



National Coalition For Literacy

NCL Response to OVAE Recommendations for NRS Reform

Issue 1: Identifying Learner Cohorts for Employer-Related Outcomes

OVAE Recommendation: Automatically designate *all* students who are unemployed and in the labor force as the cohort for which “entered employment” must be tracked. Automatically designate *all* students who enter the program employed as the cohort for which “retained employment” must be tracked.

Discussion: In states where it is not easy to verify employment, and for large programs in these states, this is a significant implementation issue. It may force some states to address data matching issues. For programs, it significantly increases the cohort size and thus the breadth of data to collect. If these state and/or local burdens are created, and if no additional funding is allocated for implementation, then these states and programs must use existing funds to address the burden. This will result in fewer students served and less professional development that is responsive to practitioners’ instructional needs.

In particular, this recommendation and the others that follow could place a burden on the professional development and technical assistance systems as funding, staff time and resources will need to be reallocated to provide sufficient training to implement changes. Experience tells us that as accountability demands have increased, some states shift the focus of professional development away from responsive professional development to accountability training. While both responsive professional development and accountability training are important, we do not believe states should be put into a position to leverage professional development funds to train teachers on how to improve counting and tracking of students. Additional funds separate from professional development dollars should be provided to implement NRS changes.

Coalition Position: The Coalition supports this recommendation in principle, but only if the burden for implementing this change does not fall primarily on direct-service programs or states without additional funding. In particular, the costs related to implementing this change should not come at the expense of funds currently used to provide services to students and professional development for teachers.

Issue 2: Identifying Learner Cohorts for Postsecondary Education Follow Up

OVAE Recommendation: Automatically designate *all* students who have earned a GED, have a secondary credential, or are enrolled in a class specifically designed for transitioning to community college (e.g., bridge program, college readiness), as the cohort for which “entry into postsecondary education” must be tracked.

Discussion: The Coalition is concerned about placing students into the cohort on “entry into postsecondary education” for whom that is not their goal. While this would significantly increase the size of the cohort, it sets an artificial and incorrect level of those whose goal is “entry into postsecondary education.” Thus, percentages of those who achieve that goal could decrease significantly because many who were automatically designated with that goal never planned on entering postsecondary in the first place. This could end up showing a significant drop in percentages of those who achieve the goal. For programs, especially large programs in states with data match issues, this recommendation presents significant implementation issues for tracking student entry into postsecondary education.

Second, the Coalition is concerned about the exclusive focus on postsecondary education. Adults choose among many paths to improve their skills, postsecondary education being one of several options.

Coalition Position: The Coalition supports this recommendation in principle under these two conditions:

- The burden for implementing this change, in this case being verification of postsecondary, does not fall primarily on direct-service programs or states without additional funding. In particular, the costs related to implementing this change should not come at the expense of funds currently used to provide services to students and professional development for teachers.
- The category is expanded to include apprenticeship, vocational, and other integrated education and training programs. Define the category beyond the scope of a two or four year college.

Issue 3: Identifying Learner Cohorts for Secondary Credential Follow Up

OVAE Recommendation: Match GED test records for all students who take tests during the year to calculate a pass rate. For States with adult high schools, report the number of students in high ASE who obtain a high school diploma. For States with EDP, report the number of students enrolled in the assessment phase who obtain a high school diploma.

Coalition Position: The Coalition supports this recommendation in principle, but only if the burden for implementing this change does not fall primarily on direct-service programs or states without additional funding. In particular, the costs related to implementing this change should not come at the expense of funds currently used to provide services to students and professional development for teachers.

Issue 4: Using Additional Measures of Additional Skill Gains

OVAE Recommendation: For this issue, OVAE did not present a recommendation for consideration, but instead outlined the challenges related to developing additional methods of measuring educational gain, including a presentation by Dwayne Norris of AIR on testing issues.

Discussion: The options that OVAE presented and the problems implementing them only examined the existing testing system and did not consider other ways to address the issue of additional measures of educational skill gains. The Coalition recommends that OVAE look outside of the existing methods and examine ways it could integrate performance assessment with project learners. Project-based learning and performance assessment for project learners would help address the issue of showing progress with project learners and lower-skilled adults.

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

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.

Coalition 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.

While we realize this may in fact be a multi-year goal, we believe it is important enough to begin work on it this year.

Issue 5: Refining NRS Outcome Measurement for GED Prep Students

OVAE Recommendation: Create a separate level for GED prep students that includes all students who score at the secondary level on any NRS-approved test battery. Educational gain is not reported for these students, and they are not counted in calculation of education gain for any NRS level. The only reportable NRS outcome for these students is attainment of a secondary credential.

Discussion: If all students who score at the secondary level are entered into this new level for GED prep, programs may be then counting students who already have a secondary credential. GED prep students who do not already have a secondary credential would still need to be determined. Additionally, some states give the Spanish version of the GED test. Will this new level also include ESL test takers? Last, how do we guard against inadvertently making this focus so narrow that it does not acknowledge the shift in the field to preparing students for postsecondary education or employment, and not just secondary education credential attainment?

Coalition Position: The Coalition supports continuing to develop this recommendation in principle, but only if the burden for implementing this change does not fall primarily on direct-service programs or states without additional funding. We also recognize that there are several factors to consider; we are willing to respond to further details as they are developed.

Issue 6: Exploring Progress and Success in Postsecondary Education

OVAE Recommendation: Require programs with Integrated Education and Training (IET) models to track progress toward and completion of a credential in the program of study in which the student is enrolled.

Discussion: While we support the Department's interest in exploring the progress and success of adult education students in postsecondary education and training, we are concerned that the current proposal—to require programs with Integrated Education and Training models to track progress toward and completion of a credential in the program of study in which the student is enrolled—will serve as a disincentive for more programs and states adopting this model. Currently, very few programs and states offer IETs, but interest in adoption is quite high. Therefore, we are resistant to anything that will impede more programs from innovating in this area.

Coalition Position: Instead of adopting this recommendation, we hope OVAE would provide funding for research on postsecondary success and completion measures among states and programs that are already implementing IET models, as well as other models that focus on postsecondary transitions and success, including bridge programs or concurrent programs that have a stronger academic focus. Based on this research, OVAE will have more information on which to determine how to best track adult education students in postsecondary education and training.
