



## **Reporting Reflects Current and Meaningful Adult Education Outcomes**

### **Comment**

One commenter expressed support for extending the information collection without change but encouraged OCTAE to confirm in their supporting materials that the “current performance measures and reporting methods continue to reflect the most meaningful and up-to-date indicators of adult education program outcomes.” To achieve this, the commentator suggested that “OCTAE clarify whether any revisions to underlying definitions, methodologies, or data elements have become necessary since the collection was last approved.”

### **Discussion**

We appreciate the support for extending the information collection period without change. OCTAE recognizes the importance of periodically assessing whether underlying definitions, methodologies, and data elements remain appropriate and aligned with program and reporting needs. The performance indicators for adult education programs authorized under Title II of the Workforce Innovation and Opportunity Act (WIOA) are defined in Section 116 of WIOA. The reporting methodology for the indicators is defined in joint guidance issued by the U.S. Departments of Education and Labor in OCTAE Program Memorandum 17-2. We regularly work with our WIOA core partners to review and refine performance accountability guidance and technical assistance. Although we have determined that revisions are not needed since the most recent renewal of this information collection, we will carefully consider this feedback and continue to assess whether additional clarification in supporting materials or future revisions may be warranted to better reflect program outcomes.

## Change

No change.

# Data Reporting Consistency, Comparability, and Reporting Burden

## Comment

One commenter noted that states have raised questions regarding the comparability and consistency of how certain measures are calculated and reported and encouraged OCTAE to address those concerns in its response to public comment. This commenter also encouraged OCTAE to describe the extent to which states are able to submit performance data electronically or through system-to-system reporting and to identify any opportunities for further reducing respondent burden while improving the timeliness and usability of the data.

## Discussion

We thank the commenter for raising concerns regarding the comparability and consistency of performance measure calculations and reporting. In compliance with Section 116 of WIOA and implementation guidance issued jointly by the Departments of Education and Labor, all WIOA core programs calculate and report data for the applicable WIOA primary indicators of performance according to jointly articulated methodology. OCTAE has not received any recent comments or concerns from states on this topic but will seek and review any feedback shared in the future to determine whether additional guidance or technical assistance is needed. OCTAE also appreciates the comment regarding electronic data submission and system-to-system reporting. Although electronic reporting is standard through the NRS, states may vary in the design and capabilities of the systems they use to collect, manage, and transmit data. Where feasible and consistent with statutory and regulatory accountability requirements, OCTAE will continue to explore opportunities to analyze and evaluate existing reporting approaches and identify potential strategies for reducing respondent burden further and accelerating public access to the most recent data.

## Change

No change.

# Create an Alternative Placement Row in Table 1.

## Comment

One commenter suggested adding an Alternative Placement row and corresponding instructions to allow providers to report learners who participate in programs primarily designed to result in measurable skill gains (MSGs) other than an Educational Functioning Level (EFL) gain under MSG type 1a, such as Integrated Education and Training programs, workplace literacy programs, and preparatory classes for high school equivalency testing. The commenter noted that this approach would enable learners to “begin adult education programs without instantly being enrolled in a specified program” and would allow educators to focus on recommending the most appropriate course of study for each learner.

## Discussion

During the previous renewal of this of this information collection in 2024, we made changes in response to public comments by adding Alternative Placement rows for the Adult Basic Education (ABE) and English as a Second Language (ESL) programs on NRS Table 1 (“Participants by Entering Educational Functioning Level, Ethnicity, and Sex”), NRS Table 4 (“Measurable Skill Gains (MSG) by Entry Level”), NRS Table 4a (“Educational Functioning Level Gain (MSG Types 1a, 1b, 1c, 1d”), and NRS Table 4c (“Measurable Skill Gains by Entry Level for Participants in Distance Education”). These changes, along with accompanying reporting instructions, were intended to support the reporting of participants and Measurable Skill Gains (MSG) performance in programs designed to yield MSGs other than EFL gains through pre- and post-testing. The addition of these Alternative Placement rows has afforded states and local providers a useful option for reporting learners enrolled in programs such as Integrated Education and Training (IET), workplace literacy, and other instructional models that may not be primarily focused on EFL advancement. We believe that the current versions of NRS Tables 1, 4, 4a, and 4c address the recommendation raised by the commenter.

## Change

No change

## Allowing Multiple Measurable Skill Gains to be Reported in a Program Year

### Comment

One commenter noted that program directors and educators routinely express frustration with the perceived limitations in documenting MSGs achieved by individual learners. The commenter suggested that allowing programs to report all progress made by learners during a program year would provide the Federal government and policymakers with a more complete picture of the range of skills and outcomes that adult education programs help learners attain. The commenter also stated this will help programs to be “incentivized to encourage learners to continue to make skill gains after attaining one MSG.”

