



January 7, 2019

Director of the Information Collection Clearance Division  
U.S. Department of Education  
550 12<sup>th</sup> Street SW, PCP, Room 9088  
Washington, DC 20202-0023

RE: Carl D. Perkins Career and Technical Education Act – Guide for the Submission of Consolidated Annual Reports –Comment Request (Docket ID number ED-2018-ICCD-0121)

Thank you for the opportunity to comment on the Information Collection Request (ICR) on the Guide for Submission of Consolidated Annual Reports (CAR) related to the Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V).

The National Alliance for Partnerships in Equity (NAPE) is a consortium of state and local agencies, corporations, and national organizations. NAPE members are primarily state and local career and technical education (CTE) administrators, teachers and counselors working to increase access and success of underrepresented students by gender, race and ethnicity, and each of the expanded special population subcategories in Perkins V in CTE and STEM programs of study. Through its four lines of business—professional development, technical assistance, research and evaluation, and advocacy—NAPE strives to achieve its mission of building educators' capacity to implement effective solutions for increasing student access, educational equity, and workforce diversity.

NAPE recognizes the Department for its significant effort in developing a Guide for the Submission of Consolidated Annual Reports that attempts to be reasonable in its burden and thorough. The CAR provides an opportunity for the Department to collect important qualitative (narrative) and quantitative (accountability data) information that can be used by the field for program improvement efforts and to determine the effectiveness of CTE across the nation. After reviewing the Guide for the Submission of Consolidated Annual Reports, NAPE has identified some technical issues with the guidance as well as suggested changes that will improve the substance of the CAR in line with the intent of the legislation. The page numbers referenced are from the PDF file of the guide that was included in the Docket online.

## **II. Narrative Performance Report**

Page 10 - Item II.B.1.b. and II.B.1.c.ii are duplicative and ask for the same information – describe the major accomplishments as a result of using State leadership funds to support individuals in State institutions, such as State correctional institutions, including juvenile justice facilities, and educational institutions that serve individuals with disabilities. One of these should be removed.

Page 10 - Item II.B.1.c.i. needs to be separated into three sub-questions: one that addresses the major accomplishments as a result of using State leadership funds for CTE preparation for non-traditional fields in current and emerging professions; one that addresses the major accomplishments as a result of using State leadership funds for programs for special populations; and one that addresses the major accomplishments as a result of using State leadership funds for activities that expose students to high-skill, high-wage, and in-demand occupations. Having these three items separated into three sub-questions will provide a way to identify the accomplishments that states have made as a result of their use of the State Leadership set-aside for non-traditional career preparation, a particular priority in Perkins V as a result of the performance measure and the State Leadership set-aside. Having all three of these items embedded in a single question will result in an answer that does not provide the specificity that would address this significant investment. Just like Items II.B.1.b and II.B.1.c.ii which ask about how funds were used to support individuals in State institutions, for which there is a State Leadership set-aside, the activities of the state supported by the non-traditional set-aside should also be described in the CAR.

Page 10 - Item II.B.1.b. (at the bottom of page 10) should be labeled d. not b.

Page 11 - Item II.B.1.c.i. should be II. B.1.e.i.. This item should be two questions: 1) achieving the goals described in section 122(d)(2) of Perkins V, and 2) achieving the State-determined levels of performance described in section 113(b)(2)(3)(A) of Perkins V. Combining these two items into a single question does not give adequate attention to the importance of the state's need to address its own vision and goals for CTE separately from the state's effectiveness in using State leadership funds to achieve the State-determined levels of performance. The second question should elicit a response that describes how the state used State leadership funds to effectively drive program quality and improvement that addresses the goals of the performance measures set by Congress.

