



## **Comments on the Changes Made in Response to Comments Received During the 60-day Notice**

### **Comment**

All commenters in this round expressed strong support for the changes the Office of Career, Technical, and Adult Education (OCTAE) made in response to the public comments received during the 60-day notice. Some commenters welcomed OCTAE's commitment to providing technical assistance in certain areas that require additional consultation, while others appreciated OCTAE's careful review of the comments, thoughtful development of detailed narrative responses, justifications provided, and the meticulous notation of adjustments to the NRS reporting instrument that OCTAE staff members carried out since the end of the 60-day comment period. Several commenters expressed enthusiasm for the opportunity to work with OCTAE on selected topics during the consultative engagement sessions.

### **Discussion**

We appreciate the broad support for the changes OCTAE made in response to public comments received during the 60-day notice and share the commenters' enthusiasm for the cooperative engagement opportunities in the future.

### **Change**

No change.

## **Typographical Error**

### **Comment**

One commenter noted that Table 4A contained a typographical error by including "Alternative ABE Placement" in the spot where "Alternative ESL Placement" should be.

### **Discussion**

We appreciate the commenter calling this typographical error to our attention and have made the correction to on Table 4A.

### **Change**

We have revised the row label on Table 4a to "Alternative ESL Placement."

# Suggestions for Additional Changes

## Comment

Two commenters appreciated the clarifying edits to columns G and N on tables 4 and 4c but asked whether those columns should allow for the reporting of MSG types 3, 4, and 5 for all program participants, not only those in IET and workplace programs. Another commenter suggested several additional renaming and labeling changes on Table 1. The same commenter asserted that workforce preparation activities should be allowed as a standalone activity under title II and cited statutory language which the commenter believed supported his argument.

## Discussion

Section 203(17) defines workforce preparation activities 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...” We note the words “designed to help” as key language in this definition. We interpret this language to mean that workforce preparation activities represent a component of a comprehensive instructional approach that is designed to help participants achieve outcomes such as the acquisition of basic skills articulated in the statute under title II. However, we do not infer from a plain reading of the law that workforce preparation activities should be offered separately, out of context, or in the absence of other essential instructional components in an adult education program. We acknowledge that workforce preparation activities may be offered contextually and concurrently with other adult education services, such as instruction in literacy, numeracy, and English language acquisition.

We acknowledge and expect that there may be other possible changes to this information collection that could be made in the future, such as considering the reporting of MSG types 3, 4, and 5 for participants not enrolled in a program designed to produce such outcomes or initiating additional labeling changes. However, the changes proposed by these comments could have the potential to add significant respondent burden or result in unintended programmatic consequences that have not yet been evaluated to be commensurate with the value of making such changes at this time. We will closely monitor the implementation of the changes proposed in the renewal of this information collection request to date and continue to engage with adult education stakeholders to determine the need and utility of making any additional changes.

## Change

No change.