SUPPORTING ENHANCEMENTS TO THE NRS—
YOUR OPPORTUNITY TO CONTRIBUTE

Jody Angelone
Staff Training & Development Coordinator for the Ohio Professional Development Network. The Ohio State University.

Sharon Bonney
Chief Executive Officer, COABE

Anson Green
Senior Manager, Economic Opportunity. Tyson Foods

Laurie Kierstead-Joseph
Acting Vice President, Adult Basic Education for College & Career Division. Pima Community College

COABE

NRS Comment Period

Today's Presenters

Laurie Kierstead-Joseph Sharon Bonney Anson Green Jody Angelone

Session Objectives

-Why this is important

-What teachers and administrators are saying and doing

-How you can contribute to the NRS public comment

-How the process works and examples

-What leaders and practitioners across the country are doing and saying

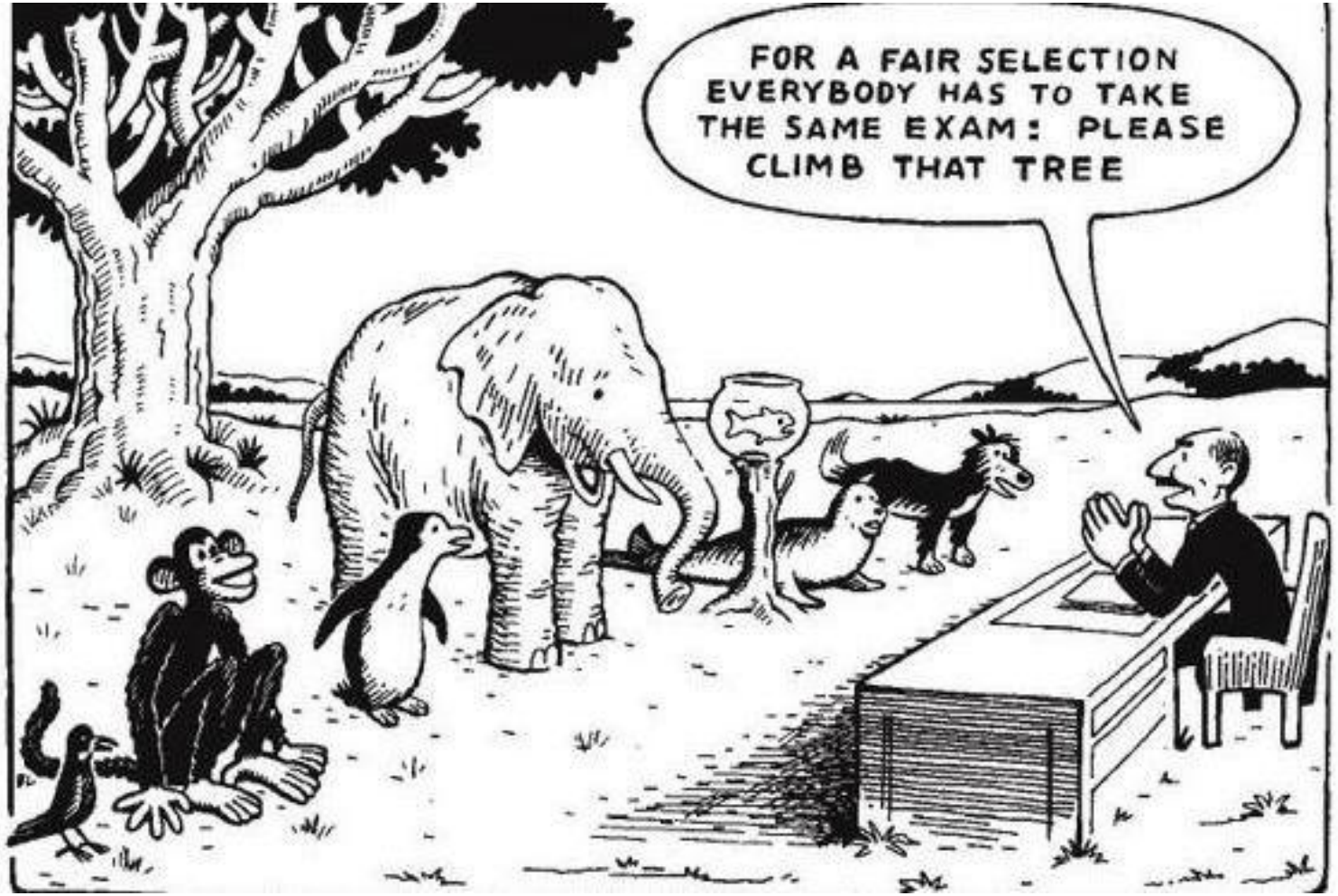
-Next steps you can take

Why Is This Important?

