



NASDAE
National Association of State
Directors of Adult Education

Date: April 20, 2023

To: United States Department of Education

From: The National Association of State Directors of Adult Education (NASDAE)

Re: NASDAE Comments to OCTAE Regarding:

Measuring Educational Gain in the National Reporting System for Adult Education

Document Number: ED-2023-SCC-0034

The National Association of State Directors of Adult Education (NASDAE) (<http://nasdae.org/>) appreciates the opportunity to submit comments to the Office of Career, Technical, and Adult Education (OCTAE) regarding the measurement of educational gain for adult education participants.

NASDAE represents leadership in U.S. states and territories for programs authorized under Title II of the *Workforce Innovation and Opportunity Act* (WIOA).

NASDAE understands that the Department of Education is requesting to extend without change the process through which the Secretary reviews and approves assessments for allowability of recognition in the National Reporting System.

The lack of revision and updating of this process over many years has resulted in assessments that fail to capture the changes in the populations served and the changes in the uses of literacy, numeracy, and language in every day and workplace settings.

The current process of review and approval of publisher-developed assessment for adult education is not serving the field as envisioned. Although the market in adult education is small compared to the larger education field, the overly-burdensome approval process is a further narrowing and slowing of the effort to bring updated tests to the market. In fact, over ten years since the passage of the educational functioning level descriptors that was designed to spur new test development, the field still does not have tests aligned to those descriptors for half of our students: English language learners. This lack of alignment between curriculum and assessment is harming states' ability to meet our federally-required performance targets and demonstrate students' preparedness for further education, training, and employment.

The state directors of adult education depend upon reliable, updated, and standardized tests for federal reporting purposes as well as instructional decision-making. We also recognize the urgent and overdue need for more research and development into updated ways to monitor, assess, and report student growth. We urge the Department to begin a stakeholder engagement process immediately to evaluate the current process and design a more effective approach to approving assessments and assigning measurable skills gains.

For questions and additional information, you may contact me at ptyler@nasdae.org.

Sincerely,

Patricia H. Tyler
Executive Director