead with race. Doing so includes taking an honest look at our determinations of eligibility and methods for placement, assessment, and documentation of learning gains.

The racist beginnings of standardized assessments are well-documented; a review of publicly available research online supports this assertion (see, for example, [“The Racist Beginnings of Standardized Assessments.”](#)) We advocate for the movement growing across the country to resist testing abuse and overuse, and to promote authentic, contextualized assessments that focus on students’ assets, lived experience, prior learning, and economic and educational goals. In May of 2022, the Vice Presidents of Instruction for all community and technical colleges in Washington state, through their Instruction Commission, passed a resolution on standardized testing in BEa programs recommending that BEa programs be allowed to pilot alternative assessments of student support needs as well as learning gains. Per [the resolution](#), “as our system has focused on ending systemic racism and discrimination, we advocate for the exploration of alternative means of measuring student learning to treat BEa students as we do other students at our colleges.” The latter point is a nod to the fact that most colleges in Washington state have moved away from standardized assessments in favor of [informed self-placement](#) to determine college readiness and level of support needed to be successful.

## Postsecondary Partnerships and Alignment with Measurable Skill Gains (MSG) Type 3

We affirm that the Department has already made important strides in the direction for which we are advocating. The New Option is a natural evolution from changes previously made to the information collection for the NRS to better align reporting with the goals of the Act. The February 2021 renewal of the Collection added new ways to measure and report MSG in Table 4 of the NRS outside of the testing paradigm. The evolution signaled through the proposed New Option would allow state and local providers to fully make good on the potential of the MSG that were unlocked in February 2021.

MSG Type 3, the “Transcript MSG,” refers to the postsecondary transcripts for participants enrolled in an Integrated Education and Training (IET) program provided in partnership with a training provider, often a postsecondary institution. With this MSG, full-time students can demonstrate through successful completion of a minimum of 12 credit hours per semester (or a total of at least 12 credit hours over the course of two semesters for part-time students) that they have demonstrated satisfactory progress in their program of study, and thus achieve a learning gain for their program.

Washington state has already taken meaningful advantage of this new MSG type. In the reporting period from 07/01/2021 to 06/30/2022, Washington state reported 2,457 MSG Type 3 skill gains. These MSG were earned from within the ranks of the 3,679 students enrolled in the state’s Integrated Basic Education and Skills Training (I-BEST) program, a nationally recognized IET model that team-teaches adult education content contextualized to postsecondary training for high-demand industries.

The functional result of MSG Type 3 is that students no longer need to take a post-test to earn an MSG for their program; here again we affirm the movement already made by the Department to validate other means for measuring student skill gains in Title II-funded programs. The adult education content in an IET functions supportively in service of the workforce content that leads to the student earning a credential with labor market value. If the student is making satisfactory academic progress in the training portion of the program, does that not signal that the student is meeting the goals of the program (and the Act)? The unlocking of MSG Type 3 netted a real win for student and provider alike.

As of now, however, students are still required to pre-test to gain entrance into the IET that is supported by Title II funds. This runs counter to the logic of standardized testing established in rules. CFR 34.B.IV.Part 462 makes it clear that the pre- and the post-test function collectively to measure educational gain. The pre-test places students at an NRS educational functioning level, and the post-test determines whether students have completed one or more educational functioning levels or are progressing within the same level from the starting point of the pre-test result. But without a post-test to measure gain, what is the function of the pre-test? MSG Type 3 allows programs to document gains through another method (the postsecondary transcript); the pre-test loses its logical basis. There is no “post” by which to measure the distance traveled from the “pre.” The proposed New Option would resolve this inconsistency and open the door to more authentic assessments that are based on the true needs of the learners (through tools like learner self-report and outcomes-based, standards-aligned assessments) as well as the goals of the Act.

