



NASDAE
National Association of State
Directors of Adult Education

To: Office of Career, Technical, and Adult Education (OCTAE), Department of Education (ED)
From: The National Association of State Directors of Adult Education (NASDAE)
Date: April 30, 2026
Re: NASDAE **Comments** regarding Agency Information Collection Activities; Comment Request; Measures and Methods for the National Reporting System for Adult Education

Docket No.: ED-2026-SCC-0464

The National Association of State Directors of Adult Education (NASDAE) appreciates the opportunity to submit comments to OCTAE as stakeholder input regarding the National Reporting System (NRS) for the Adult Education and Family Literacy Act (AEFLA) State grant program.

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 45 million student records and 24 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 nearly 1.3 million learners.

Although the Department indicates that no change is proposed to the NRS at this time, NASDAE is submitting comments that were previously submitted (September 2023 on Docket No. ED-2023-SCC-0141) that have not yet been addressed. The issues listed below are still of interest to our members as they endeavor to administer the AEFLA program with compliance and high performance.

Consolidation of Rows on Table 5 and 5A. In 2024, OCTAE consolidated two rows on Tables 5 and 5A and applied the same consolidation to the tables that are subsets of Table 5, namely Tables 8, 9, 10, and 11. Yet the subset tables still do not fully mirror Table 5 as there is no “All Credential” row replicated from Table 5 to the subset populations. Adding this row to the subset tables would be an advantage to States as we monitor and lead performance from providers offering services in the areas of Family Literacy (Table 8), Integrated English Literacy and Civics Education (Table 9), Corrections Education (Table 10), and Integrated Education and Training (Table 11).

Distance Education. In 2023, OCTAE proposed to develop uniform distance education reporting criteria for Tables 4C and 5A. At the time, States expressed an appreciation for the retention of the distance education tables and the opportunity to help refine the guidance to make these tables more useful and consistent across States. NASDAE remains ready to serve as a convener for dedicated, synchronous stakeholder engagement around the issue of criteria and definition(s) of distance education, especially as changes to the modalities and vocabulary of instructional delivery continue to shift and expand post-pandemic.

In 2023, NASDAE commented on additional critical, related issues for NRS reporting that were not included in the ICR; these issues have become even more important to meeting the needs of learners, employers, policy directives, and addressing strained budgets and are presented again here.

Digital Literacy as a Key Measure of Skill Gain. With the Administration's focus on AI Literacy and the recognition that digital literacy is a foundational skill, prioritizing and incentivizing this instruction is even more imperative. Adult education providers are doing the important work of digital skill building with adults in their communities. Providers need a way to capture their efforts and students' growth in that area. Members urge the Department to accelerate its review of digital literacy assessments for reporting an educational functioning level (EFL) gain.

High School Equivalency (HSE) Sub-tests Cannot Be Purchased. With the appreciated change in 2024 to recognize an HSE sub-test for an EFL gain, we request the Department formally consider a reset of the "supplement not supplant" legacy guidance that restricts federal funds or state match funds to be used to purchase HSE subtests. The current situation is not consistent with other assessments used to demonstrate gain nor is it consistent with title partners that can purchase HSE sub-tests with federal dollars. This legacy is limiting States' full use of this new gain type.

Need for an Optional Workplace Adult Education and Literacy Table that Reports Gains. The need for this type of programming is growing with the increase in serving incumbent workers, the adoption of the effectiveness in serving employers indicator, and the ability of workplace adult education and literacy students to earn additional MSG types. This program model is an excellent fit to the Administration's priority on serving businesses to upskill workers but the lack of a reporting table hinders the consistent tracking of performance in this area for States and the federal office. This table could be of the same optional type as the Family Literacy Table 8. NASDAE members would like to be engaged in a conversation about adding such a table.

Additionally, there are emerging concerns that the NASDAE members would like to raise in stakeholder engagement with the OCTAE. They are included below.

1. State Directors have asked repeatedly for the MSG Table to be re-programmed to represent **all gains** in each gain type to give a true accounting of performance. Currently, these tables report a subset of the gains earned per type, artificially suppressing the performance reporting of States and, therefore, of the national program. Recently, OCTAE shared that Title II reported over 755,000 MSGs in PY2024-25; this number would be even higher if **all gains** were tallied.

2. The NRS and assessment publishers announced in 2024 that they were undertaking a study to determine if and how **incremental gains** could be recognized; when will this effort be restarted? We appreciate the effort to recognize the growth that students make within EFLs, especially those students in the mid-levels of Adult Basic Education levels and those at the beginning levels of English Language Acquisition.

3. NASDAE would like to convene State Directors with OCTAE in a conversation about better **representing actual performance of the program**, including reconsidering the denominator used in "overall MSG." The current "all participants" denominator artificially lowers performance by including all students with 12 hours before they have had a chance to demonstrate gains. The Title II MSG indicator should be more comparable to other title partners. Furthermore, the concept and benchmarks of "measurable skill gains" does not communicate well to the public and employers the growth that Title II students actually make while enrolled.

4. Additionally, the denominator of the **credential indicator** is problematic. In WIA, this indicator was calculated on "of the people who exited, how many completed the battery of tests?" The changes made in WIOA raises the bar significantly and artificially suppresses the program's communicated performance. Furthermore, Title II providers do not have the resources to conduct the case management and follow up that other title partners have to invest in documenting credentials awarded through third-party entities; OCTAE recently shared PY2024-25 data showing that Title II is a 78% part-time workforce, quite unlike the other titles.

5. State Directors of adult education are appreciative of the consideration of flexibility and innovation that TEGL 05-25 provides to State agencies administering WIOA Title I to modernize operations and program services. Twelve years post-authorization of WIOA, NASDAE recognizes that **States agencies administering WIOA Title II also need the flexibility of waivers** to address the current workforce development environment, advances in educational programming and occupational training, fairness in infrastructure cost agreements with local workforce development boards, and the Administration's efforts to return education to the States. Waivers could empower State agencies to conduct pilot projects to inform future policies and improve efficiencies and performance.