

The Iowa Department of Education (IDOE) appreciates the opportunity to submit comments on the proposed changes to the NRS. We agree that the proposed Table 99 would ensure more accurate reporting on Statewide Performance Reports and that the burden to implement this new table is negligible. IDOE thanks OCTAE for recognizing the need to allow additional skills gains for participants. Our Adult Education and Literacy State Director, however, has the following concerns regarding the proposed changes to Table 4:

Timeline: The ICR states that the proposed changes are to be effective July 1, 2021, and required to be included in the annual performance reports due on October 1, 2021.

This sets a precedent for effecting a change retroactively; the data would need to be collected during the year prior to the effective date, a year which has already begun without the mechanisms or training for the data to be collected in place.

The timeline will not allow consistent reporting across states.

Our data system will need to be tested to ensure accurate calibration to collect and/or calculate the most recent MSG..

Time is needed to train local program providers who will be responsible for the collection and proper entry of the data.

Time is needed to consider whether parallel changes would be needed on other tables, such as Table 4C, which reports outcomes for distance education students. Given the number of providers offering online instruction, we very well may see IET students reported as distance education students.