



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 60-Day Notice

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 for the purpose of transition to postsecondary education or training or career advancement. One commenter suggested revising Table 4, Column G and a similar edit to Column N to read: “*Number of participants in postsecondary education or training transition or employment activities who achieved an MSG other than an educational functioning level (EFL) gain and secondary school diploma.*” Another commenter recommended expanding the reporting parameters on Table 4 to allow adult education providers to report not only IET activities using all MSG indicator types but also programming common for internationally trained professionals including workplace literacy, Integrated English Literacy and Civics Education, and workforce preparation activities. Several commenters suggested the use of digital literacy assessments as a means for allowing the achievement of MSG type 5 (successful passage of an exam) for all adult education participants.

Discussion

The Departments described an approach to implementing the *Measurable Skill Gain* indicator of performance in the preamble of the joint WIOA Notice of Proposed Rulemaking (April 16, 2015, 80 FR 20574) as including a variety of types of gain intended “to capture important progressions through pathways that offer different services based on program purposes and participant needs and can help fulfill the Departments’ vision of creating a workforce system that serves a diverse set of individuals with a range of services tailored to individual needs and goals...[f]or low-skilled adults, this proposed indicator provides an opportunity to track progress in reading, writing, mathematics, and English proficiency while they are participating in an adult education program prior to completing the high school credential and entering post-secondary education or training or employment.” Public comment supported this approach.

The Departments received comments in the proposed joint performance information collection related to types of gain that would apply to the adult education program. The Departments responded that they would issue program guidelines to identify the types of gain appropriate for each core program. On August 23, 2017, OCTAE issued Program Memorandum 17-2 *Performance Accountability Guidance for Workforce Innovation and Opportunity Act Title I, Title II, Title III and Title IV Core Programs*. The guidance states that the decision to use types of gain only for services which the adult education program is authorized to provide is intended to keep accountability focused on the educational measures and activities authorized in statute, acknowledging basic skills are the foundation to success in other workforce services.

OCTAE identified achievement of at least one EFL and documented attainment of a secondary school diploma or its recognized equivalent as appropriate types of gain for use under the *Measurable Skill Gain* indicator based on the adult education and literacy services authorized under the Adult Education and Family Literacy Act (AEFLA). However, we recognize that achieving an MSG via a Secondary or Postsecondary Transcript, Progress Toward Milestones, or Passing Technical/Occupational Skills Exam, listed as the third, fourth, and fifth types of gain in the joint WIOA final rule at 34 C.F.R. § 463.155(a)(1)(v)(C)(D)(E), is appropriate for adult education participants in the context of an IET program authorized under AEFLA. States have reported these types of gain on Table 11 in this information collection for participants enrolled in IET programs. We used the data reported by States to determine that this type of gain should be identified for performance accountability in the proposed revisions to the columns on Table 4. OCTAE believes that the types of gain listed as the third, fourth, and fifth types of gain in the joint WIOA final rule at 34 C.F.R. § 463.155(a)(1)(v)(C)(D)(E) are not appropriate types of gain to use for adult education participants who are receiving educational services below the postsecondary level and are not enrolled in an IET program.

The third type of gain described in 34 C.F.R. § 463.155(a)(1)(v)(C), a secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit's academic standards, is not a type of gain appropriate to use for measuring accountability of programs serving adult education participants who are not enrolled in an IET program for two reasons. First, with respect to a secondary transcript, an individual enrolled in secondary school under State law is not an eligible individual under AEFLA; thus, individuals participating in AEFLA are not enrolled in secondary school and not positioned to receive secondary transcripts. The Departments expanded the definition of EFL gain to include the awarding of credits or Carnegie units in order to provide an appropriate measure for adults enrolled in credit-based adult education. Second, with respect to a postsecondary transcript, adult education is defined in WIOA as "academic instruction and education services below the postsecondary level" (see section 203(1) of WIOA), which means that AEFLA participants, who are not enrolled in an IET program, are not positioned to earn

postsecondary credit hours. A postsecondary transcript is therefore an inappropriate accountability measure for those participants. A State, however, may register a gain under an EFL if a participant exits the AEFLA program and enters postsecondary education. We believe the expansion of the EFL definition to add credit completion and entrance into postsecondary education provides appropriate ways to measure the success of adult education participants who are not enrolled in an IET program.

