



Darrin A. King
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202-4537

May 23, 2011

Dear Mr. King,

We appreciate the opportunity to provide comments on the proposed revisions to the National Reporting System, as outlined in the March 22, 2011 Federal Register (FR Docket ID: 2011-6717) under “Measures and Methods for the National Reporting System for Adult Education.”

The Center for Law and Social Policy (CLASP) develops and advocates for policies at the federal, state and local levels that improve the lives of low-income people. As part of CLASP’s Center for Postsecondary and Economic Success, we specifically focus on policies that create pathways to postsecondary education and family-sustaining work for lower-skilled adults and out-of-school youth, including those in the adult education system. We therefore approach these proposed regulations through the lens of improving postsecondary outcomes for these populations.

We thank the Secretary of Education and the Office of the Vocational and Adult Education for proposing revisions to the National Reporting System that streamline data collection and take steps toward eliminating the barriers that programs face in supporting students’ postsecondary education goals. We agree with the Department’s assessment that the method of tracking only the attainment of student goals makes it difficult to interpret the state data and may provide a disincentive for programs to help students set ambitious, longer-term goals, such as entering postsecondary education. We support many of these proposed changes and, in these comments, offer ways to strengthen selected measures.

Proposed Changes to the Definition and Reporting of Entry into Postsecondary Education or Training Measure

We are pleased to see that the Department is taking steps to support the efforts of programs to orient their adult education services and programs to focus on postsecondary and career success. The proposed change to the definition and reporting of entry into postsecondary education or

training measure would revise the *Implementation Guidelines* for the National Reporting System by eliminating goal-setting for students for the measure “entry into postsecondary education or training” and replacing it with automatic cohort identification and tracking of a particular subset of students into postsecondary education. The proposed cohort for automatic tracking into postsecondary education is “learners who have earned a GED, have a secondary credential at entry, or who are enrolled in a class specifically designed for transitioning to community college.” Tracking this larger cohort of students and breaking the tie to individual goal-setting will incentivize states and local programs to develop seamless connections between adult and postsecondary education. This proposed revision also supports President Obama’s goal to increase the number of postsecondary degrees in the U.S. and acknowledges the need to focus on the inclusion of adults, not just students in the K-12 system, in meeting these goals.

However, we feel this measure could be strengthened by capturing transitions into the full array of postsecondary programs in which adults enroll, such as occupational and workforce training programs, apprenticeship programs, and both certificate and two-year degree programs at community colleges. We suggest modifying the “applicable population” language so that it explicitly includes students in programs designed to transition or seamlessly connect students to postsecondary education and training in a *variety* of delivery systems, not just community colleges. We understand that a large number of adult education students who enter postsecondary education may seek entry into their local community college, but recognize that occupationally-focused sub-baccalaureate programs and apprenticeship programs delivered by other entities, such as community-based organizations and unions, can also provide a strong path for students to family-sustaining wages and career advancement. We also suggest expanding the definition of “postsecondary education” for the purpose of tracking student “entry into postsecondary education” to be inclusive of public, nonprofit private, and for-profit private two- and four-year institutions as well as occupational skill training and apprenticeship programs.

Further Improvements to Incent Postsecondary Preparedness and Success

Over the long run, we encourage the Department to measure not only transitions into postsecondary education but also the eventual success of those students in postsecondary persistence and completion. We understand the challenges that tracking progress and completion might pose for local adult education programs with limited resources, but we believe that measuring success would further bridge the gap between adult education services and postsecondary occupational and educational degree and certificate programs. Adding measures of postsecondary success, such as successfully completing the equivalent of one semester of occupational training or college-level math or English, or earning a credential of demonstrated value in the labor market (as defined by the Department of Labor’s Training and Employment Guidance Letter 15-10), would give states and local providers further incentive to develop programs that seamlessly connect with postsecondary education programs and their data systems.

The addition of such measures is consistent with the legislative definition of one of the core adult education performance measures, which requires “placement in, retention in, or completion of, postsecondary education, training, unsubsidized employment or career advancement.” States could work with their local providers to find ways to obtain data on these measures, such as through data matches between the adult education system and the state higher education system or through local agreements to match adult education student data with data in the National Student Clearinghouse.

We thank the Department of Education for proposing reforms to the National Reporting System that help programs better support the longer-term, ambitious postsecondary goals of many students in the adult education system and respectfully submit these comments for further consideration.

Sincerely,

The Center for Law and Social Policy