

## Equity Gap Analysis - Local

Contained within is an overview of key points relative to the provisions and requirements for locals to conduct an equity gap analysis to assist in meeting the provisions in Perkins V. These provisions include: the local levels of performance (LLP); disaggregation of data; the local report; local improvement plans; the local application; the comprehensive local needs assessment (CLNA); and the local uses of funds.



### ACCOUNTABILITY (Sec. 113)

- LLP must be set for each of the core indicators at the secondary and postsecondary level.

#### Concentrator:

All performance measures use CTE concentrators as the population included in the measure

- At the secondary level, a student who has completed at least two courses in a single CTE program or program of study
- At the postsecondary level, a student enrolled in a CTE program who has earned at least 12 credit hours or completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

#### Secondary Core Indicators (5)

1. The percentage of CTE concentrators who graduate high school (based on the ESSA four-year rate with an option to use the extended-year rate if a states chooses)
2. CTE concentrator proficiency in the State academic standards (academic proficiency)
3. “The percentage of CTE concentrators who, in the second quarter after exiting from secondary education” (redline, p.25), are in postsecondary education or advanced training, military service, a service program, the Peace Corps or are employed
4. A measure of “CTE program quality” (state picks at least one of the following): The percentage of CTE concentrators graduating high school having
  - a. Attained a recognized postsecondary credential
  - b. Attained of postsecondary credits in their CTE program/program of study
  - c. Participated in work-based learning
5. The percentage of CTE concentrators in CTE programs that lead to nontraditional fields.

#### Postsecondary Core Indicators (3)

The percentage of CTE concentrators

1. Who during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or community service program (under Title 1 of the National and Community Service Act of 1990).
2. Who receive a recognized postsecondary credential during participation in or within 1 year of program completion.
3. In CTE programs that lead to nontraditional fields

- Five requirements for Local Levels of Performance (LLP) include -
  - Be expressed in percentage or numerical form consistent with the State
  - Local to continually make meaningful progress towards improving the performance of all CTE students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of the ESEA of 1965 (by gender, race and ethnicity, and migrant status), and special populations (see “Data Disaggregation” below)
  - Prior to the third program year, locals may adjust their LLP as part of the local application but the LLP must be higher than the average actual performance of the two most recently completed program years
  - When adjusting LLP compare with other local education agencies (LEA) considering the characteristics of CTE concentrators and the services or instruction to be provided. These characteristics could include the support services needed by special populations.
  - Set the LLP using valid and reliable data
- The LLP shall be submitted in the local application for each of the program years covered by the local plan

### **DATA DISAGGREGATION (Sec. 113)**

- Data disaggregation required for race, ethnicity, gender, economically disadvantaged, youth who are in or have aged out of the foster care system, students with disabilities, English learners, migrant students, homeless students, students with a parent in the active military, single parents, out-of-work individuals, and students pursuing nontraditional careers.

### **LOCAL REPORT (Sec. 113)**

- Local report includes -
  - The actual<sup>1</sup> levels of performance for all CTE concentrators; for each of the disaggregated subgroups; and by CTE program or career cluster if not practical.
  - Identifying and quantifying any disparities or gaps in performance on the local levels of performance between any subgroup and the performance of all CTE concentrators

### **LOCAL IMPROVEMENT PLANS (Sec. 123)**

- If a Local Education Agency (LEA) fails to meet at least 90 percent of an agreed upon local level of performance for any of the core indicators of performance for all CTE concentrators a program improvement plan will have to be submitted
- Requires states and locals to include an analysis of the performance disparities or gaps based on data disaggregation and actions that will be taken to address such gaps.
- If after three years the LEA still is not meeting 90 percent of its target, then sanctions may be used.
- A waiver of sanctions can be given if there are exceptional or uncontrollable circumstances, such as a natural disaster or an unforeseen decline in the financial resources of the eligible recipient

### **LOCAL APPLICATION (Sec. 134)**

The State shall determine the requirements for the local application except that the local application must include -

- a description of the results of the Comprehensive Local Needs Assessment (CLNA) and how special populations will learn about CTE course offerings and whether each course is part of a CTE program of study

<sup>1</sup> Language used in the legislation.