The fourth type of gain described in 34 C.F.R. § 463.155(a)(1)(v)(D), a satisfactory or better progress report towards established milestones from an employer or training provider who is providing training, is not an appropriate type of gain to use to determine MSG for adult education participants who are not enrolled in an IET program. Programs and services authorized in title II of the statute, which are not delivered in the context of an IET program, do not include “placing” a participant with an employer or training provider, as do other core WIOA programs. For example, the vocational rehabilitation (VR) program may pay for the placement of a participant in a training program and appropriately measure success of the VR program on this type of gain. With the exception of IET programs authorized under AEFLA, adult education providers deliver educational services below the postsecondary level through direct service rather than via “placement” with a training provider or an employer.

The fifth type of gain described in 34 C.F.R. § 463.155(a)(1)(v)(E), successful 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, is not an appropriate type of gain to use to determine MSG for adult education participants who are not enrolled in an IET program. Programs and services authorized under AEFLA, which are not delivered in the context of an IET program, do not include the administration of such exams to measure the attainment of technical or occupational skills, as do other core WIOA programs. Except for IET programs authorized under AEFLA, adult education providers deliver educational services that are not designed to provide the technical or occupational training required for a particular occupation or to prepare participants to pass the content of technical or occupational skills exams.

Change

No change.

Comment

While there was support for the proposed new columns on Table 4 for participants enrolled in IET programs, several commenters questioned whether the proposed changes should be effective for program year 2020 data reported on October 1, 2021. They emphasized that States would need time for training, updates to data collection systems, and consideration of parallel changes needed on other tables. They suggested delaying the implementation of the proposed changes to

Table 4 to allow for these activities. One commenter added that the proposed changes would require time to secure data-sharing agreements.

Discussion

We agree with the commenters that some States may not be able to use the new columns on Table 4 for IET participants, when performance data for program year 2020 are reported on October 1, 2021. However, their use is not required. If a State does not yet have the data to report in those columns, they may leave them blank. As States expand their IET programs and collect the outcome data associated with those participants under the MSG indicator, we anticipate that the use of the new columns on Table 4 will increase. Additionally, many States have been collecting these data to report MSG outcomes for IET participants on Table 11. We do not believe it would be reasonable to delay the opportunity for those States to report the data they have already collected. However, we will include language in the supporting statement that States are not required to use the new columns in 2021, if they do not yet have the data to report in those columns.

Change

No change.

Comment

One commenter questioned whether it was necessary to break out IET participants on Table 4, when all types of MSGs for IET participants are already counted on Table 11.

Discussion

Table 11 is designed to allow multiple MSGs outcomes to be reported for each period of participation but is not used to calculate performance. Table 4 requires only the most recent MSG outcome to be reported and is used to calculate performance outcomes consistent with the requirements of the joint information collection.

Change

No change.

Comment

One commenter suggested adding a note to Table 4 that would define the applicable AEFLA activities for reporting. The commenter proposed the following language: “Activities for the purpose of postsecondary education or training transition or employment mean integrated education and training, workforce preparation activities and workplace adult education and literacy activities.”

Discussion

Section 203(2) of WIOA defines adult education and literacy activities as “programs, activities, and services that include adult education, literacy, workplace adult education and literacy activities, family literacy activities, English language acquisition activities, integrated English literacy and civics education, workforce preparation activities, or integrated education and training.” The definition suggested by the commenter is not consistent with the definition in the statute. Because Table 4 and its instructions do not reference the term “AEFLA activities,” we do not believe it is necessary to define it as a footnote to the table.

Change

No change.

Comment

One commenter suggested adding a column to Table 4 labeled: “Number who attained one or more subtests leading to a secondary school diploma or its recognized equivalent.”

