July 25, 2011

Office of Information Regulatory Affairs  
Attn: Education Desk Officer  
Office of Management and Budget  
725 17th St., NW, Room 10222  
New Executive Office Building  
Washington, DC  20503

Via email: oira_submission@omb.eop.gov

Re: Comments on the proposed revision of National Reporting System for Adult Education

I am pleased to respond to the notice in the June 24, 2011 Federal Register asking for comments on the Department of Education Office of Vocational and Adult Education (OVAE) request for OMB approval of revisions to the National Reporting System (NRS) for Adult Education.

As a research professor at the George Washington Institute of Public Policy, I focus on federal policies and programs that support the nation’s economic competitiveness. From this perspective, I believe that the programs authorized by the Adult Education and Family Literacy Act (AEFLA) can play a valuable role in seeing that a greater proportion of U.S. adults have the basic skills necessary to participate in a globally competitive workforce. Further, I believe that the proposed revisions to the NRS will lead to more meaningful assessments of the performance of state programs funded under AEFLA.

That said, after looking over the revised NRS Reporting Tables, I believe that tables 5, 5A, 8, 9, 10, and 13 could be further improved with the addition of information on participant earnings before and after adult education, e.g., data on mean, median, and distribution of earnings. Such information need not be part of goal attainment assessment, at least initially. Each state program could obtain participant job wage information from the state’s labor market information (LMI) agency, which has access to individual employee wage records.

I recognize that consideration of the addition of participant wage information is outside the purpose of this particular proposed revision of NRS. Still, I suggest that OMB, as part of the clearance process, ask OVAE to carry out a study to ascertain the desirability and feasibility of adding participant wage data to report tables.

I hope you find my comments of value and thank you for the opportunity to provide them.
Sincerely,

Andrew Reamer, Research Professor