As section 3(5) of the Act explains, the term “basic skills deficient” includes adults who are unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society. Nowhere in the Act does the determination of whether an adult is “basic skills deficient” rest on determining the skill level of that adult through a standardized test. We applaud the move made in this ICR to allow states to develop other means of demonstrating the “basic skills deficiency” of adults who would benefit from enrolling in an IET that leads to a credential with labor market value and the option for further postsecondary educational opportunities. Moves like these will help the field of Adult Education shift from a deficit model of remediation to an asset-based model that provides students with the support needed to be successful in a program that pays economic and educational dividends to families, communities, states, and the nation.

## Employer Partnerships and Alignment with MSG Type 4

As with MSG Type 3, the unlocking of MSG Type 4, the “Progress Report MSG,” has already decoupled workplace literacy programs from the need to post-test. Students can demonstrate learning gains through a progress report, devised in collaboration with the employer, that is contextualized to the goals of the employer-driven program. The same logic prevails here as with the ability to demonstrate MSG through postsecondary transcripts: without a post-test there is no need for a pre-test.

The proposed New Option makes sense for workplace literacy programs because we have found that employers don’t find meaning in decontextualized adult education standardized tests. They want contextualized assessments built around their goals for their employees. In fact, we have examples of Title II-funded providers who offer workplace literacy programs using other funding streams because the employer does not want to integrate standardized testing into the program. Unfortunately, in many cases the adult education provider is not able to find an alternative funding stream, so the partnership with the employer and the training opportunity for employees are lost. Since many industries are experiencing an ongoing shortage of workers, there is a dire economic impact on the local community. Were the New Option to take effect, Title II providers could work with employers to develop initial placement assessments that make sense for the program goals.

Washington state is still in the process of growing employer-based workplace literacy programs. We believe there is enormous untapped potential in these partnerships that are aligned to the goals of the Act. Many of our students are not in need of a job; they are in need of a *better* job, and we can teach them the skills they need to be successful and to move up in the company and in their career. While our English Language Acquisition (ELA) programs are experiencing an enrollment boom (in part due to the large influx in Washington state of new arrivals from Afghanistan and Ukraine) our high school completion programs have seen lower enrollments post-pandemic. Employers need workers and have been relaxing traditional recruitment requirements in order to boost their workforces. Workplace literacy programs could provide Title II-funded providers with the opportunity to meet our students where they are at – on the job – to provide our services for the purpose of advancement within a career pathway that starts at the workplace. We are optimistic that with the proposed New Option in place we will be able to grow workplace literacy programs and upskill more residents with our services.

## English Language Acquisition (ELA) and the New Option

When scanning the MSG Outcome Types and example programs listed in the proposed New Option, certain student groups come to mind:

- Students in credit-based high school completion programs
- Students studying for a high school equivalency exam
- Students who exit Title II-funded programming and enroll in postsecondary education and training after exit (typically ASE students)
- Students enrolled in IET programs;
- Incumbent workers enrolled in workplace literacy programs.

One student type that seems conspicuously absent from the list is English Language Learners (ELL) – Washington state’s largest Title II-served population by the numbers. Many of our ELL students studying especially in the first three (1-3) NRS levels may not be enrolled in programming that is designed to yield outcomes under the MSG Outcome Types listed in the New Option. However, we argue that ELA programming should be considered an allowable program type, perhaps under the “postsecondary bridge program” type. All Title II-funded programming in Washington state is built on a career pathways model, as expressed in our state plan and most succinctly in our mission statement to offer culturally responsive and equity-focused college and career pathways that address barriers and enable students to obtain meaningful employment, meet workforce needs, and reduce economic

disparities. Our statewide “Guided Pathways” initiative includes Title II-funded programming as the foundation of all pathways.

