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To: U.S. Department of Education

From: National Association of State Directors of Adult Education (NASDAE)
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Subject: **NASDAE Comments:** Feedback on the Redesigning the Institute of Education Sciences

Docket ID: ED-2025-IES-0844

The National Association of State Directors of Adult Education (NASDAE) (<http://nasdae.org>) appreciates the opportunity to submit comments to the Institute for Education Sciences (IES) Request for Information ED-2025-IES-0844 on how to better meet the needs of state and local leaders, educators, parents, researchers, and state education and workforce development agencies.

NASDAE is a member organization that supports state leadership of the adult education program, authorized under Title II of the *Workforce Innovation and Opportunity Act* (WIOA), by providing professional development, informational resources, and networking opportunities for state and U.S. territory leaders and partners. NASDAE appreciates the opportunity to submit comments to the future of IES.

Adult education is an investment in the workforce of today and the future. The providers funded under Title II of WIOA help learners overcome educational attainment and earnings gaps and reduce the intergenerational impact of low educational attainment. Now more than ever as the economy shifts, adults need accessible and affordable opportunities to upskill for new challenges and prepare for further education, training, and employment. Youths who are still overcoming pandemic learning loss and disruptions to their education and work readiness need opportunities to re-engage in education, complete their secondary credential, gain employability skills, and prepare for their future. Parents and families need literacy, numeracy, and digital skills to make informed decisions about their children's education.

Adult education has been delivering on its promise for over 60 years. The National Reporting System (NRS) for Adult Education (nrs.ed.gov) houses over 44 million student records and 23 years of performance and fiscal data from the state administering agencies. As part of the One-Stop System of American Job Centers, WIOA Title II also serves jobseekers preparing them for employment, apprenticeships, and further training and serves local employers to close the skills gap and connect them to new talent pipelines. In Program Year 2023-2024, these programs served 1.26 million learners, 25 percent of whom were under the age of 25, 11 percent of whom already had a secondary credential and enrolled to boost their skills, and 100,000 of whom were incarcerated (see more data in [*Adult Education Works: An Investment in Workforce Development*](#), the most recent NASDAE info brief).

To the question of how IES can better meet the needs of state and local leaders, national leadership activities that are statutorily required in WIOA Sec. 242 are of great interest and utility to the state agencies that administer WIOA and Governor-level state workforce and economic development to guide planning and funding that is responsive to immediate and emerging sector and regional needs and trends.

WIOA Sec. 242(b) National Leadership Activities requires:

(b) REQUIRED ACTIVITIES.—The national leadership activities described in subsection (a) shall include technical assistance, including—

- (1) assistance to help States meet the requirements of section 116;
- (2) upon request by a State, assistance provided to eligible providers in using performance accountability measures based on indicators described in section 116, and data systems for the improvement of adult education and literacy activities;
- (3) carrying out rigorous research and evaluation on effective adult education and literacy activities, as well as estimating the number of adults functioning at the lowest levels of literacy proficiency, which shall be coordinated across relevant Federal agencies, including the Institute of Education Sciences; and
- (4) carrying out an independent evaluation at least once every 4 years of the programs and activities under this title, taking into consideration the evaluation subjects referred to in section 169(a)(2).

The Program for the International Assessment of Adult Competencies (PIAAC), conducted in the United States by the National Center for Education Statistics, is the most reliable and updated estimate of American's levels of literacy, numeracy, and digital problem-solving. No other survey has the scope and data collection capacity to provide the statutorily required national estimates and no other data collection provides *levels of literacy proficiency*. Other collections such as the American Community Survey provide the proxy indicator of educational attainment; one of the most insightful findings of the PIAAC Survey of Adult Skills was the pervasiveness of low literacy and numeracy skills in the United States, even among those who had achieved a secondary credential or more. ***NASDAE urges IES to continue to fund planned waves of data collection in the PIAAC study.***

In addition, the Small Area Estimates of PIAAC data that populate the state- and county-level Skills Maps (<https://nces.ed.gov/surveys/piaac/skillsmap/>) published by IES are invaluable resources for state-level planning and resource management. These maps inform the state agencies that administer WIOA Title II and partner agencies on the need for adult education and workforce development services and quality of life investments. ***NASDAE urges IES to continue to invest in the Small Area Estimates to refresh these maps with each wave of data collection and, in particular, to publish the estimates derived from the most recent data collection.***

The IES-led evaluations of adult education inform states on promising practices and programming models and are statutorily mandated to be conducted every four years. Most recently, the [National Study of the Implementation of Adult Education Under the Workforce Innovation and Opportunity Act](#) and [Assessing Evidence of Effectiveness in Adult Education: Study of Career Navigator Training](#) were commissioned.

Evaluations of this scope need to be continued to contribute to the knowledge base of what is working in adult education and workforce development and, furthermore, they need to be released in a timely manner to inform state-level policies about the administration of WIOA programming. Additionally, NASDAE

would welcome discretionary grant opportunities for research and policy studies that could yield insights from the vast body of data collected through the NRS which, when paired with other data sources such as state longitudinal data systems and federated data trusts, could inform state workforce development policies and actions. *NASDAE urges IES to continue to plan for these evaluations and ensure that their results are shared in a timely manner.*