Discussion

The purpose of Table 4 is to report the different types of MSGs that count toward State performance. Attaining one or more subtests leading to a secondary school diploma or its recognized equivalent is not one of the five types of MSG defined in the joint regulations at 34 C.F.R. § 463.155(a)(1)(v). Thus, the commenter’s proposed addition of a new column on Table 4 to collect such as measure would not be compliant with the joint rule or consistent with the purpose of Table 4.

Change

No change.

Comment

Several commenters proposed adding a new row on Table 4 for participants who did not receive an NRS approved pre-test and thus could not be assigned to an appropriate EFL.

Discussion

34 C.F.R. § 462.42(a) requires that a local eligible provider use the results of the pre-test described in 34 C.F.R. § 462.41(b) to initially place students at the appropriate NRS educational functioning level. However, during the COVID-19 pandemic and consistent with the flexibilities provided in OCTAE program memorandum 20-5 *Adult Education and Family Literacy Act and COVID-19 – Frequently Asked Questions, Part 3*, a local program may use other assessment

methods to provisionally assign an EFL for the purpose of placing students into the NRS when an approved NRS pre-test cannot be administered.

Change

No change.

Comment

Several commenters suggested removing the “exit” requirement from the instructions in Table 4 which applies to counting an EFL gain for participants who exit the program and enroll in postsecondary education or training during the program year. They proposed replacing the instruction with the following language: “States may report an EFL gain for participants who transition from adult education and literacy activities and enroll in credit or transcript-bearing postsecondary education or training during the program year.” Similarly, other commenters proposed adding a new MSG 1(d) measure: “States may report an educational functioning level gain for participants who transition from a program below the postsecondary level and dually enroll in a program below postsecondary level and a postsecondary education and training during the program year.” Another commenter stated that requiring participants to exit in MSG 1c can exclude participants from earning the measure in the fourth quarter because the measure needs to be achieved by June 30.

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. Regarding the comment about exiting during the fourth quarter, participants may achieve an EFL gain even if they exit the program and enroll in postsecondary education or training on the same day, such as June 30.

Change

No change.

Comment

Two commenters proposed replacing the EFL levels on Table 4 with participant age categories as in Table 2. They also recommended deleting Table 1 and only collecting participant sex, age, and ethnicity/race on Table 2.

Discussion

The purpose of Table 4 is to report the different types of MSGs that count toward State performance, including EFL gain. The EFL levels in Table 4 are required for this purpose. MSG performance, including EFL gain, is disaggregated by age on 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.

Change

No change.

Comment

One commenter suggested expanding Table 4 to account for gains in workplace literacy, workforce preparation, and digital literacy.

Discussion

Workplace adult education and literacy, as defined in AEFLA section 202 (16) is defined as adult education and literacy activities offered in collaboration with an employer or employer organization. As such, the services received in workplace programs must include instruction to read, write, and speak English, compute and solve problems, the same skills measured in Table 4. Workplace preparation skills and digital literacy are currently encompassed in the NRS descriptors. Participants in these programs who achieve a gain are included on Table 4. In addition, the new Table 4 columns we have proposed for reporting other MSGs for IET participants are intended to collect outcome data for programs that provide adult education services concurrently and contextually with workforce preparation activities and workforce training. We believe that creating additional columns to collect data for the same outcomes would create an unnecessary reporting burden to States and local programs.

Change

No change.

Comment

One commenter felt that the instructions for calculating and tracking MSG 1c in Table 4, “participants who exit a program below the postsecondary level and enroll in postsecondary education and training during the program year” is complicated and confusing.

Discussion

The language for the instruction in Table is based on language in 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. Changing the language is not within the purview of this information collection. However, we will review our technical assistance and consider developing materials to help clarify the instruction.

Change

No change.

