

NCWGE NATIONAL COALITION FOR WOMEN AND GIRLS IN EDUCATION

November 30, 2006

Office of Vocational Education
Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Comment on Carl D. Perkins Career and Technical Education Improvement Act of 2006 (Pub. L. 109-270) State Plan Guide.

On behalf of the National Coalition for Women and Girls in Education (NCWGE), thank you for your invitation to comment on the collection activity requirements proposed in the Carl D. Perkins Career and Technical Education Improvement Act of 2006 State Plan Guide (hereinafter the proposed State Plan Guide).

NCWGE is a diverse coalition of over 50 organizations dedicated to improving opportunities for women and girls in education, including career and technical education. The following recommendations reflect our strong conviction that 21st century career and technical education programs must prepare women and girls – including single mothers, displaced homemakers and welfare recipients – for high skill, high wage and non-traditional careers that lead to economic self-sufficiency.

I. Timeline for Submission of State Plans (pg. 4)

Although the Department does not plan to issue the final State Plan Guide until the end of January, 2007, the proposed State Plan Guide requires States to submit their new State plans to the Department by April 16, 2006. We strongly urge you to reconsider this deadline for States submitting six-year plans. It is unrealistic to assume that a State can develop a high-quality six-year plan in only four months. Indeed, we question whether States who attempt to complete a six-year plan in this time frame will adequately seek and respond to input from students, representatives of special populations, and other key stakeholders.

Students preparing for non-traditional employment, single parents, displaced homemakers and other special populations have unique needs that are not always well understood by state career and technical education program staff. We encourage the Department to develop a realistic timeline for the submission of state plans that allows states adequate time to consult with students, service providers, experts on non-traditional training and other representatives of special populations. This is critical to ensuring that state plans are designed to promote the success of special populations, including individuals training for non-traditional occupations, in career and technical education.

II. Provision of Services for Special Populations (pg. 17)

We are pleased that the procedural suggestions for the provision of services for special populations encourages states to seek complete information on local plan applications regarding

proposed programs, services, and activities for special populations. We encourage you to expand this recommendation by requiring local plan applications to include proposed expenditures for these programs, services and activities.

In recent years, services to displaced homemakers, single parents and students training for non-traditional employment have substantially decreased. Perkins IV attempts to reverse this trend and increases the availability of career and technical education programs that address the unique needs of these populations, by requiring eligible recipients to spend funds on activities that prepare special populations – including displaced homemakers and single parents – for jobs that lead to self-sufficiency. However, in order for this new provision to be effective, local institutions and consortia must make meaningful expenditures on activities for individuals training for non-traditional employment, single parents, displaced homemakers and other special populations.

States should also be encouraged to include a copy of local applications in their state plan to demonstrate that they are seeking relevant information from eligible recipients on the proposed programs, services and activities for special populations.

III. Accountability and Evaluation (pg. 19)

We commend the Department for retaining separate participation and completion indicators for the non-traditional core indicator. It is important to understand the extent to which sufficient numbers of students are being recruited to programs that are non-traditional for their gender, as well as whether students in non-traditional training programs persist in and complete these programs. Two separate indicators are necessary to determine whether critical interventions – such as professional development, mentoring, parental involvement, and peer support programs – occur between recruitment and completion to promote persistence in non-traditional training programs.

IV. Baseline Data (pg. 41)

The proposed State Plan Guide requires states to use data for the most recently completed program year to set baselines for each of the core indicators of performance. Perkins III required States to collect data on many of the same core indicators in Perkins IV, leaving States with historical data. States that are capable of conducting multi-year analysis of their data therefore should be encouraged to set baselines using multiple year averages rather than setting their baseline on a single year's performance. For those measures where a longer view of performance trends can be determined, this historical perspective will help States set realistic benchmarks to gauge future performance.

V. Final Agreed Upon Performance Levels Form (FAUPL) (pg. 45)

During the Perkins reauthorization process, Congress criticized the career and technical education community for its inability to use the Perkins accountability system to paint a consistent picture of career and technical education programs throughout the country. Although Perkins IV requires the Secretary to report “State-by-State comparisons” (see Sec. 113(c)(5)(B) of data, there currently is no standard definition for CTE participants, concentrators and

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completers and no common measure definition for the core indicators. The U.S. Dept. of Education, Office of Vocational and Adult Education, over that past five years has been working closely with states to develop a quality data reporting system and most recently has worked to build consensus on standardization of definitions, including measure definitions, at the secondary and postsecondary level through a series of Data Quality Institutes (“DQI”). The results of the DQI should be used in the FAUPL to standardize the data being collected across the country to allow for the State-by-State comparisons required in Perkins IV.

To resolve a similar concern, NCWGE recommends that OVAE include suggested definitions for special populations not currently defined in Perkins IV. Although Perkins IV references NCLB, the terms “single parent” and “economically disadvantaged student” are neither defined in NCLB nor in Perkins IV, and could benefit from clarification through the State Plan Guide.

NCWGE also recommends that a national crosswalk of non-traditional occupations and classification of instructional programs be included in the State Plan Guide, and that States use this list to determine their baseline measurement for the non-traditional indicator. This list should also be used throughout the life of Perkins IV to maintain a consistent set of non-traditional programs measured in the non-traditional indicator. (See attached)

Again, thank you for this opportunity to provide comments on the Carl D. Perkins Career and Technical Education Improvement Act of 2006 State Plan Guide. The National Coalition for Women and Girls looks forward to working with the U.S. Department of Education, Office of Vocational and Adult Education on the implementation of Perkins IV.

Sincerely,



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