Page 11 - Item II.B.3.a. is a critical and important question that will be a new analysis for many states under Perkins V. NAPE encourages the Department to consider including a data chart that would be completed as part of the CAR that highlights the gaps discovered in the performance measures. Creating a consistent method for states to report the disparities or gaps in performance will create a tool that can be used for technical assistance with states and will provide more valuable information for researchers and others interested in this issue in Perkins V. NAPE suggests that the tool utilize data reported in the Performance Data Forms for those subgroups who are below the performance of all students (row 1) and summarizes it for an easy review. This tool could be similar to the Performance Data Forms and would include the following elements: Year of reporting; performance measure designation; subgroup name; total student level of performance; subgroup level of performance; gap (difference between total student level of performance and subgroup level of performance); progress (difference between subgroup level of performance from the previous year). This form could be cumulative from year to year to show the progress each subgroup has made in improving its performance. A tool of this kind will help states with determining what is critical to report under this section and will be of particular value to states who will need to address these gaps as part of a State Program Improvement Plan.

## Financial Status Reports

Page 14/15, Row D asks for the same information as Row E. We think that Row D can be eliminated.

Page 15, in Row G, the wording is unclear. We believe it should state that the amount, when “added to any reserve funds under Row C,” shall not be less than 85 percent of the state’s total allocation.

Page 15, in Row H, the reference to formula distribution funds should reference Row G, not Row F.

Page 15, under section b., in Row K, the amount for special populations recruitment does not have to “equal” any specified amount. Instead, the law states that it must “be not less than” that amount.

Page 15, Row L, the last sentence is not applicable to “other leadership activities” and appears to have been included in error.

Page 15, Row M, the total here should be not more than 10 percent of the overall allocation, not 15 percent.

## Performance Data Reports

Page 18 - Reporting Data for Districts and Institutions that Do Not Accept Perkins Funds: Item IV.A.1.a.ii. suggests that data must be reported on all students participating in publically funded CTE in the state, regardless of whether institutions receive Perkins funds. We agree that all CTE students in a school district or postsecondary institution that receives funds should be reported each year, regardless of whether the specific CTE program those students are in received direct funding. However, there is nothing in the law that can compel school districts or postsecondary institutions who do not accept Perkins funding to submit the required performance data, and in fact, smaller school districts may decide not to participate in Perkins specifically to avoid this required reporting.

Page 19 - Item IV.A1.b.i. and IV.1.b.ii., unduplicated counts of students overall and by gender/Career Cluster are required. However, there is no guidance provided related to students who participate in more than one Career Cluster. We would suggest requiring an unduplicated count overall, but allowing the Career Cluster level count to be duplicated (i.e., for students to be counted in as many Career Clusters as applicable to obtain a truer picture of the participation of students across Career Clusters).

Page 20 – Item IV.A.1.c.ii., the same unduplicated counts are required of concentrators. Like above, we would suggest requiring unduplicated overall counts, but allowing individual Career Cluster data to be duplicated.

Page 26 – Table 3 - Name of Non-traditional Indicators: Measures 4S1 (page 25) and 3P1 (page 26) are currently labeled “Non-traditional Program Enrollment.” However, this label is confusing since the indicators are measuring the number of concentrators, not merely the

number of students enrolled in the programs. We suggest changing the name of this measure to “Non-traditional Program Concentration.”

Page 32 – Table 4 - Youth who are in or have aged out of the Foster Care System: The term youth needs to be defined for the purposes of reporting this subgroup. We suggest that youth be defined in the CAR report instructions the same as in WIOA for the purposes of reporting this subgroup – individuals aged 14-24. Youth who age out of the Foster Care System at 18 should still be included in this data set through age 24 in order to be consistent with WIOA and Foster Care System reporting.

Page 33 – Table 4 - Youth with a Parent in Active Duty Military: The term youth needs to be defined clearly for reporting purposes at the post-secondary level. In WIOA, youth is defined as individuals aged 14-24. We suggest that youth be defined in the CAR report instructions the same as in WIOA for the purposes of reporting this subgroup at the postsecondary level.