Anson Green

COABE 2020 Outstanding Administrator of the Year

Senior Manager
Economic Opportunity Tyson Foods



Why Is This Important?

- Importance of performance measurement
- System integration with workforce boards, other partners, employers
- “Treasure what you measure”
- Keeping up with enhancements in teaching and learning
- What the pandemic is teaching us
- The value of local perspectives
- Your opportunity for influence

Overview of the Opportunity

What Is a Public Comment?

- A government request to set aside time to receive feedback on proposed policy, rules, regulations and guidance, usually upon documents.
- Required by the Administrative Procedures Act of 1946 requires federal agencies keep the public informed.

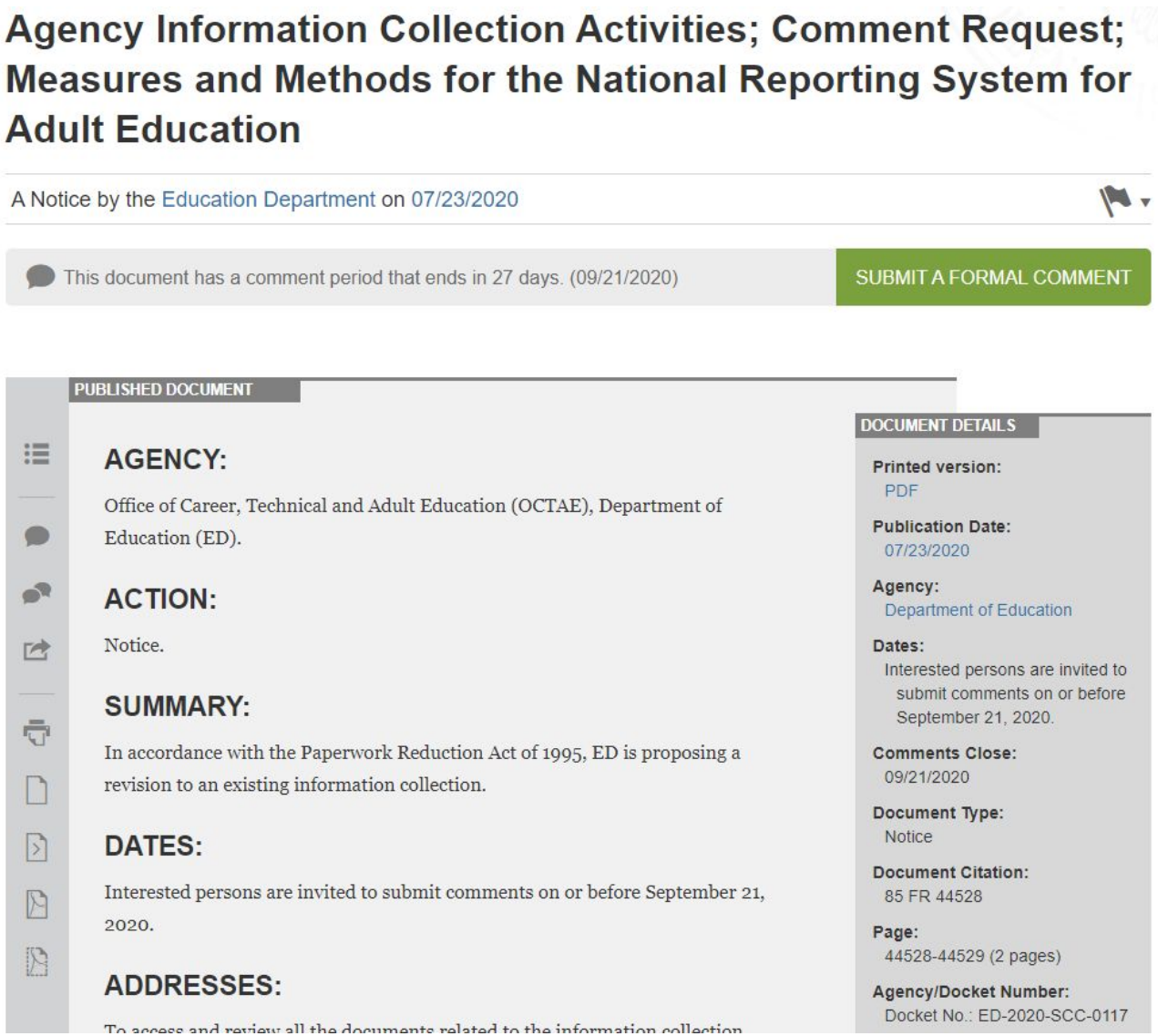
How The Process Works

Federal agencies are legally obligated to allow public comments and take into consideration any comments received, as well as reply to all comments when writing the final regulation, or document.

