



July 5, 2016

The Honorable John Kline
Chairman
House Education and the Workforce Committee
2176 Rayburn House Office Building
Washington, DC 20515

The Honorable Robert C. “Bobby” Scott
Ranking Member
House Education and the Workforce Committee
2101 Rayburn House Office Building
Washington, DC 20515

The Honorable Glenn Thompson
124 Cannon House Office Building
Washington, DC 20515

The Honorable Katherine Clark
1721 Longworth House Office Building
Washington, DC 20515

Dear Chairman Kline, Ranking Member Scott, Representative Thompson, and Representative Clark:

The Center for Law and Social Policy (CLASP) is pleased to provide comments on "The Strengthening Career and Technical Education for the 21st Century Act," proposed legislation released by the House Committee on Education and the Workforce on June 28, 2016. CLASP is a national non-profit organization that promotes policies to improve the economic security of low-income people and create pathways to education and work. We appreciate the sponsors' efforts to align federal Perkins Career and Technical Education (CTE) funds with some important elements with the Workforce Innovation and Opportunity Act (WIOA), including the definition of career pathways and other key language from WIOA's performance measures. However, we are very concerned about the bill's proposed rollback of state accountability, along with the reduction in required state Maintenance of Effort (MOE) funding, which could lead to state disinvestment in CTE.

The lack of federal accountability regarding negotiated target setting and sanctions represent a significant rollback of accountability from current law and in comparison to WIOA, a required local partner with CTE. Under the current Perkins law and under WIOA, federal agencies negotiate goals with states and hold them accountable for meeting these goals, to ensure that federal investment is used to support student outcomes. Under the bill as drafted, states would set their own goals without any input from the Department of Education. If the goals are not met, the Department would have no authority to impose financial sanctions, and would have no way of correcting the situation beyond state-written improvement plans. We hope these concerns will be addressed in future versions of the bill.

In addition, the reduction in required state MOE from 100 percent to 90 percent is very troubling. It is important to continue to require 100 percent MOE, so as to ensure that federal funds do not supplant existing state spending. States should know that if they cut spending for CTE, their federal CTE grant will decrease accordingly.

CLASP is encouraged by provisions in the bill that would align two important definitions with WIOA. First, adding to the Perkins Act a definition of career pathways – using language that is identical with the definition in WIOA and the Higher Education Act -- will allow systems to speak the same language at this critical phase in career pathway development. Second, including WIOA’s definition of out-of-school youth sends a strong signal that career and technical education programs should be serving this population. This signal would be further reinforced by including in the definition of “special populations” the following: “An individual who is subject to the juvenile or adult justice system” and “A youth who is an individual with a disability,” in addition to WIOA’s definition of low-income individual, which we recommended in our February 1, 2016 letter. With these additions, all categories of risk in WIOA’s out-of-school youth definition would be included in the definition of “special populations” in the Perkins Act.

The proposed new statutory definition of “program of study” is also a big step in the right direction. We support the bill’s language on “multiple entry and exit points that incorporate credentialing” and urge committee to retain this language. We suggest adding the words “including for adults” at the conclusion of this phrase, to emphasize that programs of study should have entry points for adults, not only for students who come to postsecondary CTE directly from high school. If this recognition about adults cannot be added to the bill, we would ask the committee to add report language to the same effect.

We support the bill’s strong alignment of Perkins state planning with WIOA state planning. By allowing state CTE programs to meet their Perkins planning requirements by submitting a WIOA Combined Plan, the bill would reduce duplication of effort and increase collaboration across systems. We appreciate the bill’s provisions ensuring that, even if a state chooses to complete a single Perkins plan, it would be better aligned with the state’s WIOA efforts, including a required summary of the strategic elements of the state’s WIOA plan and a congruent four-year planning period.

We thank the sponsors for their positive response to the recommendation of CLASP and others that Perkins postsecondary performance measures be aligned with WIOA indicators of performance. Measuring employment and earnings measures will encourage states to more closely connect their postsecondary career and technical training programs with local labor market needs. We hope that the additional focus on credential attainment will encourage CTE programs that lead to industry-recognized credentials. The committee may want to include report language to the effect that credentials ought to be relevant to the program of study and local labor market. It would be unfortunate if postsecondary CTE programs responded to the credential attainment performance measure by promoting easy-to-attain credentials that do not further the students’ ability to succeed in the labor market.

We also support the proposed new innovation grant program, including the provision that would address the need for a well-trained early childhood education workforce. The inclusion of this language would clear up the common misunderstanding that early childhood education (ECE) workforce programs cannot qualify for Perkins funding because the jobs are not high-skill or high-wage. On the contrary, a well-trained ECE workforce is in high demand in many parts of the country, especially as higher levels of education are required to work in ECE. Notably, some career pathways programs in ECE training have leveraged Perkins funding for curriculum expansion, accessibility to high schools through Program of Study articulations, and improved delivery with instructor support and lab development -- while tapping non-Perkins funds for other aspects of the program, like tuition.

Last, in what may have been an oversight, the bill as drafted no longer includes a required use of leadership funds to support programs for special populations. We suggest you add to the list of required uses of funds, “Support for programs for special populations that lead to high-skill, high-wage, or high-demand occupations.”

Please direct general questions to Anna Cielinski at acielinski@clasp.org and youth-related questions to Andrea Amaechi at aamaechi@clasp.org.

Sincerely,

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