Our Integrated Digital English Acceleration (I-DEA) program, for example, was designed with a grant from the Gates Foundation to teach English language skills in tandem with digital skills and literacy, in the context of college and careers for learners who face the largest language gaps. Unlike traditional approaches — in which learners are expected to learn English before pursuing college or job training — I-DEA teaches English contextualized to college and career skills. We are also in the process of building “bridge” modules that would work within Integrated English Literacy and Civics Education (IELCE) funded programs to serve students who have completed their I-DEA or other contextualized ELA program and want to continue learning English in the context of preparation for postsecondary education and training. Perhaps also individual student educational and career pathway plans could be seen as evidence of their goals to transition into postsecondary education and training and employment opportunities. While students at this point of study may not be positioned to earn an MSG of the types listed, we believe – for the same reasons of racial and economic justice driving all our programming – that they should be included in any pilot or permissible use of alternative assessments for placement and documentation of a learning gain, such as through outcomes checklists or standards-aligned rubrics. To that end, we also applaud the Department’s announcement of an effort to study the technical feasibility of recognizing incremental growth within an EFL as a measurable skill gain.

## High School Completion

Passing GED® Subject tests is meaningful to students and is the primary focus for those intent on earning a high school equivalency in Washington state. By removing an additional standardized test from these classes, students and providers can reduce distraction and burden from the goal; they can focus on the tests that matter.

As such we support the inclusion of “preparatory classes for high school equivalency testing” in the list of eligible program types, adding them to the students we serve in our credit-based High School Diploma program, High School+ (HS+), which already benefits from the ability to place and advance students by credit.

## Ongoing Testing Challenges Post-Pandemic

Some providers are struggling to maintain Washington state’s standard that all students not tracked by the high school credit option pre-test. Students are increasingly interested in all-online offerings and may not live close to campus, or work during regular business hours. Current remote testing ratios and requirements do not lend themselves well to large-scale testing for our bigger programs, and we continue to have issues as a system in offering remote testing, while the demand for remote learning remains high. We ask OCTAE as part of the New Option to explore at-scale solutions for remote learning assessments that will allow us to serve more students equitably while meeting our accountability requirements.

## Accountability: More, Not Less Accountable to the Purpose of the Act

We appreciate that the New Option, and all the proposed revisions to the ICR, needs careful consideration in its potential implementation. We defer to the many excellent questions posed in the public comment submitted by the National Association for State Directors of Adult Education. Overall, Washington state sees the New Option as increasing accountability by enabling us to better serve more students in programs that lead to living wage jobs and further educational opportunity; that is, accountability to the highest-level purpose of the Act. In this vein we advocate for a system by which states through their opt-in must demonstrate that their local assessment methods meet rigorous standards. We wish to strengthen the performance accountability system authorized in Section 116 of the Act. To that end, SBCTC is pursuing a planning grant with the Community College Research Center to explore the reliability and potential validity of assessments that were initially developed in the pandemic, when we were unable to test and had to find alternative ways to place and advance students. Washington state is eager to be a leader

state for the New Option, and to find new ways to produce a positive return on investment for students, taxpayers, businesses, and the economy of our nation.

## Additional Proposed Revisions

### *New Proposed Sex Categories*

Washington state already reports a sex category other than the male/female binary in our state system (“not exclusively male or female”) and we look forward to having students who report this category better represented in federal data.

### *Proposal to Define Distance Education and Standardize Reporting*

We affirm that the definition of Distance Education, as well as the acceptable methods for Distance Education reporting, need to be revisited. In addition, with the increasing move to online-only, hybrid, and HyFlex instruction, and the use of Zoom and other meeting platforms to reach students who could otherwise not be served, there is a need to review and standardize reporting methodologies and requirements. As each state and local program brings their own unique perspectives on this issue, we advocate for direct stakeholder engagement so that these unique perspectives can be shared and understood before a revision of the current definitions of Distance Education, Distance Education Reporting Methodologies, and Requirements are standardized and put forth for public comment. Stakeholders should have the opportunity to put forth through a separate process their unique needs and understanding of current Distance Education policies and provide information on the challenges that they face. We believe that stakeholders should be engaged through the use of surveys and virtual forums to ensure optimal engagement. The results of these surveys and forums can then be analyzed and used in the development of updated Distance Education definitions and guidelines for reporting.

## Conclusion

The Washington state Title II adult education system is grateful for the opportunity to share our insights, and we look forward to future engagement with OCTAE. For questions or additional information, please contact [wdurden@sbctc.edu](mailto:wdurden@sbctc.edu).

Respectfully,

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