Comment Request—

Measures and Methods for the National Reporting System for Adult Education

Docket Number: ED–2020–SCC–0117



Agency Information Collection Activities; Comment Request; Measures and Methods for the National Reporting System for Adult Education

A Notice by the Education Department on 07/23/2020

This document has a comment period that ends in 27 days. (09/21/2020)

SUBMIT A FORMAL COMMENT

PUBLISHED DOCUMENT

AGENCY:

Office of Career, Technical and Adult Education (OCTAE), Department of Education (ED).

ACTION:

Notice.

SUMMARY:

In accordance with the Paperwork Reduction Act of 1995, ED is proposing a revision to an existing information collection.

DATES:

Interested persons are invited to submit comments on or before September 21, 2020.

ADDRESSES:

To access and review all the documents related to the information collection

DOCUMENT DETAILS

Printed version:
PDF

Publication Date:
07/23/2020

Agency:
Department of Education

Dates:
Interested persons are invited to submit comments on or before September 21, 2020.

Comments Close:
09/21/2020

Document Type:
Notice

Document Citation:
85 FR 44528

Page:
44528-44529 (2 pages)

Agency/Docket Number:
Docket No.: ED-2020-SCC-0117

What Is the Request?

- Request from U.S. Department of Education, Office of Career, Technical, and Adult Education (OCTAE)
- Feedback requested on:
  - NRS Table IV and Notes
  - New Table 99
- Due September 21, 2020

Local Perspective

What teachers and administrators in Arizona are saying and doing

Laurie Kierstead-Joseph
Acting Vice President, Adult Basic Education for College & Career Division.
Pima Community College

The Process in Detail

How adult education teachers and administrators can contribute to the NRS public comment