Pages 35 and 36 – IV.B.1. CTE Participant Enrollment Form and IV.B.2. CTE Concentrator Enrollment Form – NAPE has found similar data reported on the CAR under Perkins IV to be extremely valuable when providing professional development and technical assistance to states to improve program quality and for program improvement purposes, especially due to the cross-tabulation of gender with the 16 career clusters. Over the past 12 years we have been frequently asked if these same data are available at the national level for every state disaggregated by race and special population subgroup. Unfortunately our response has always had to be “no”. NAPE strongly encourages the Department to consider asking states under Perkins V to report these same data also disaggregated by race and special population subgroup. Because states are now required to report data disaggregated by program or career cluster it is highly likely that many states will be able to complete this request with minimal effort. These data would also be extremely helpful for states as part of their gap analysis whereby they can compare and benchmark enrollment and concentrations trends across states.

Page 37 IV.B.3. CTE Concentrator Performance Forms – Core Indicator 1S1 – the row for the 16<sup>th</sup> Career Cluster - Transportation, Distribution and Logistics - is missing.

Pages 37-55 IV.B.3 CTE Concentrator Performance Forms - Out-of-Workforce Individuals: The category of out-of-workforce individuals, by definition, should not be required reporting at the secondary level. This category does not apply to minors or high school students, so should be removed from the reporting form for secondary indicators.

Pages 37-61 IV.B.3. CTE Concentrator Performance Forms - line 23 is listed twice, and the second mention should be line 24.

Pages 44 and 60 IV.B.3. CTE Concentrator Performance Forms - Core Indicator 4s1 and 3p1- Since the passage of Perkins III in 1998 and the inclusion of the nontraditional measure in the accountability system, there has been significant confusion about what the CAR reports for the nontraditional measure under the disaggregated categories of gender. If interpreted, without any definitions, as the form indicates, the actual level of performance for males is the number of males in programs nontraditional for their gender divided by all males in nontraditional CTE programs (programs that are nontraditional for males and females). This actual level of performance is not a comparable measure to the one reported as the grand total, as the

denominator for the nontraditional measure is a function of the designation of the gender for which the program is nontraditional not the gender of the student. This has created significant problems when states have interpreted the gender disaggregated data as an indicator of how well they are doing with getting females into programs nontraditional for females and the same for males. To correct this problem NAPE suggests that three additional rows be added to the CTE Concentrator Performance Forms for 4s1 and 3p1 below row 20 with the following titles: Nontraditional Program Performance (title row); Programs Nontraditional for Females; Programs Nontraditional for Males. These data would provide accurate comparisons to the Grand Total data showing how well a state was doing at enrolling concentrators in programs nontraditional for females and in programs nontraditional for males. These data are currently not reported on IV.B: Performance Data Forms for 4s1 and 3p1. The inclusion of these two additional data elements would eliminate the significant confusion around the gender disaggregation of the nontraditional measure.

Pages 43 and 56 IV.B.3. CTE Concentrator Performance Forms - Core Indicator 3s1 and 1p1- Placement in Further Education- The disaggregation is not structured correctly, and is missing a general category for placement in further education. Since the statute only requires that level of education placement be reported if it is available, significant data could be lost by not allowing data to be submitted on placement in education generally (before breaking it down by specific certificate or degree level). To correct this, the part of the form between line 20 and 21 should be given a line number and allow for data to be reported. This would align with statute, which first requires the disaggregation of placement into further education, advanced training, military or service programs, or employment (4 separate categories). Then, the education category can be further broken down into the requisite levels.

This concludes our specific input.

Perkins V provides a critical opportunity for states and local education agencies to identify and address equity gaps in high quality programs leading to high-skill, high-wage, and in-demand careers, especially for students from the subgroup populations identified in Perkins V. It is important for the Department to provide a comprehensive reporting structure that will help the states evaluate their progress and be clear about where they have been effective in improving the quality of CTE. The CAR provides the opportunity to lead states through the process of identifying equity gaps in performance and to report on how they have been able to be successful in addressing the diverse needs of students, especially those from special populations. NAPE uses the CAR reports for research, professional development and technical assistance with states, and we value the information that these reports provide. We hope you find the suggestions that we have made helpful in building on the good work that you have done. Thank you for the opportunity to provide these comments. We look forward to working with the Department and supporting the states in this important work.

Sincerely,



Ben Williams, PhD, Chief Executive Officer