



NASDAE

National Association of State
Directors of Adult Education

Date: December 19, 2025

To: U.S. Citizenship and Immigration Services, Department of Homeland Security

From: National Association of State Directors of Adult Education (NASDAE)
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Subject: **NASDAE Comments:** Notice of Proposed Rule Making

U.S. Citizenship and Immigration Services, DHS Docket No. USCIS–2025–0304

The National Association of State Directors of Adult Education (NASDAE) (<http://nasdae.org>) appreciates the opportunity to submit comments to the U.S. Citizenship and Immigration Services (USCIS) on the Notice of Proposed Rulemaking to rescind the 2022 public charge ground of inadmissibility regulations.

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.

Adult education has been delivering on its promise for over 60 years. The National Reporting System 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 is tightly aligned to State and local workforce priorities to serve jobseekers preparing for employment, apprenticeships, and further training and to serve local employers to close the skills gap and connect them to new talent pipelines. Furthermore, adult education is one of the few public workforce partners providing for the linguistic, civic, and economic integration of English language learners.

Federally funded, state administered programs like adult education rely on clear guidance in order to meet negotiated performance targets, fulfill the statutory mission of the program, and to do so in compliance with federal and state regulations and guidance. The Federal Register Notice USCIS-2025-0304 indicates that the agency intends to rescind the 2022 regulations through the current process and promulgate new guidance through a future process. Such a sequence would force adult education and many other federally funded, state administered programs to operate with potentially confusing and inaccurate interpretations of regulations, putting clients and local sub-recipients at unacceptable risk of non-compliance. ***Therefore, we urge the USCIS to promulgate regulations and guidance in advance of removing the existing policy in order for programs to communicate and implement any new guidance in an orderly and consistent manner.***