Anson Green
Senior Manager
Economic Opportunity Tyson Foods

Finding the Proposed Revisions and Instructions

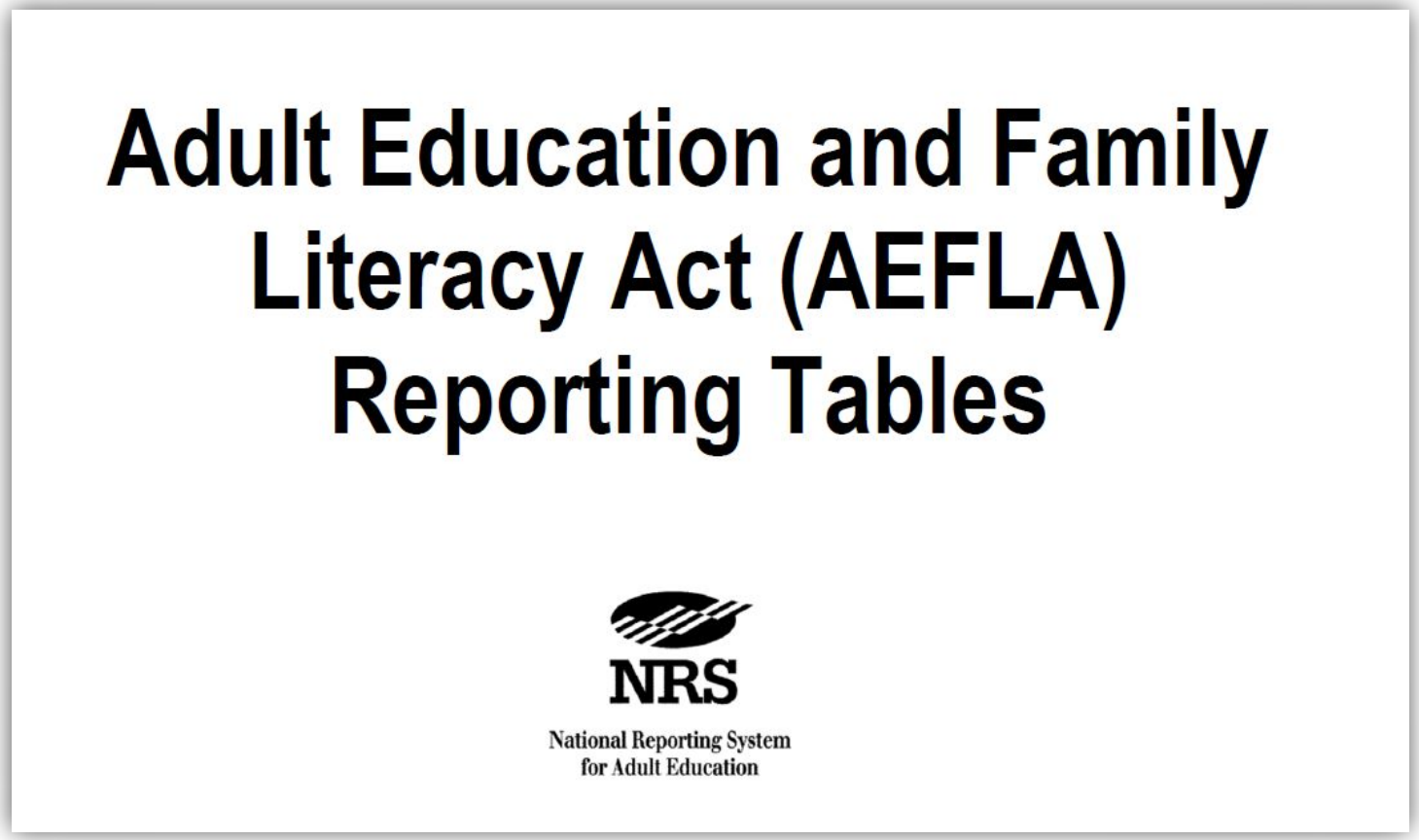
Federal Notification

https://www.federalregister.gov/documents/2020/07/23/2020-15990/agency-information-collection-activities-comment-request-measures-and-methods-for-the-national

Draft Tables

https://beta.regulations.gov/docket/ED-2020-SCC-0117/document?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=

What Documents Are Open for Public Comment?



Draft Tables

Table IV

Revised

Revised

Table 4
Measurable Skill Gains (MSG) by Entry Level

Enter the number of participants for each category listed, total attendance hours, number achieving at least one educational functioning level gain, number who attain a secondary school diploma or its recognized equivalent, and periods of participation outcomes.

	First Period of Participation									All Periods of Participation				
Entering Educational Functioning Level (EFL)	Number of Participants	Total Number of Participants Excluded from MSG Performance	Total Attendance Hours for all participants	Number who achieved at least one EFL gain	Number who attained a secondary school diploma or its recognized equivalent	Number of IET participants who achieved an MSG other than EFL gain and secondary school diploma	Number Separated Before Achieving Measurable Skill Gains	Number Remaining in Program without Measurable Skill Gains	Percentage Achieving Measurable Skill Gains	Total number of Periods of Participation	Total number of Periods of Participation in which Participants achieved at least one EFL gain	Total number of Periods of Participation in which a secondary school diploma or its recognized equivalent was attained	Total number of IET Periods of Participation in which Participants achieved an MSG other than EFL gain and secondary school diploma	Percentage of Periods of Participation with Measurable Skill Gains
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)
ABE Level 1														
ABE Level 2														
ABE Level 3														
ABE Level 4														
ABE Level 5														
ABE Level 6														
ABE Total														
ESL Level 1														
ESL Level 2														
ESL Level 3														
ESL Level 4														
ESL Level 5														
ESL Level 6														
ESL Total														
Grand Total														

Measure Skills Gains

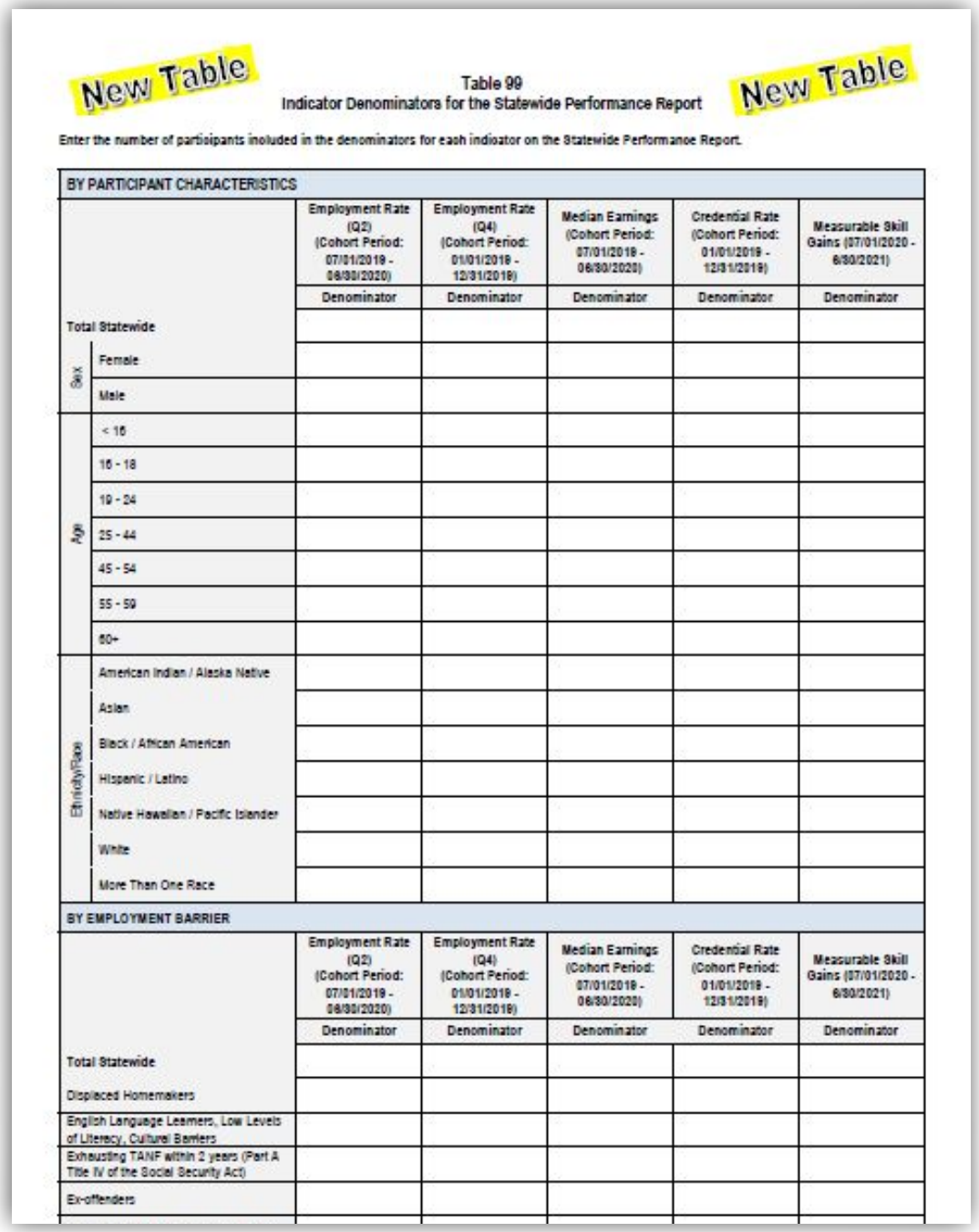
EFL Gain- Pre/post-test
Exit then entry into postsecondary education
Obtainment of a high school diploma or equivalency
Secondary or post-secondary transcript
Progress towards milestones
Passing technical/occupational knowledge based exam

