



NASDAE
National Association of State
Directors of Adult Education

Date: March 30, 2026

To: General Services Administration

From: National Association of State Directors of Adult Education (NASDAE)
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Subject: Information Collection 3090-0290, System for Award Management Registration Requirements for Financial Assistance Recipients

The National Association of State Directors of Adult Education (NASDAE) (<http://nasdae.org>) appreciates the opportunity to submit comments to the General Services Administration, **Docket GSA-GSA-2026-0001-0001**.

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 assist 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. In program year (PY) 2024-25, adult education served over 1.32 million learners.

Federally funded, state administered programs like adult education rely on clear, consistent 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 indicates that the agency intends to revise the certifications for SAM.gov to reflect current policy stances that overlap federal antidiscrimination laws, rendering this certification unnecessary and duplicative. Such a change would force federally funded, state administered programs to operate with potentially confusing and incomplete interpretations of regulations, putting clients and local sub-recipients at unacceptable risk of non-compliance. Therefore, ***we urge the GSA to continue with existing certifications that comply with all existing statute and regulation, including federal antidiscrimination law, in order for states to administer programs in compliance with federal law and in a consistent manner.***