



## MEMORANDUM

**To:** U.S. Department of Education  
**From:** Alliance for Excellent Education, Center for American Progress, Center for Assessment, Jobs for the Future, Learning Policy Institute, Linked Learning Alliance, NAF  
**Date:** December 20, 2018  
**Re:** Recommendations for the Carl D. Perkins Career and Technical Education Act State Plan

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The undersigned organizations appreciate the opportunity to provide recommendations to the U.S. Department of Education (the Department) on the Carl D. Perkins Career and Technical Education Act draft State Plan Guide. The economic success of the country depends on having a qualified, skilled, and diverse workforce. To meet this demand, it is incumbent upon the nation to ensure that all students have access to high-quality career and technical education (CTE) that prepares them for the jobs that exist in the twenty-first century. As the Department seeks feedback on the Perkins state plan template, the undersigned organizations respectfully request your consideration of several recommendations aimed at improving career and technical education (CTE) programs for historically underserved students, ensuring successful implementation of the law.

Note: Regarding the redline language recommended in this memo, plain text refers to language included in the Department's draft State Plan Guide. **Red text** refers to language our organizations ask the Department to include in the Guide. *Italicized text* refers to statutory language from the Carl D. Perkins Career and Technical Education Act.

**Recommendation One: Require each eligible agency to describe how the state's overarching vision for education and student learning aligns with the goals and priorities identified within the state's Every Student Succeeds Act (ESSA) plan.**

Perkins V requires the state plan to include a strategy for any joint planning and alignment of other federal programs to achieve the State's strategic vision and goals for preparing a skilled and educated workforce. The state plan template should ask states to describe a shared vision for the state's approach, under Perkins and ESSA, for education and a clear theory of action as to how desired outcomes (i.e., the skills and competencies necessary for success) are most likely to be obtained.

Suggested redline language to include under item "B. Program Administration and Implementation".

Item (B)(1)(b)

Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V). **Describe how this vision aligns with the goals and priorities for education and student learning defined within the State's ESSA plan.**

Statutory reference:

Sec. 122(d)

*(3) a strategy for any joint planning, alignment, coordination, and leveraging of funds*

*(A) between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in paragraph (2), including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and*

*(B) for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and Higher Education Act of 1965;*

**Recommendation Two: Require eligible agencies to specifically describe how they will take into account the performance of historically underserved subgroups when developing State Determined Levels of Performance for Core Indicators of Performance.**

Perkins V requires states and school districts to continually make meaningful progress toward improving the performance of all career and technical education students, including racial/ethnic subgroups as identified in the law (see statutory references below). Recent performance data indicate that historically underserved racial/ethnic groups (e.g. African American and Latinx students) are in many cases, significantly underperforming compared to their White and Asian peers on the core indicators of performance.<sup>1</sup> In the State plan, eligible agencies should be asked to describe specific strategies they will use to intentionally improve the performance of these student groups.

Suggested redline language to include under item "D. Accountability for Results".

Item (D)(6)

**Describe how the eligible agency will continually make meaningful progress toward improving the performance of all the subgroups described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 113(b)(2)(A)(i)(III)(bb) as described in text box 4.**

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<sup>1</sup> U.S. Department of Education, Office of Career, Technical, and Adult Education, Consolidated Annual Report (CAR). Reporting year, 2017. Retrieved from: <https://perkins.ed.gov/pims/DataExplorer/Performance>

Statutory References:

Sec. 113(b)(2)(A)(i)(III)(bb):

*“require the State to continually make meaningful progress toward improving the performance of all career and technical education students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48); and”*

Sec. 113b(4)(A)(i)(II):

*“require the eligible recipient to continually make meaningful progress toward improving the performance of all CTE concentrators, including subgroups of students described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965 and special populations, as described in section 3(48);”*

**Recommendation Three: Encourage states to support the creation and sustainability of promising and evidence-based college and career pathways initiatives at the local level through the use of reserve funds.**

Perkins V increases the amount states may reserve for innovation at the local level from 10% to 15% to identify and promote promising and proven CTE programs and practices that serve specific groups of CTE students. This set-aside presents an important opportunity for states to prioritize equity and quality. Over the past several years CTE has evolved in many places to better reflect the needs of employers and postsecondary institutions by improving secondary instruction through integrated rigorous academics and CTE coursework, work-based learning, and integrated student support—including social and emotional support. Additionally, school districts are partnering with local and regional employers and colleges to align programs of study and funding streams to intentionally prepare students for high-skill, high-wage jobs that meet the needs of the local economy.

The Department’s state plan template can encourage innovative college and career pathways systems, programs, and practices by requiring states to describe how they will use their reserve funds to promote high-quality CTE and make these opportunities available for all students.

Suggested redline language to include under item “B. Program Administration and Implementation”.

Item (B)(1)(e)

If the eligible agency intends to use reserve funds, describe how it will use reserve funds to foster access and innovation through the identification and promotion of promising and proven career and technical education programs, practices, and strategies that prepare individuals for nontraditional fields. (Section 112(c)(2)(A) of Perkins V)

Statutory Reference:

Sec. 112:

*(c) Reserve.—From amounts made available under subsection (a)(1) to carry out this subsection, an eligible agency may award grants to eligible recipients for career and technical education activities described in section 135—*

*(1) in—*

*(A) rural areas;*

*(B) areas with high percentages of CTE concentrators or CTE participants;*

*(C) areas with high numbers of CTE concentrators or CTE participants; and (D) areas with disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II); and*

*(2) in order to—*

*(A) foster innovation through the identification and promotion of promising and proven career and technical education programs, practices, and strategies, which may include programs, practices, and strategies that prepare individuals for nontraditional fields; or*

*(B) promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, high-wage, or in-demand occupations or industries.*

**Recommendation Four: Require each eligible agency to describe any changes made to their state determined levels of performance in the state plan as result of stakeholder feedback.**

Perkins V requires each eligible agency to develop levels of performance in consultation with stakeholders, and to provide the opportunity for stakeholders to provide written comments describing how the levels of performance: (1) meet the requirements of the law, (2) support improving the performance of CTE concentrators, and (3) support the needs of the local education and business community.

The state plan template should encourage states to describe changes made to their state plan in response to stakeholder feedback to clearly illustrate the degree to which stakeholder input was included in the state plan.

Suggested redline language to include under item “D. Accountability for Results”.

Item (D)(3)

Provide a written response to the comments provided during the public comment period described in section 113(b)(3)(B) of the Act, **and describe changes made to the State plan in response to stakeholder feedback.** (Section 113(b)(3)(B)(iii) of Perkins V)

Item (D)(4)

Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of the Act, which at a minimum shall include—

- a. a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance under that section as provided in the text box on the following page;
- b. an explanation for the State determined levels of performance and **how the final performance levels took stakeholder feedback into consideration**; and
- c. a description of how the state determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V); and
- d. As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

Statutory Reference:

Sec. 113(b)(2)(B)(ii):

*“Written comments.—Not less than 60 days prior to submission of the State plan, the eligible agency shall provide such stakeholders with the opportunity to provide written comments to the eligible agency, which shall be included in the State plan, regarding how the levels of performance described under subparagraph (A)—*

*(I) meet the requirements of the law;*

*(II) support the improvement of performance of all CTE concentrators, including subgroups of students, as described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48); and*

*(III) support the needs of the local education and business community.”*

Sec. 113(b)(2)(B)(iii):

*(iii) Eligible agency response.—Each eligible agency shall provide, in the State plan, a written response to the comments provided by stakeholders under clause (ii).*