Table I

Instructions for Completing Table 4

- Use participant's pretest score for the 1st entry of a program year for initial placement in this table.
- For the purposes of reporting measurable skill gain on Tables 4, 4C, 8, and 10, each program entry per participant during the reporting period is considered a period of participation.
- Count each participant only once in columns E through H. Total number of participants in column B should equal corresponding total number of participants in other NRS tables. Report the most recent measurable skill gain for a participant who achieved more than one measurable skill gain during a period of participation.
- The number in Column C is the number of participants who are being excluded from MSG performance due to the exclusion scenarios listed in OCTAE Program Memorandum 17-2 Attachment 2, Table A. No values associated with these participants should be entered into columns E-I.
- The number in column E is the number of participants who completed one or more Educational Functioning Level (EFL) gains as measured 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 high 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.
- Column F is the number of participants who attained a secondary school diploma or its recognized equivalent.
- Column G is the number of IET participants who achieved an MSG via Secondary or Postsecondary Transcript, Progress Toward Milestones, or Passing Technical/Occupational Skills Exam.
- Enter only the most recent achievement, if attained, per participant in column E or column F or column G. Participants should have an achievement counted in only one of these columns.
- Column H is the number of participants who achieved no measurable skill gain and exited the program. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services (services do not include self-service, information-only services or activities, or follow-up services), and there are no plans to provide the participant with future services.
- Column I is number of participants who remain enrolled and achieved no measurable skill gain.
- Column *B should equal Column C + E + F +* G + H +I.
- Column J is calculated using the following formula: (Column J) = $\frac{\text{(Column E + Column F + Column G)}}{\text{(Column B – Column C)}}$
- Column K is the total number of periods of participation for each participant. A participant may have more than one period of participation. Do not include periods of participation that are excluded from MSG performance due to the exclusion scenarios listed in OCTAE Program Memorandum 17-2 Attachment 2, Table A. No values associated with these periods of participation should be entered into columns K-N.
- Column L is the Total number of Periods of Participation in which at least one educational functioning level gain was achieved. Multiple outcomes are permissible for individual participants with more than one period of participation. Although participants may achieve more than one gain per period of participation, only one gain for a participant per period of participation is reported in EITHER column L or column M or column N.
- Column M is the Total number of Periods of Participation in which a secondary school diploma or its recognized equivalent was attained. Multiple outcomes are permissible for individual participants with more than one period of participation. Although participants may achieve more than one gain per period of participation, only one gain for a participant per period of participation is reported in EITHER column L or column M or column N.
- Column N is the Total number of IET Periods of Participation in which an MSG was achieved via Secondary or Postsecondary Transcript, Progress Toward Milestones, or Passing Technical/Occupational Skills Exam. Multiple outcomes are permissible for individual participants with more than one period of participation. Although participants may achieve more than one gain per period of participation, only one gain for a participant per period of participation is reported in EITHER column L or column M or column N.
- Column O is calculated using the following formula: (Column O) = $\frac{\text{(Column L+ Column M + Column N)}}{\text{(Column K)}}$
- Period of Participation: For the Measurable Skill Gains indicator, a new period of participation is counted each time a participant enrolls—even if both enrollments occur within the same program year. It is not necessary to wait until the participant exits the program in order to count a measurable skill gain, because the measurable skill gains indicator is not an exit-based indicator. The skill gain may be counted as soon as it is earned at any point during the participation period of the program year in which it was earned. A person with more than one period of participation in a program year is counted separately for each period of participation in both the numerator and denominator of each applicable performance indicator. Therefore, the person is counted multiple times— once for each period of participation. Please see OCTAE program memorandum 17-2 for examples of counting periods of participation.

