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
FEEDBACK

YOUR OPINION IS IMPORTANT

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.
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)

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 ensure and review all the documents related to the information collection.

Docket Number: 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


Draft Tables

What Documents Are Open for Public Comment?

Adult Education and Family Literacy Act (AEFLA) Reporting Tables

National Reporting System for Adult Education
Draft Tables
Table IV

| Entering Educational Functioning Level (EFL) | Number of Participants | Total Number of Participants Excluded from EBG Performance | Total Attendance Hours for all participants | Number who achieved at least one EFL gain | Number of EFL participants who achieved an EBG or other than EFL gain and secondary school diploma or its recognized equivalent | Number of Participants Remaining in Program without Measurable Skill Gains | Percentage of Measurable Skill Gains | Total number of Periods of Participation | Total number of Periods of Participation in which a secondary school diploma or its recognized equivalent was attained | Total number of WET Periods of Participation in which Participants achieved an EBG or other than EFL gain and secondary school diploma | Percentage of Periods of Participation with Measurable Skill Gains |
|---------------------------------------------|------------------------|----------------------------------------------------------|-------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|--------------------------------------|----------------------------------------|---------------------------------------------------------------------------------|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------|
| ABE Level 1                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| ABE Level 2                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| ABE Level 3                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| ABE Level 4                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| ABE Level 5                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| ABE Level 6                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| ABE Total                                   |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| EBL Level 1                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| EBL Level 2                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| EBL Level 3                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| EBL Level 4                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| EBL Level 5                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| EBL Level 6                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| EBL Total                                   |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
| Grand Total                                 |                        |                                                          |                                           |                                     |                                                                                                |                                                                       |                                       |                                       |                                                                                 |                                                                                 |                                                                                 |                                       |
## Measure Skills Gains

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>EFL Gain- Pre/post-test</td>
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<tr>
<td>Exit then entry into postsecondary education</td>
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<tr>
<td>Obtainment of a high school diploma or equivalency</td>
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<tr>
<td><strong>Secondary or post-secondary transcript</strong></td>
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<tr>
<td>Progress towards milestones</td>
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<tr>
<td><strong>Passing technical/occupational knowledge based exam</strong></td>
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</tbody>
</table>
Instructions for Completing Table 4

- Use participant's prior score for 1st entry of a program year for initial placement in this table.
- For the purposes of reporting measurable skill gain on Tables 4A, 4B, and 4C, each program year per participant during the reporting period is considered a period of participation.
- Count each participant only once in column E through H; Total number of participants in column G should equal corresponding total number of participants in other MME 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 D is the number of participants that are excluded from MME performance due to the exclusion criteria listed in OCTAE Program Memorandum 17-2 Attachment 2, Table A. No records associated with these participants should be entered into column E.
- 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 pretest with the participant's EFL as measured by a participant's posttest; or 2) for States that offer high school programs that lead to a secondary school diploma or its recognized equivalent, any EFL gain may be measured through the mining of credits or Carnegie units; or 3) States may report an EFL gain for participants who cut the program and enroll in postsecondary education or training during the program year.
- Column F is the number of participants who entered a secondary school diploma or its recognized equivalent.
- Column G is the number of participants who achieved more than one 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 provided services (services do not include self-service, information only services, or follow-up services), and there are no plans to provide the participant with future services.
- Column H is the number of participants who remained enrolled and achieved no measurable skill gain.
- Column I should equal Column E + F + G + H.

| Column I is calculated using the following formula: | (Column E + Column F + Column H) |

- Column J 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 MME performance due to the exclusion criteria listed in OCTAE Program Memorandum 17-2 Attachment 2, Table A. No records associated with these periods of participation should be entered into column K.
- 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 particular period of participation is reported in either column L or column M.
- 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 particular period of participation is reported in either column L or column M.
- Column N is the total number of periods of participation in which an MME was achieved via Secondary or Postsecondary Transcript, Program 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 particular period of participation is reported in either column L or column M.

| Column I = Column L + Column M + Column N |

- Period of Participation: For the Measureable Skill Gain indicator, a new period of participation is counted each time a participant enters—only if both enrollment weeks occur within the same program year. It is necessary to count participant enrollment weeks but not program enrollment weeks. The program enrollment period is counted as one week if the program exists at any point during the period of participation. If two weeks are counted, the participant exits the program in order to count a measurable skill gain. Because the measurable skill gain indicators are not an exit-based indicator, the skill gain may be counted as soon as it is granted at any point during the period of participation 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 and is determined separately for 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.

OMB Control Number 3850-0037
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<table>
<thead>
<tr>
<th>BY PARTICIPANT CHARACTERISTICS</th>
<th>Employment Rate (14) (Cohort Period: 07/01/2019 - 06/30/2020)</th>
<th>Employment Rate (14) (Cohort Period: 07/01/2018 - 06/30/2019)</th>
<th>Median Earnings (Cohort Period: 01/01/2019 - 06/30/2020)</th>
<th>Credential Rate (Cohort Period: 01/01/2019 - 06/30/2020)</th>
<th>Median Income (Cohort Period: 01/01/2019 - 06/30/2021)</th>
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<tbody>
<tr>
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<td>Hispanic American African</td>
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<td>Asian / Native American</td>
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<td>Black / African American</td>
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<td>Hispanic / Latino</td>
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<td>Native Hawaiian / Pacific Island</td>
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<td>White</td>
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<td>More Than One Race</td>
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<td>BY EMPLOYMENT BARRIER</td>
<td>Employment Rate (14) (Cohort Period: 07/01/2019 - 06/30/2020)</td>
<td>Employment Rate (14) (Cohort Period: 07/01/2018 - 06/30/2019)</td>
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<td>Median Income (Cohort Period: 01/01/2019 - 06/30/2021)</td>
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<tr>
<td>Total Statewide</td>
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<td>Displaced Homemakers</td>
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<td>English Language Learner, Low Literacy, Limited English Proficiency</td>
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<td>Disenfranchised</td>
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</table>
You’re Not Limited in Your Comment

Comments can be made on other aspects of:

Examples

• Educational functioning levels
• High school equivalency/ diploma measurement
• 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.
“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.
Agency Information Collection Activities; Comment Request; Measures and Methods for the National Reporting System for Adult Education

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

Reporting
Questions
Email Us!
We are here to help answer questions you might have. Contact us today.

NRSCComments@coabe.org

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