



National Alliance for Partnerships in Equity

December 23, 2018

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

RE: Carl D. Perkins Career and Technical Education Act State Plan (Docket ID: ED-2018-ICCD-0108)

Thank you for the opportunity to comment on the Information Collection Request (ICR) on the Guide for Submission of State Plans related to the Strengthening Career and Technical Education for the 21st 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 special population students 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.

In the cover letter adjoining the State Plan Guide, Assistant Secretary, Scott Stump, reinforces that this new law provides an “opportunity to advance the Department’s vision for our nation’s CTE system: *Expand opportunities for every student to explore, choose, and follow career pathways to earn credentials of value.*” For NAPE, the operative word in this vision is *every*. The passage of Perkins V creates an important opportunity for state education agencies and local education agencies to show their commitment to educational equity as they embark on the development of state plans. These initial planning documents will set the stage for the direction that Perkins V takes over the next 10 years. NAPE asserts that equity must be the central theme of Perkins V state plans to ensure that the “vision for our nation’s CTE system” is realized.

With that in mind, NAPE makes the following suggestions to improve the State Plan Guidance –

Cover Letter

Strengthen the explicit statement of the U.S. Department of Education’s commitment to equity in CTE by including:

A statement as one of the key provisions bullets in the third paragraph of the cover letter, such as

- Improving equity in CTE is a central tenant in the new law. Increasing access, participation and success of students who have historically lacked access to high quality

CTE programs, including special populations, is a critical part of all aspects of the law and must be central to all planning and implementation of the new law.

A question for consideration in the fourth paragraph of the cover letter, such as –

- What programs, support services and professional development will you provide to ensure that CTE educators have the capacity to ensure every student, including special populations, earn valuable credentials in high quality, high wage CTE programs that lead to economic self-sufficiency?

These explicit statements supporting equity in CTE will help set the tone and raise expectations for states to do the same in their state plans.

Timeline for Eligible Agencies (pages 7-8)

Although these may have already been noticed -

Table 5 has date errors for FY 2021, FY 2022, FY 2023 and FY 2024

Table 6 has date errors for FY 2021, FY 2022, FY 2023 and FY 2024

II. Narrative Descriptions

A. Plan Development and Consultation (page 11)

Perkins V adds some new and critical partners as required participants in the State plan consultation process. To ensure that these groups are well represented and not just token additions to the consultation process, NAPE requests that the Department direct States to submit in the State plan a list of organizations, their consultation category, and the method of consultation they represent to ensure that these groups have had adequate voice in the development of the state plan. For example, it is critical that organizations representing all nine groups named in the special populations' definition provide consultation.

B. Program Administration and Implementation

1. State's Vision for Education and Workforce Development (pages 11-13)

Item d. asks States to describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of the Act for purposes under section 124 of the Act. However, the requirements of section 124 are not included in the State plan guidance description. To be consistent with other call out reference boxes in the guide that are helpful for State plan developers, NAPE recommends that a call out box with the requirements of section 124 be included. Also the instructions should state that each of the four items should be addressed in the plan. These include how the eligible agency will conduct State leadership activities that support:

- Preparation for non-traditional fields in current and emerging professions, programs for special populations, and other activities that expose students, including special populations, to high-skill, high-wage, and in-demand occupations; (sec. 124(a)(1)(A))
- Individuals in State institutions, such as State correctional institutions, including juvenile justice facilities, and educational institutions that serve individuals with disabilities; (sec. 124(a)(1)(B))

- Recruiting, preparing, or retaining career and technical education teachers, faculty, specialized instructional support personnel, or paraprofessionals, such as preservice, professional development, or leadership development programs; and (sec. 124(a)(1)(C))
 - Technical assistance for eligible recipients; and (sec. 124(a)(1)(D))
2. Implementing Career and Technical Education Programs and Programs of Study (pages 13-14)

Item f. asks States to include a copy of the local application template with no inclusion of guidance as to what that template must include. NAPE recommends that the Department adds a text box under 2.f. on page 14 that includes the new local application statutory language that can be found in Sec. 134(b) of the law. This is particularly important as the local application requirements for addressing equity in CTE has been strengthened in this law and there have been significant changes made to this section of the law. This will help ensure that States include the nine requirements for the local application in their template.

Item g. asks States to include a copy of the local needs assessment template but does not include any guidance as to what this template must include. NAPE recommends that the Department adds a text box under 2.g. on page 14 that contains the new comprehensive local needs assessment statutory language that can be found in Sec. 134(c) of the law. The new requirements for locals to conduct an equity gap analysis as part of the comprehensive local needs assessment is a critical part of ensuring that programs funded with Perkins funds address these equity gaps. Ensuring that the local needs assessment adequately addresses the complexities of the equity gap analysis requires that the Department be explicit in the guidance about the requirements of the law. This text box would remind states that this analysis includes disaggregating data and conducting a gap analysis for each of the nine special population groups and each subgroup in ESEA. The text box would also include Sec. 134(c)(2)(E)(i-iii) which requires states to describe strategies to overcome barriers that result in lower access to or performance for special populations, describe programs designed to help special populations meet performance goals, and describe activities to prepare special populations for good jobs that will lead to high-skill, high-wage, or in-demand occupations.

These additional text boxes would be in keeping with other text boxes found throughout the guidance where the Department has called out relevant statutory language that states should be aware of as they are drafting their plans. These three additional text boxes are particularly important as these are all new requirements in the law and address the issues of equity in CTE.

3. Meeting the Needs of Special Populations (page 15)

NAPE recognizes the Department for including a section in the State plan guidance that specifically addresses the needs of special populations as outlined in Sec. 122(d)(9) of the law. These provisions, in addition to many of the other provisions in the State plan guidance that reference special populations, are an important component of realizing the Department's vision for our nation's CTE system. However, nowhere in the State plan guidance is there a place for States to describe how they will use the three set-asides of state leadership funds (Sec.

112(a)(2)). Realizing that the law's description of the State plan contents only requires that assurances be made that these funds will be used it seems appropriate that considering their call out and level of resource investment that the State plans should also describe State's intended use of these funds. There has been a history of a varied level of quality, innovation and accountability for how these funds have been used. NAPE recommends that the Department asks States to describe how these funds will be used to ensure that adequate planning and consideration for how these funds can leverage other State and local activities to support equity in CTE are included in the State planning process. This section of the State plan guidance seems like the logical place to include these questions:

- How will the State use funds to implement career and technical education programs and programs of study for individuals in State institutions, such as (a) corrections institutions; (b) juvenile justice facilities; and (c) educational institutions that serve individuals with disabilities pursuant to section 112(a)(2)(A) of Perkins V?
- How will the State use funds to provide services that prepare individuals for non-traditional fields pursuant to section 112(a)(2)(B) of Perkins V?
- How will the State use funds to provide for the recruitment of special populations to enroll in career and technical education programs pursuant to section 112(a)(2)(C) of Perkins V?

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 broader definition of special populations. It is important for the Department to provide structure and guidance that will help the states and the local education agencies they will support to be intentional about being inclusive in their planning, thorough in their equity gap analysis at the state and local level, and intentional in using Perkins funds to address the diverse needs of students, especially those from special populations, in accessing and being successful in high quality CTE programs that lead to meaningful careers with family sustaining wages. 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.

Please contact me if you have any questions.

Sincerely,



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