New Table, 99



New Table

Table 99
Indicator Denominators for the Statewide Performance Report

New Table

Enter the number of participants included in the denominators for each indicator on the Statewide Performance Report.

BY PARTICIPANT CHARACTERISTICS		Employment Rate (Q2) (Cohort Period: 07/01/2019 - 06/30/2020)	Employment Rate (Q4) (Cohort Period: 01/01/2019 - 12/31/2019)	Median Earnings (Cohort Period: 07/01/2019 - 06/30/2020)	Credential Rate (Cohort Period: 01/01/2019 - 12/31/2019)	Measurable Skill Gains (07/01/2020 - 6/30/2021)
		Denominator	Denominator	Denominator	Denominator	Denominator
Total Statewide						
Sex	Female					
	Male					
Age	< 16					
	16 - 18					
	19 - 24					
	25 - 44					
	45 - 54					
	55 - 59					
	60+					
Ethnicity/Race	American Indian / Alaska Native					
	Asian					
	Black / African American					
	Hispanic / Latino					
	Native Hawaiian / Pacific Islander					
	White					
	More Than One Race					

BY EMPLOYMENT BARRIER	Employment Rate (Q2) (Cohort Period: 07/01/2019 - 06/30/2020)	Employment Rate (Q4) (Cohort Period: 01/01/2019 - 12/31/2019)	Median Earnings (Cohort Period: 07/01/2019 - 06/30/2020)	Credential Rate (Cohort Period: 01/01/2019 - 12/31/2019)	Measurable Skill Gains (07/01/2020 - 6/30/2021)
	Denominator	Denominator	Denominator	Denominator	Denominator
Total Statewide					
Displaced Homemakers					
English Language Learners, Low Levels of Literacy, Cultural Barriers					
Exhausting TANF within 2 years (Part A Title IV of the Social Security Act)					
Ex-offenders					

You’re Not Limited in Your Comment

Comments can be made on other aspects o

Examples

- Educational functioning levels
- High school equivalency/ diploma measu
- Definitions for postsecondary education
- Distance education reporting

Submitting a Comment

Who Can Make a Public Comment?

- Federal law allows ordinary people to participate in the rule-making process.
- Any person, groups, organizations — including non-profit organizations and lobbying groups — or other agency with a legitimate interest can make a public comment.

Example

“Comment”

Comments: Regarding proposed § 463.37(a)(1) that within the overall scope of an integrated education and training program the three required components be instructionally balanced proportionately across the three components, particularly with respect to improving reading, writing, mathematics, and English proficiency of eligible individuals, one commenter questioned the clarity of the phrase “instructionally balanced proportionately” and stated that requiring the three components to be instructionally balanced proportionately would limit States' flexibility to design integrated education and training programs that are responsive to the needs of students, employers, and local economies.

“Discussion”

Discussion: We appreciate the commenter's concern for maintaining adequate flexibility to design integrated education and training programs that are responsive to the needs of students, employers and, local economies. We note that in proposing § 463.37(a) we stated that § 463.37(a)(1), § 463.37(a)(2), and § 463.37(a)(3) were meant to be considered within the overall scope of an integrated education and training program. We do not, therefore, agree that this limits States' flexibility to design integrated education and training programs that are responsive to the needs of students, employers, and local economies. However, we also recognize that the proposed phrasing of § 463.37(a)(1) may not have adequately stated our intent that all three required components be of sufficient quality and intensity.