Comment

One commenter stated that internationally trained professionals often participate in English as a second language (ESL) to build the English literacy needed to enter college or university classes and recalibrate their professional training from their home county to meet U.S. credential and employment requirements. The commenter indicated that their needs were more focused on passing English proficiency tests needed to enter postsecondary education or training programs. The commenter reasoned that, because these participants already have advanced degrees, it would be rare for them to need or desire IET or Integrated English Literacy and Civics Education (IELCE) programs. The commenter asserted that IET and IELCE programs are designed for participants with little or no technical skills. The commenter proposed revising Table 4 to add a new row in column A labeled “Other Assessment,” or another label, and using the new row to report internationally trained professionals without pre-testing them with an NRS-approved test or assigning them to an EFL.

Discussion

We agree with the commenter that participants with advanced degrees from their home countries often seek adult education and literacy services to improve their English language skills to enter postsecondary education or to meet U.S. credentialing and employment requirements. Section 203(2) of WIOA includes English language acquisition as one of the activities authorized under title II of the statute. We believe that English language acquisition programs are well suited for internationally trained professionals with limited English language proficiency, as such programs are required by 34 C.F.R. § Part 463.32 to offer educational and career counseling services to assist participants in their transition to postsecondary education or employment. All adult education participants, including those enrolled in an IET program, must receive a level of educational services appropriate for their EFL. We do not agree that internationally trained professionals with limited English language proficiency should be excluded from assessing their level of English language skills with an NRS approved pre-test and an appropriate pairing of English language acquisition services that are commensurate with their educational needs.

Change

No change.

Comment

Two commenters proposed updating Table 4c to include the full complement of WIOA MSG types and WIOA exit based measures mapped to participant demographics and individuals with barriers to employment characteristics, and collect the proportion of distance education that participants experience (e.g. 0-25%; 26-50%; 51-75%; 75-99%; 100%).

Discussion

We agree with the commenters that Table 4c should be modified to include all of the MSG types collected on Table 4. We believe that using the same columns on both tables would accomplish this objective. States determine which participants are reported on Table 4c in accordance with the distance education business rules established by the State. We do not believe that the proportion of distance education services that participants receive should be defined at the federal level. Data for exit based primary indicators of performance are collected on Table 5a. As such, we do not believe that these data should be included on Table 4c.

Change

We have revised Table 4c to include the same columns as Table 4.

Comment

Two commenters recommended modifying Table 4b to include a column for pre-tested students, so that the table would be used to report pre-test EFL level data on Table 4b only for participants who will be measured by pre-test/post-test.

Discussion

The instructions for Table 4b indicate that participants should only be reported in this table if they have received a pretest and posttest. However, we believe a specific instruction for column B could be added clarifying that only participants who have received a pretest and posttest should be reported in that column.

Change

We have revised Table 4b to include an instruction about column B.

Comment

One commenter proposed either eliminating tables 4c and 5a related to distance education or retaining the tables and counting all adult education students in distance education regardless of

number of hours or percentage of time spent. The commenter contended that the data captured in the distance education breakouts on tables 4c and 5a are no longer meaningful, since the definition of distance education students is determined by individual States. Another commenter recommended eliminating State definitions of distance education students and replacing Tables 4c and 5a with a single distance education outcomes table that evaluates participant outcomes through WIOA indicators by the percentage of adult education instructional hours in distance education (e.g. 0%, 1-49%, 50-75%, and 76-100%). One commenter proposed redesigning Table 4c as a reporting vehicle for digital literacy, while three commenters advocated for eliminating Table 4c altogether.

Discussion

As a result of the COVID-19 pandemic, many adult education programs have implemented enhancements to their delivery system and added an array of distance education options and formats to support continued educational services for participants. The design and delivery of distance education services vary by State and by local programs within each State. In addition, the challenges that States face in providing distance education and tracking the percentage of hours associated with various formats are also diverse. In many States, distance education may be delivered through a hybrid model with varying degrees of time spent in the classroom and in a remote learning environment. We believe that imposing a national definition for distance education on all States and a uniform requirement that each State track distance education hours in the same way would be inconsistent with the unique needs of each State and would create significant burden to local programs. Moreover, we believe that there is an especially critical and timely need to evaluate the effectiveness of programs serving an increasing number of distance education participants. We do not believe the distance education tables should be eliminated or that their purpose should be modified. They serve a key role to guide efforts for program management and improvement, both now and in the years to come.