## Discussion

We appreciate the comment and recognize the value of fully documenting learner achievements that occur during participation. We note that the current joint WIOA accountability reporting framework is designed to capture a broad range of documented learner progress and outcomes through the MSG indicator types and related reporting tables. Specifically, the “Measurable Skill Gains” table, approved in the joint information collection under OMB control number 1205-0526, currently captures the total skill gains made within each MSG type. Thus, a participant achieving more than one MSG type may be reported more than once on the joint “Measurable Skill Gains” table. We will consider opportunities for enhanced technical assistance that highlights the usefulness of the data reported on the “Measurable Skill Gains” table for program administration and public accountability and will continue to review stakeholder feedback regarding the need to further enhance the reporting of participant achievements.

## Change

No change.

## High School Equivalency Subject Area Test as an MSG Type 4 Training Milestones

### Comment

One commenter stated that passing a high school equivalency (HSE) subject area test is a significant accomplishment for adults who previously left school without earning a high school diploma or HSE credential. The commenter noted that achieving this milestone can motivate learners to continue their education and advance along a career pathway leading to family-sustaining wages. The commenter suggested that successful completion of an HSE subject area test be recognized as a Type 4 Training Milestone under the MSG indicator and that providers be allowed to capture and report this achievement as a measurable outcome. The commenter further indicated that recognizing this achievement could incentivize programs to “encourage

learners to continue their education and training,” similar to proposals that would allow providers to report multiple MSGs within a program year.

## Discussion

We appreciate the comment and recognize that passing an HSE subject area test represents important progress toward a secondary credential. In June 2024, MSG type 1d was added as a new MSG type in the joint performance accountability guidance for WIOA core programs (OCTAE Program Memorandum 17-2). Under MSG Type 1d, states may report an EFL gain for participants who pass a subtest on a state-recognized high school equivalency examination. MSG Type 4 is intended for progress toward training-related milestones documented by an employer or training provider and is not designed to capture progress toward a high school equivalency credential. We note that the current MSG framework appropriately distinguishes between training milestones and educational progress measures and will continue to seek and review feedback regarding opportunities to recognize additional learner achievements within the joint WIOA performance accountability reporting structure.

## Change

No Change.

## Digital Literacy Assessments as MSG Type 4 Training Milestones

### Comment

One commenter noted that employer surveys consistently identify digital literacy as a critical skills gap, despite growing employer demand for these competencies in the workforce. The commenter recommended that the NRS recognize progress on digital literacy assessments as a measurable skill gain to support learner attainment of these essential skills. The commenter further suggested that NRS tables and guidance support the use of MSG

Type 4 training milestones to document progress toward established digital literacy objectives. Additionally, the commenter stated that implementing this recommendation would require alignment of service definitions across WIOA core partner programs.

## Discussion

We appreciate the comment and recognize the importance of digital literacy skills for employment. Under the current joint WIOA performance accountability framework, progress on digital literacy assessments is not identified as a separate measurable skill gain type. However, flexibilities exist for reporting digital literacy gains in specific contexts. MSG Type 4 is intended to document satisfactory progress toward established training milestones reported by an employer or training provider and is generally used to report gains achieved by workplace literacy and IET participants. The use of digital literacy assessments and related certifications may be appropriate for reporting digital skill gains in these programs. We will continue to explore stakeholder feedback for opportunities to support the recognition of emerging competencies, including digital literacy, through joint performance accountability reporting structures. However, as the commenter notes, changes to MSG reporting fall within the purview of the joint information collection request (ICR) under OMB control number 1205-0526 and joint guidance for WIOA performance accountability in OCTAE Program Memorandum 17-2. We will engage with our WIOA partners to identify any opportunities for further recognition of these skills.

## Change

No change.

# Require Documentation of Co-Enrollment Between Title I and Title II

## Comment

One commenter recommended that the NRS include documentation of participants who are co-enrolled in Title I and Title II programs to support greater coordination and collaboration across WIOA core programs. The

commenter also suggested that NRS instructions reiterate that measurable skill gains and other participant outcomes for co-enrolled individuals be measured and reported consistently across both systems, rather than separately.

## Discussion

We appreciate the comment and recognize the value of coordination among WIOA partner programs to improve data quality and service delivery. The reporting of co-enrollment falls within the purview of the joint ICR on performance accountability under OMB Control Number 1205-0526, reflecting the shared nature of the data. Shared WIOA performance accountability provisions also establish a common framework for measuring participant outcomes across the core programs, including measurable skill gains and other primary indicators of performance. Joint federal WIOA performance accountability guidance supports coordination across core programs and the linking or coordination of state data systems, including participant-level data matching and reporting where appropriate. In compliance with the accountability requirements articulated in WIOA, each core program collects and reports joint and title specific data to support joint and program-specific administration and accountability. OCTAE will continue to seek and review stakeholder feedback for opportunities to improve coordination and alignment in reporting outcomes for co-enrolled participants.

## Change

No change.