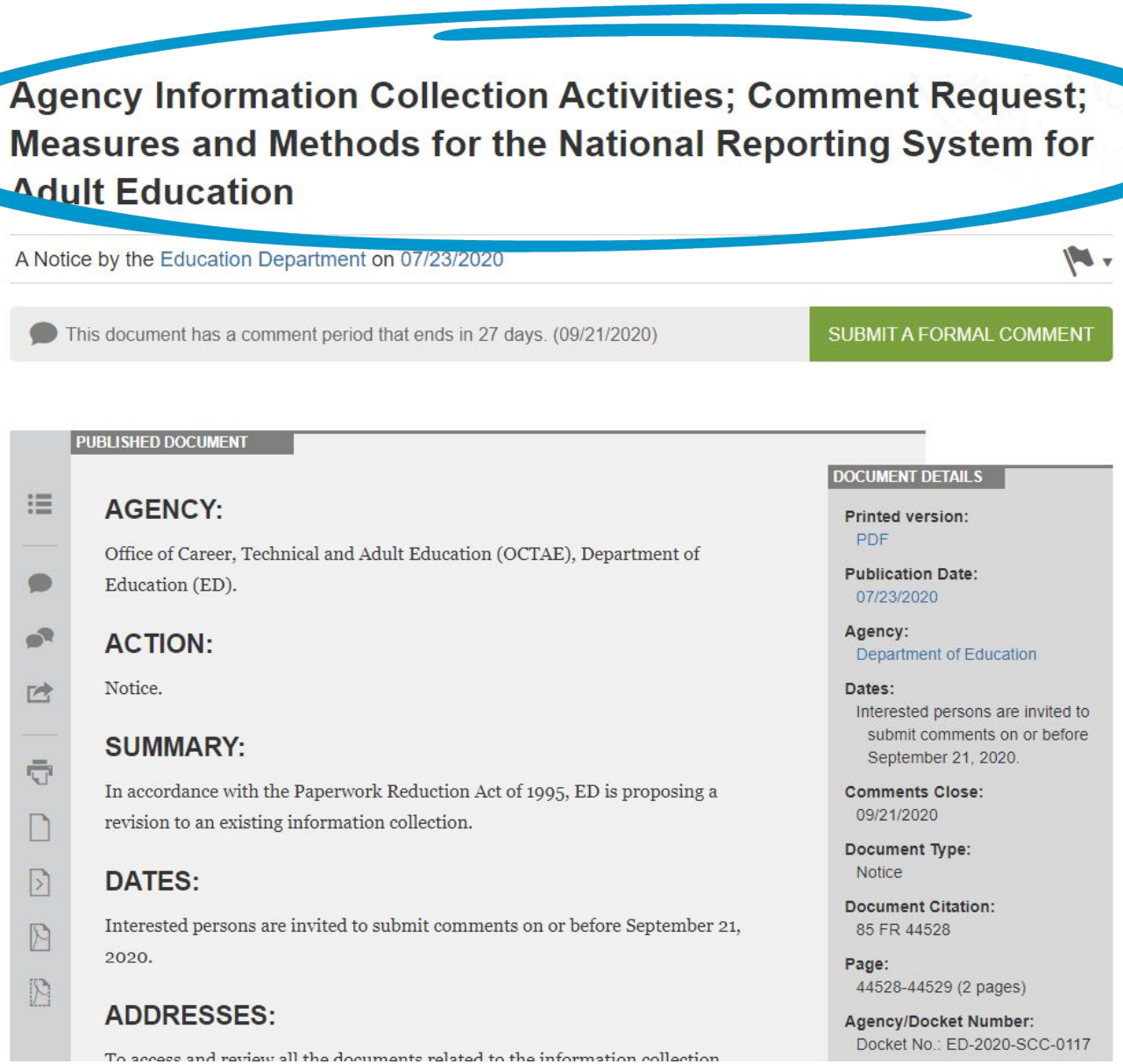
“Change”

Change: We have revised § 463.37(a)(1) to more clearly state our intent that within the overall scope of an integrated education and training program, all three required components must be of sufficient quality and intensity and must be based on the most rigorous research available.

Writing a Comment

Tips for Writing a Comment

- Be very familiar with the rule, regulation, or guidance and the issue.
- Establish your expertise in the area you are commenting on, and support your comment with research, data, or empirical information.
- Use headings that state the regulation name and docket ID number.



