

Response to Request for Comments regarding Docket ED-2020-SCC-0117, Changes to AEFLA Reporting Table IV of the NRS

My name is David Downes, Program Administrator for the Connecticut Association of Adult and Continuing Education (CAACE). I am a former director of the adult education program in West Hartford, Connecticut and Board member of the Coalition on Adult Basic Education (COABE).

The proposed changes to AEFLA Reporting Table 4 of the NRS seek to increase the number of indicators of skill gains for adult learners who participate in an Integrated Education and Training program. While the inclusion of alternate performance measures such as transcripts and knowledge-based exams is a commendable next step to measure student success, I would like to propose a natural extension of this logic to the acceptance of attainment of high school diplomas and their equivalents (including the National External Diploma Program, Credit Diploma Programs, and approved standardized assessments such as the GED, HiSet and TASC), so that all students who attain a diploma are counted in column F of Table 4, and not just those who have cleared other statistical hurdles.

For the current data reports in Table IV, participants are included in column F, "Number who attained a high school diploma or its equivalent," only if they also demonstrate an educational functioning level gain (column E) and who are shown to have postsecondary employment and/or further education. Therefore, the "Grand Total" in column F can be very inaccurate and not reflective of all the achievement happening in a given state.

Example: In Connecticut, a count by reporting adult education programs showed total of 1690 adult ed learners achieving a diploma in SY2018-19 via one of the three programs mentioned above that are offered in the state. Yet in the NRS AEFLA Reporting Table IV for the state, column F (<https://nrs.ed.gov/rt/ct/2018/table-4>) shows only 130 attained a diploma. Adult education programs work hard to overcome the educational and social hurdles that many of their learners experience, and the attainment of the educational goal of a diploma should be recognized whenever it is attained. Adult ed programs are responsible for these goal attainments, much more than they are responsible for actual postsecondary entries or employment earnings.

Thank you for your consideration of this request.