



April 28, 2019

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 – Guide for the Submission of Consolidated Annual Reports –Comment Request (Docket ID number ED-2018-ICCD-0121-0020)

Thank you for the opportunity to comment again 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 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 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. NAPE's mission is to build 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 revised Guide for the Submission of Consolidated Annual Reports, NAPE wants to thank the Department for considering our previous comments and incorporating some of them in the revised Guide. However, there are changes that the Department made to the CTE Participant Enrollment Form and the CTE Concentrator Enrollment Form that NAPE is adamantly opposed to. The page numbers referenced are from the PDF file of the guide that was included in the Docket online.

II. Narrative Performance Report

Performance Data Reports

Pages 36 – 39 – IV.B.1a Secondary CTE Participant Enrollment Form, IV.B.1b Postsecondary CTE Participant Enrollment Form, IV.B.2a Secondary CTE Concentrator Enrollment Form, and IV.B.2b Postsecondary CTE Concentrator Enrollment Form. Our previous comment requesting

that these data also be disaggregated by race and special population subgroup may have been misunderstood. The change that has been made to these tables has removed the cross-tabulation of gender data with the career clusters – a practice we requested be done with race and special population in addition to gender. We hope this error can be corrected and our intended request be considered. At a minimum we ask that Gender, Race and Special populations be the rows in both the enrollment and concentrator tables and that career clusters be columns OR vice versa. The outcome being that these data can be cross-tabulated by student demographics and career cluster.

NAPE has found the gender and career cluster cross-tabulated 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. 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 and cross-tabulated with career cluster. Unfortunately our response has always had to be “no”. NAPE strongly encourages the Department to consider asking states under Perkins V to report the participant and concentrator career cluster enrollment disaggregated by gender, 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.

For the past 10 years NAPE has been working with states to create equity performance gap analysis data dashboards. These dashboards allow states to analyze data at the school and program level disaggregated by gender cross-tabulated with race and special population status. As states become more sophisticated in their ability to utilize CTE data the federal CAR should also encourage the same sophistication. The revised CAR participant and enrollment concentrator reporting forms are a step back from the data collected under Perkins IV where career cluster enrollment data was disaggregated by gender. The Perkins V CAR should ask for even more sophisticated data reporting which, based on NAPE’s experience, is available from most states. We would suggest that the participation and concentrator enrollment forms include male, female and all students for each of the career clusters (rows) cross-tabulated with race and each of the special population groups (columns). These data would allow for state and national analysis of CTE enrollment disaggregated by career cluster and gender cross-tabulated with race or special population status. For example, you could identify the enrollment rates of African American females in STEM or the male students with a disability in Health Careers.

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, 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,

A handwritten signature in black ink, appearing to read 'Ben Williams', with a stylized flourish at the end.

Ben Williams, PhD, Chief Executive Officer