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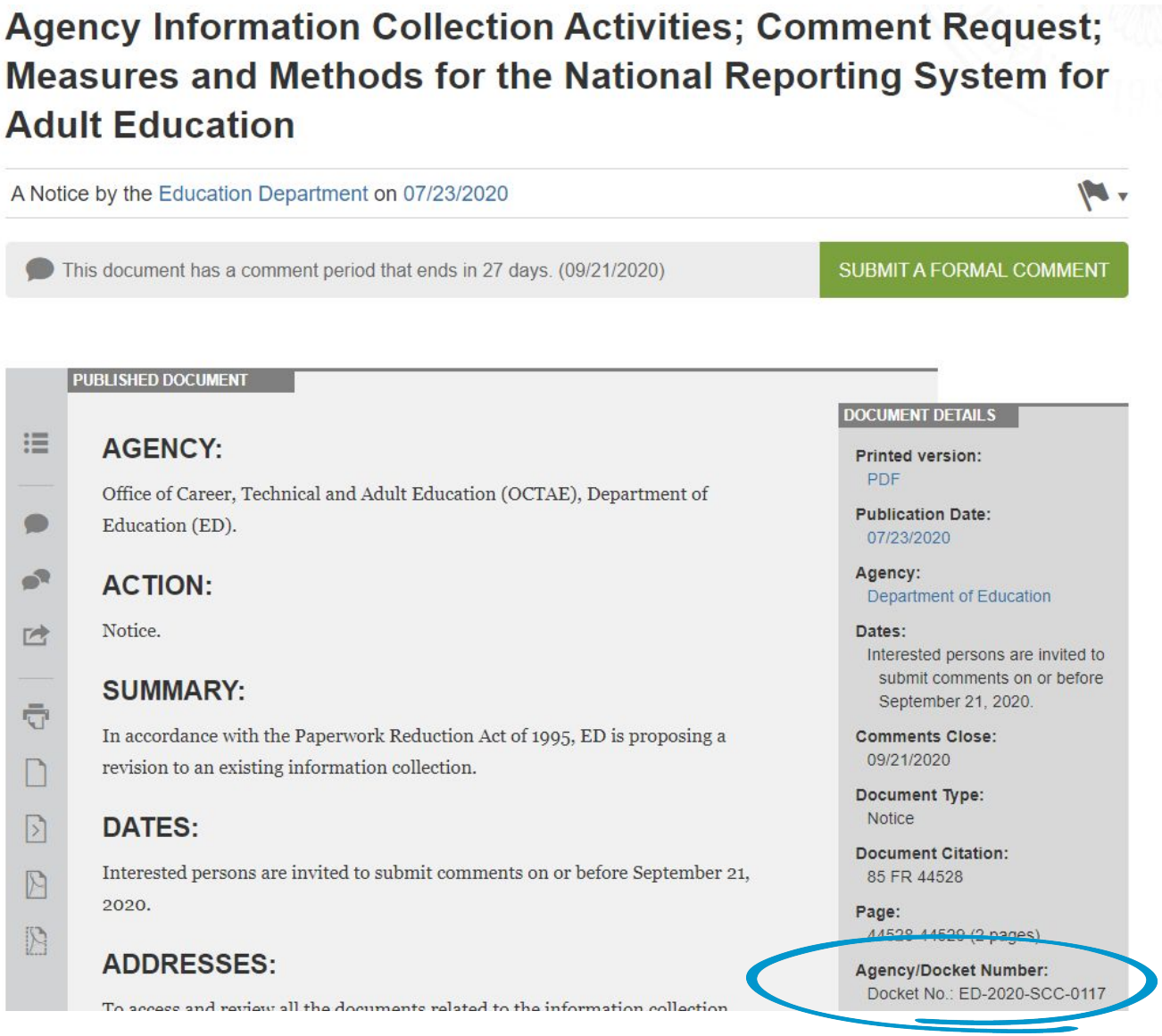

Regulation Name and Docket ID Number

Be As Clear as Possible

- Define your objectives
- Use clear organization and formatting, and precise language
- Present an argument, supported with data if needed, and show how this is related to the document you're discussing
- Cite or include sources, if you refer to outside material in your comment.

How To Track Your Comments

Go to https://www.regulations.gov/help, and follow “find a comment” in the left navigation bar

Resources

For writing a comment

- Template: https://publiccommentproject.org/comment-templates
- Sample Letter and Instructions from ImmigrantSurvivors.org:

https://static1.squarespace.com/static/5b9f1d48da02bc44473c36f1/t/5bdb82dcb8a0458599d29e22/1541112540438/AIS_Public-Charge-DV_SA-Sample-Comment-Template.pdf

Federal resources for cross referencing

- **NRS Guide:** https://www.nrsweb.org/policy-data/nrs-ta-guide
- **Performance Regulation:** 20 CFR Parts 676, 677, and 678. https://www.govinfo.gov/content/pkg/FR-2016-08-19/pdf/2016-15977.pdf
- **Guidance**: OCTAE Program Memorandum 17-2: Performance Accountability Guidance for WIOA: https://www.nrsweb.org/sites/default/files/Program%20Memorandum%2017-2%20OCTAE.pdf

Reporting

- WIOA Statewide and Local Performance Report Template (9169): https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/ETA_9169.pdf
- WIOA Participant Individual Record Layout (PIRL): https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/ETA_9170_12.1.17.pdf

Questions

Email Us!

We are here to help answer questions you might have. Contact us today.

NRSComments@coabe.org

Access more resources:
https://coabe.org/NRSComments/