- A description of how the eligible recipient will address disparities or gaps in performance in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions to be taken to eliminate those disparities or gaps
- a CLNA every two years, that shall include
  - an evaluation of the performance of the students served by the eligible recipient with respect to State and local adjusted levels of performance established pursuant to section 113, including:
    - an evaluation of strategies needed to overcome barriers that result in lowering rates of access to, or performance gaps in, the courses and programs for special populations
    - providing programs that are designed to enable special populations to meet the local levels of performance
    - providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.
  - consultation with representatives of: CTE programs at the secondary and postsecondary levels; state board or local workforce development board and a range of local business and industries; special populations; local agencies serving out-of-school youth, homeless children and youth, and at-risk youth; and Indian Tribes and Tribal organizations

#### LOCAL USES OF FUNDS (Sec. 135)

- This section's general authority statement requires locals to use funds to develop, coordinate, implement, or improve CTE programs to meet the needs identified in the CLNA.
- 6 Required uses of funds, 5 include activities related to equity -
  - Career exploration and career development for students, including middle school students, which may include
    - Introductory courses or activities focused on career exploration and career awareness, including nontraditional fields to students including in the middle grades
    - Any other activity that advances knowledge or career opportunities and assists students in making informed decisions about future education and employment goals, including nontraditional fields
  - Provide professional development for teachers, principals, school leaders, administrators, and career and school counselors, or paraprofessionals, which may include -
    - supporting the implementation of strategies to improve student achievement and close gaps in student participation and performance in career and technical education programs
    - opportunities to advance knowledge, skills and understanding in pedagogical practices
    - provide appropriate accommodations for individuals with disabilities
    - frameworks to effectively teach students, including a particular focus on students with disabilities and English learners, which may include universal design for learning, multi-tier systems of supports and positive behavioral interventions and support
  - Provide within CTE the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations.
  - Plan and carry out elements that support the implementation of programs of study and student achievement of the local adjusted levels of performance established under section 113, which may include—

- initiatives that provide students with transition-related services, including the Individuals with Disabilities Education Act;
  - supporting programs and activities that increase access, student engagement, and success in science, technology, engineering, and mathematics fields (including computer science) for students who are members of groups underrepresented in such subject fields;
  - providing CTE, in a school or other educational setting for adults or out-of-school youth to complete secondary school education or upgrade technical skills; and
  - support to reduce or eliminate out-of-pocket expenses for special populations participating in CTE, including those participating in dual or concurrent enrollment programs or early college high school programs, and supporting the costs associated with fees, transportation, child care, or mobility challenges for those special populations.
- Develop and implement evaluations of the activities carried out with funds under this part, including evaluations necessary to complete the CLNA and the local report

### How to Conduct an Equity Gap Analysis

✓ **Collect data** for every CTE program and career cluster, disaggregated by each of the data elements below.

Data Element	Data Source
Race/Ethnicity – American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, White.	Local administrative data – self-reported
Gender – Male, Female, Other	Local administrative data – self-reported
Economically Disadvantaged, including low-income youth and adults	Secondary – Free and Reduced Lunch eligibility Post-Secondary – PELL grant eligibility
Youth who are in or have aged out of the foster care system	Department of Health and Human Services Child Welfare
Students with disabilities	Secondary – Students with IEPs and 504 plans Post-Secondary – Local registration data
English learners	Local administrative data – home language survey, enrollment in bilingual or ELL program
Migrant students	Local administrative data – enrollment in migrant ed
Homeless students	Local administrative data – self or staff reported
Students with a parent in the active military	U.S. Armed Services
Single parents, single pregnant women	Local administrative data – self-reported
Out-of-work individuals	Local administrative data – Department of Labor Unemployment Insurance or self-reported
Students pursuing nontraditional careers	Identify nontraditional programs by gender, identify students in programs nontraditional for their gender

- ✓ **Create data visualization tools** using tables and graphs that compare each of the special population subgroups to its appropriate comparison group disaggregated by program, or career cluster if program data are not available. The identification of the appropriate comparison is critical to ensure the accurate identification of gaps. Here are two examples:
- When looking at a participation gap analysis for the nontraditional measure, the numerator is *all students in programs nontraditional for their gender* while the denominator is *all students in*

*nontraditional programs*. When these data are disaggregated by gender the appropriate numerator is *females in programs nontraditional for their gender* and the denominator is *all students in programs nontraditional for females* (not all females in nontraditional programs).

