



# National Coalition For Literacy

## NCL Recommendations for NRS Reform

### **Issue: Educational Functioning Levels (EFLs)**

Using current educational functioning levels to quantifiably measure educational gains is too rigid and does not allow the system to accurately count statistically significant learning gains, particularly at the lower end of the basic skill levels. This makes it difficult for programs to demonstrate progress with lower level learners specifically, who most often cannot make two years progress in one year in order to be counted as completers, and may provide a disincentive to serve them. We know from experience that middle level learners tend to plateau, making it difficult to show gains using the current EFLs. The system needs to be overhauled in order to be fair, in particular, with respect to low and mid-level learners.

### **Recommendations:**

- Identify what learning should be measured and revise accordingly.
- Implement a process to review and replace educational functioning levels with an improved system for measuring statistically significant educational learning gains on nationally recognized tests, and ask states to report these numbers. Use different benchmarks for progress that are more flexible, allowing programs to more accurately measure and count educational gains.
- Track student learning gains for the duration of their participation in program services, even if it crosses program years. Measuring gains exclusively on an annual basis can serve as a disincentive to students setting higher goals for themselves. Tracking students for longer periods of time will help move the system toward an emphasis on greater success in the short- and long-term.
- To ensure that gains are significant and do not reflect practice effects, the Department of Education should convene a panel of testing experts to determine the best protocol for such testing and to recommend ways to align testing practices among adult education, postsecondary educational institutions and the workforce development system.

### **Issue: Currently Approved Standardized Tests**

The approved standardized tests do not very effectively assess at the lowest end of the lowest skills levels. Learners demonstrate more variation within categories than the test actually reveals. Progress is being made by these learners but their progress is not being measured; the categories are too broad to accurately reflect their progress. Additionally, the difficulty with test administration, the need for improved pre/post test protocols and guidance, and the limited number of approved tests are affecting the validity of assessment results at all levels.

**Recommendations:**

- Allow the use of diagnostic test instruments to measure learner progress at the lowest levels of literacy skill and English language proficiency as an alternative to standardized tests that may not be appropriate at these levels.
- If the educational functioning levels are not eliminated altogether, they should be narrowed so that smaller increments of gain can be demonstrated. Scaled scores would achieve this.
- Create standardized tests appropriate for testing at the lowest levels of basic skills and English language proficiency.

**Issue: Performance Assessment and Project Learners**

Adults come to adult education for assistance with a variety of goals including specific learning projects. The immigrant worker in the mall wants to read the mall map placard so he can direct shoppers. Parents want to support their children’s learning. A forklift driver wants to be able to read her manifest. A senior adult wants help with personal finance mathematics. It is not practical to capture their learning using the pre/post standardized tests currently approved in the NRS.

The NRS can discourage local programs from serving these important adult learning goals. Yet in spite of this NRS limitation, local programs do serve these adult learners and accept that the reporting system will not give them credit for this work.

In 2002, the National Academies of Science, Board on Testing and Assessment (BOTA) published their report entitled *Performance Assessments for Adult Education: Exploring the Measurement Issues*.  
[http://books.nap.edu/openbook.php?record\\_id=10366&page=1](http://books.nap.edu/openbook.php?record_id=10366&page=1)

The report was the culmination of BOTA’s discussions with researchers and practitioners regarding adult education assessment issues including alignment of performance assessment tasks to specific learning goals. A recurring comment warned that the individual states did not have the funds to develop such performance assessments.

**Recommendation:** The Secretary convene a panel of experts to revisit the 2002 (BOTA) report and to recommend to the Secretary strategies for developing those performance assessment protocols and providing the technical assistance and professional development to enable the states to use performance assessment with appropriate adult project learners.

**Issue: Tracking Adult Learners Over Longer Periods of Time and Collecting Longitudinal Data** In order to demonstrate the impact of adult basic education and adult English language acquisition, we need a better understanding of what happens to the adult learner in the longer term. Using existing data, we do not know what happens to adult learners when they leave or complete adult education. In practice, it is challenging to track adult learners both while they are in the program and after they leave—the burden for collecting longitudinal data on adult learners cannot be placed on the provider, but instead should be placed on the state and federal agencies. Many states are also prohibited by State law or State policy from using Social Security numbers to track education, training, and work outcomes. A means for collecting these data needs to be identified and used.

**Recommendation:**

- Identify the data we need to better understand what happens to adult learners, the impact of the adult education and literacy system, and the additional supports adult learners may need later on.
- Identify and implement the means for states to connect the NRS with other longitudinal data systems in education and labor and ensure that adult education is a part of those systems.
- Collect these data using methods that do not place the burden for longitudinal data collection on the provider.
- Convene a diverse panel of experts to provide clarification and guidance to the Secretary on how states can track adult education students into the labor market, high school equivalency coursework, or postsecondary education using linked administrative records without violating FERPA or the privacy of individuals.

**Issue: Tracking Educational Gains and Outcomes of All Students**

Currently, the NRS only requires providers to report on a student's progress toward their individually-determined goal and to report academic learning gains, as this is the default measure for students who have not specified a goal. Therefore, all other core measures are tracked only for students who report a goal related to the measure. Transitions from adult education into employment or postsecondary, for example, are only measured for those who report having such goals when they enter an adult education program.

The current way of reporting limits the ability of states to demonstrate the real impact of their adult education system, since students may make educational gains or achieve outcomes that they did not set as goals. Since few students enter adult education seeing themselves as college material, the number of students for whom transitions are measured is quite small and does not reflect the impact that adult education programs can positively influence student aspirations. In addition, it ignores the fact that many adult education students enter the programs with multiple goals, some of which will take longer to realize. The current way of measuring outcomes also makes it difficult to compare state performance since some states may be less ambitious than others in working with students on setting higher goals.

The NRS should allow reporting of multiple outcomes for all students so that adult education programs that help students make gains can be fairly credited and states can be compared on an equal playing field. Many providers currently have the ability to measure outcomes for all students through survey collection or data matching. This recommendation is aligned with one of many stated goals of NRS: to create a national set of data on the Federal adult education and literacy program to demonstrate its effectiveness.

**Recommendation:** Measure all core outcomes for Title II participants (educational gains, entered employment, retained employment, receipt of secondary school diploma or GED, and entered postsecondary education or training) including progress toward their goal. This will establish a performance baseline. Programs should continue to be required to work with students to establish educational and employment goals, but these goals should not be used in the NRS to establish the denominator for measuring performance on core outcomes. Adding this reporting requirement would not create more burden for providers, since, in many cases, these data are already collected.

Furthermore, the requirement would not prevent students from setting individual goals and tracking their progress toward those goals.

**Issue: How Employment-related Outcomes Are Measured**

Allowing certificates as documentation of learning outcomes can be a powerful incentive for WIA Titles I and II alignment and other national/state collaboration. It could also bring workforce/workplace AE programs back into the National Reporting System, helping our programs address Congress and Administration priorities for the linking of Adult Education and Economic Development.

**Recommendation:** Convene a panel of experts to establish benchmarks / momentum points that demonstrate student workforce readiness and to examine whether workforce readiness credentials should be incorporated into the NRS as outcome measures.

**In General:** Move toward better alignment of performance measures and assessment strategies across federal education and training programs, including WIA Titles I and II.