Change

No change.

Comment

One commenter emphasized the need to collect data on the number of secondary school diplomas or their recognized equivalent that participants earned, without restricting the reporting only to those diplomas that were achieved according to the criteria articulated under the credential attainment indicator. The commenter suggested adding a row to Table 5 labeled: *“Total Attained a Secondary School Diploma/Recognized Equivalent during Program Year and corresponding note that this is the total count before applying credential attainment indicator factors within one year of exit.”* Another commenter stated that reporting all secondary school diplomas or their recognized equivalent that are awarded to AEFLA participants is the metric that is by far the most requested data element by various funders, stakeholders, and partners.

The commenter expressed concern about not having an official and complete count of these important credentials.

Discussion

We agree with the commenters that there is a clear and standing need to collect and report data on the number of participants who earn a secondary school diploma or its recognized equivalent. We frequently receive requests for this data. States may report all participants who attain a secondary school credential 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 credential or its recognized equivalent, regardless whether their secondary school credential was the most recent gain and without the reporting limitations of the postsecondary and employment criteria associated with the credential attainment indicator.

Change

No change.

Comment

One commenter stated that the EFL measure at entry creates a participant eligibility requirement that is not in the statute.

Discussion

The definition of eligibility in section 203(4) of WIOA applies to all participants receiving services under title II. To be eligible for services, an individual must have attained 16 years of age, not be enrolled, or required to be enrolled in secondary school under State law, and must be one of the following:

1. basic skills deficient;
2. not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or
3. an English language learner.

The assignment of an EFL is not a requirement for program eligibility. Although many programs do use a pretest to determine eligibility, individuals who meet the eligibility requirements of section 203(4) of WIOA may be enrolled in an adult education program without a pretest. If a pretest is not used, programs must determine that a student is an eligible individual for the adult education program by other means identified by the State or the local program.

States may establish their own guidance or procedures to determine program eligibility without a pretest.

Change

No change.

Comment

One commenter suggested adding a category for distance education that does not require any face-to-face contact and a waiver from the standardized pre- and post-testing.

Discussion

Like all participants, participants in distance education must have at least 12 hours of contact with the program before they can achieve participant status for Federal reporting purposes. The initial 12 contact hours for distance learners can be any combination of in-person contact and contact through telephone, video, teleconference, or online communication, where participant and program staff can interact and through which participant identity is verifiable. §462.42(a) requires that a local eligible provider use the results of the pre-test described in §462.41(b) to initially place students at the appropriate NRS educational functioning level. However, during the COVID-19 pandemic and consistent with the flexibilities provided in OCTAE program memorandum 20-5 *Adult Education and Family Literacy Act and COVID-19 – Frequently Asked Questions, Part 3*, a local program may use other assessment methods to provisionally assign an EFL for the purpose of placing students into the NRS when an approved NRS pre-test cannot be administered

Change

No change.

Comment

Two commenters proposed expanding the sex and race/ethnicity categories for self-reporting.

Discussion

We acknowledge that States and local programs have implemented new policies for the collection of participant demographic data. Additionally, we understand the reasoning behind the proposal to align the federal data collection process with State and local changes. However, the participant demographic categories for sex and race/ethnicity in this information collection must align with those in the joint *Statewide Performance Report Template* (ETA-9169) which is part of the joint information collection *Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting* under OMB Control No. 1205-0526.

Change

No change.

Comment

Several commenters expressed their support, raised clarifying questions, or had concerns about the proposed new Table 99. Commenters who were concerned with the new table suggested that it could be duplicative, questioned whether performance rates could be automatically calculated, and suggested that the denominators could be derived from the data already collected.