- When looking at a participation gap analysis for graduation, the numerator is *CTE concentrators who graduated in the program year* and the denominator is *CTE concentrators who left secondary education in the current year*. When the data are disaggregated by race, for example, the numerator is *African American concentrators who graduated in the program year* and the denominator is *all African American concentrators who left secondary education in the program year*.
  - NAPE provides statewide data dashboards at the cluster level disaggregated by gender for each of the years since Perkins IV was administered. The visualization also includes cluster distribution within gender, which can provide important insight into the clusters where each gender is most concentrated within the state. Visit [www.napequity.org/perkinsv](http://www.napequity.org/perkinsv) for these tools and more.
- ✓ **Identify those subgroups that show a gap from their comparison group.** This gap analysis should be done at the smallest possible disaggregated data point to be the most effective. This means looking at subgroup participation and performance at the program level. If you have access to course level data, these data may be even more informative. You may also want to make multiple demographic comparisons in addition to looking at a subgroups performance compared to all concentrators' performance in CTE. Looking at cross-demographic performance (i.e. comparing all racial groups, males and females, or each of the special population groups) may also show you similarities and differences across each of the demographic group. Understanding the gaps at the lowest disaggregated data analysis level and complete comparisons will make the identification of the root causes and potential strategies for closing the gaps more effective, and help in focusing interventions where they should be implemented.
- When looking at participation rates the standard civil rights monitoring gap that is a flag for potential access discrimination is a 10% participation gap. For comparison groups with small numbers you may use smaller comparison percentages or even numeric rather than percentage comparisons. These gaps can show subgroups who are over-represented or under-represented, and both should be addressed in the gap analysis.
  - At this point, a decision needs to be made as to the most effective way to address the identified gaps. This may mean focusing on certain programs, populations, or even certain courses. Addressing the identified gaps in participation or performance may not require an institution-wide intervention but one that is specific to where the gaps exist. Reward those that are meeting or exceeding the appropriate comparison groups participation or performance, thereby keeping the institution's performance up as a whole. Focus your improvement efforts where they are needed in as specific a way as possible.
- ✓ **Identify the potential root causes** that could be causing the gaps in participation or performance by reviewing the literature and creating a set of hypotheses for why the gaps exist. This process could be done at the institution level, program level, or course level or even focused on a particular activity, like guidance and counseling practices, or student support services. The decision depends on where the participation or performance gap first appears and why it might be appearing there. When developing a hypothesis it is important to remember that as institutional leaders, your perception of the existence of the root cause is an important first step, but it is not sufficient. You need to validate your root cause

hypotheses with those who are being impacted by it – the students. It is tempting to want to jump to the implementation of an intervention once a gap is identified, but identifying the reason for the gap is a critical intermediate step to ensure the successful selection and implementation of an intervention with the highest potential for success.

- ✓ **Conduct root cause action research** at the level of the identified subgroup gap to determine what is causing the gap to exist. These action research strategies may include conducting site visits, interviews, focus groups or surveys to identify the reason for the identified gap. Ideally, engage all stakeholders invested in the success of the process at the LEA level. Seek technical assistance from your state education agency or NAPE to build capacity to identify the reasons for the identified gaps. It is important to understand that the reasons for the subgroup gaps may not be the same at all schools in your district or with all subgroups, resulting in different interventions to close the gaps. This process will either validate your hypotheses or uncover other root causes that may be affecting student access and success.
- ✓ **Select an intervention aligned with the identified root causes.** Once the root causes have been identified, the intervention necessary to close that gap will become obvious. Be sure to refer to the local uses of funds provisions in the Perkins Act to be sure that your intervention is supported by these requirements (see above). Benchmark with LEAs and programs who do not show gaps in participation or performance in particular programs or with particular subgroups and identify why they have been successful. This research can help you identify effective strategies. Sometimes it is most effective to pilot an intervention before implementing more widely. Share your successes with others too. You may be eligible for State Leadership Fund Incentive Grants if your state chooses to implement this funding opportunity. Use resources, such as NAPE’s Root Causes and Strategies tools, to inform LEA’s of research-based strategies that have been effective in closing access and achievement gaps in CTE aligned with the root causes they have identified ([www.napequity.org/root](http://www.napequity.org/root)). The challenge is implementing interventions that are appropriate to the resources available and supported by all stakeholders.
- ✓ **Be creative and use Perkins V funding to support these efforts.** Pool resources with other LEAs with similar gaps to develop and implement a regional strategy that can be utilized by multiple LEAs. Encourage your state to use the 15% Reserve Fund (Sec. 112) and/or State Leadership Fund Incentive Grants (Sec. 124) to support technical assistance and professional development to help you with your gap closing strategy.

Review these resources to learn more about NAPE’s Program Improvement Process for Equity™ (PIPE™)

NAPE’s PIPE webpage: [www.napequity.org/pipe](http://www.napequity.org/pipe),

NAPE’s You Tube Channel – Increase Student Success Utilizing PIPE™ <https://youtu.be/rZJDIrWd7o>

Check out NAPE’s Perkins V Implementation Resources, including statewide data dashboards disaggregated at the cluster level at [www.napequity.org/perkinsv](http://www.napequity.org/perkinsv)

For more information on How to Conduct an Equity Gap Analysis and to learn more about NAPE’s Program Improvement Process for Equity™ contact Janay McClarin at [jmccclarin@napequity.org](mailto:jmccclarin@napequity.org).

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