Commenters who supported the new table stated that it would ensure more accurate reporting on the Statewide Performance Report and that the burden to implement the new table would be negligible. One commenter asked whether the automatically calculated statewide performance rate, using the numerators and denominators on Table 99, would be the same rate that is calculated for all levels on Table 4. The commenter also requested clarification about the relationship between the MSG column on Table 99 and the columns on Table 4. Another commenter asked for clarification about the purpose of the new table and its use at the federal, State, or provider level.

Discussion

We appreciate the comments about the proposed table 99 and the opportunity to address the clarifying questions. Table 99 would not be duplicative. Unlike our federal partner programs, the National Reporting System (NRS) for adult education does not collect individual participant record data and thus does not have the denominators for the disaggregated subgroups by participant characteristics and employment barriers in order to calculate accurate performance rates for those subgroups on the *Statewide Performance Report Template* (ETA-9169). To date, we have used the performance rates and numerators reported to us for the disaggregated subgroups to calculate inferred denominators, summed them for comparison with the statewide numbers, and determined that the sum of all inferred disaggregated denominators frequently do not equal the actual statewide denominators. Over the past 20 years, our experience with other NRS tables has demonstrated that collecting the numerator and denominator consistently yields more accurate outcome data, when our data system uses those two variables to automatically calculate performance rates. Table 99 will result in a user-friendly approach that is aligned with the familiar data entry procedures for other NRS tables and yield no additional burden for respondents, as they will enter the denominators instead of the performance rates for each subgroup under an indicator. Our data system will use the numerators and denominators on Table 99 to automatically calculate accurate performance rates on the *Statewide Performance Report* that match the performance rates calculated on Tables 4 and 5 and to validate the summed denominators and numerators for disaggregated subgroups within the *Statewide Performance Report*. In addition, our data system will validate the denominators, numerators, and performance rates on the *Statewide Performance Report* with the corresponding data in the

columns for all periods of participation on Tables 4 and 5. By using Table 99 to align our data entry procedures in this way, we believe that the individual and national *Statewide Performance Reports* in future program years will provide the public with consistently valid and reliable performance data.

Change

No change.

Comment

One commenter suggested a lack of data collection of the education levels of students in federally funded programs limits the ability of programs for English language learners to serve immigrants and refugees with international credentials appropriately and adequately. The commenter wrote that providers of English language acquisition programs often offer mixed-level ESL classes that combine students with varying education levels.

Discussion

Data are collected at intake and reported on Table 6 to report the highest educational level completed by all participants, including English language learners, prior to program entry. We believe the use of a pre-test at intake helps to place students at the appropriate NRS educational functioning level and thus into a class best suited for their educational needs.

Change

No change.

Non-Substantive Comments

Comment

Several commenters made recommendations related to the definition of attainment of a secondary school diploma or its recognized equivalent. Other commenters disagreed with the definition of transition to postsecondary education. Some commenters made recommendations related to the definition of performance under MSG, such as allowing multiple MSGs for individual students in a given reporting period to demonstrate progress over the course of participation, making changes to the denominator for calculating EFL gains via the pre-posttest method, or changing the timeframe for achieving an MSG. Other comments were made about the definitions of certain terms used for joint performance accountability or raised concerns that the some of the primary indicators of performance do not align with the adult education program.

Discussion

The primary indicators of performance described in section 116 of WIOA apply to participants in all core programs, including adult education participants. The criteria and definitions used for the primary indicators of performance are articulated in the joint information collection *Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting* under OMB Control No. 1205-0526. Changing these criteria and requirements is not within the purview of this information collection.

Change

No change.

Comment

A number of commenters provided recommendations or voiced concerns regarding assessments, such as removing the requirement for pre-testing, allowing alternatives to testing and reporting outcomes, eliminating the categorization of all participants by educational functioning levels, changing the hours required for post-testing with specific assessments, and modifying regulations that pertain to assessment administration,

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.

Comment

Several commenters offered recommendations to collect individual student records, create crosswalks to MSG types, assist those with no internet access, or suggested studies to determine more effective measures for professional immigrants and refugees with international credentials.

Discussion

These recommendations are not within the purview of this information collection, as they relate to issues and activities external to the adult education program and the NRS.

Change

No change.