



JOBS FOR THE FUTURE



October 28, 2015

Senator Mike Enzi
U.S. Senate
379A Senate Russell Office Building
Washington, DC 20510

Senator Robert P. Casey Jr.
U.S. Senate
393 Russell Senate Office Building
Washington, D.C. 20510

Re: Joint Recommendations for Reauthorization of Carl D. Perkins Career and Technical Education Act

Dear Senator Enzi and Senator Casey,

We thank you for the opportunity to provide recommendations around bipartisan principles as you begin the process of reauthorizing the Carl D. Perkins Career and Technical Education Act (the Perkins Act, or Perkins). Our three organizations—the Center for Law and Social Policy (CLASP), Jobs for the Future (JFF), and New America—have agreed on this set of joint recommendations for reforms to the Perkins Act that can help America’s current and future workforce, including special populations such as low-income adults and youth, learn necessary skills and earn industry-recognized postsecondary credentials that enable them to succeed in the labor market.

Perkins reauthorization offers an opportunity to supplement and strengthen the foundation of Perkins IV, which stressed academic and technical rigor and established programs of study, by now moving to align Perkins with the career pathways systems, sector partnerships, performance measures, and data systems authorized by the Workforce Innovation and Opportunity Act of 2014 (WIOA). Since the Perkins Act’s last reauthorization, state and local partners have achieved innovative collaborations through the successful development of programs of study and career pathways system development, though not necessarily in concert. The implementation of WIOA offers the promise of connecting these systems to improve the effectiveness and efficiency of career and technical education in our country.

Our recommendations below respond in turn to each of the bipartisan principles (in bold) outlined in the committee staff’s e-mail of October 19, 2015.

Make it easier for States and locals to run their CTE programs to serve all students who desire to gain access to CTE coursework, including students with disabilities

We agree that all students, including students with disabilities, should have access to CTE coursework. However, while flexibility for state and local programs can be desirable, we strongly urge the committee to further strengthen the requirements related to programs of study, as follows.

Rigorous programs of study, which provide seamless pathways for CTE students to move from high school to college, have led to significant improvements in the academic rigor and quality of CTE programs. Reauthorization provides an opportunity to strengthen and expand this focus on programs of study, establishing seamless pathways from secondary to postsecondary education that result in credential attainment. Perkins reauthorization should also require postsecondary institutions to strengthen on-ramps to postsecondary CTE programs for out-of-school youth and adult learners, including those that may not have earned a high school diploma or equivalent. Through partnerships with local workforce boards, adult education providers, and community-based organizations, postsecondary institutions should be encouraged to develop integrated education and training (IET) programs that contextualize and integrate basic academic skills and occupational training.

Increase access to, and support of, career counseling for all CTE students

We agree that increasing access to, and support of, career counseling for CTE students is essential. Particularly in the postsecondary context, this career counseling should leverage services available at American Job Centers (or one-stop centers) through WIOA where practical. Counseling should also take advantage of labor market information (LMI) provided by the workforce system.

Maintain CTE as a formula program

Maintaining a formula funding structure is the most politically feasible course to reauthorization, and we appreciate the need to ensure that all students have access to high-quality CTE programs of study. We support requirements that local education agencies and postsecondary education institutions form consortia for the purposes of building effective programs of study.

To better target funding to the expansion of CTE programs of study that are aligned with career pathways system development and other workforce education and training efforts, we propose an alternative formula for Perkins funding.

This alternative formula would maintain the current allotment of funds to states, with states retaining at least the current 15% for state activities. However, we propose that either all of the 85% local funding, or a significant portion of the 85%, be allocated regional consortia by a state formula (not by competition). Under such a model, local or regional consortia of secondary and postsecondary education entities would be formed for the purpose of implementing regional secondary and postsecondary CTE activities – with a major emphasis on CTE programs of study. States would be encouraged to establish local regional boundaries for consortia that are aligned with local areas or regions established under WIOA, as best fits the broader labor market and service delivery geographic considerations in each state.

Consortia would coordinate with regions established under WIOA and with local workforce systems to identify the high demand industry sectors/clusters that would be the focus of programs of study as well as WIOA sector and career pathways efforts. Ideally, states and regional CTE consortia would engage in joint planning with workforce systems under WIOA and with other education and training programs.

Employer engagement efforts, LMI development and use, identification of in-demand industry sectors/clusters, program design efforts, and the pursuit of policies and resources could be fully aligned.

Programs of study should be recognized in the Perkins Act, and by states and regional consortia as a critical component of comprehensive career pathways systems – the entry point for secondary students.

Align with ESEA and WIOA (where applicable) to improve the efficiency and effectiveness of the education and workforce development programs

Aligning CTE and WIOA allows for critical improvements in leveraging the workforce development system by both parties. Perkins could be best improved by aligning its planning, performance measures, and data availability with WIOA.

First, we recommend that postsecondary CTE be a required partner in WIOA Unified Planning. Currently, postsecondary CTE is an optional participant in WIOA Combined Planning, which is an optional, more comprehensive planning activity. Unified Planning currently includes only the six “core” programs under WIOA. Because postsecondary CTE is a required one-stop partner -- meaning the program contributes financially to infrastructure costs of the one-stop centers -- these partners have a financial stake in the WIOA system and thus should be integrated into Unified Planning. Earlier this year, a discussion draft in the House on TANF reform included language that would have the effect of including TANF as a required partner for WIOA Unified Planning. A modified version of that draft language could be used for this purpose.

Next, we recommend that the current Perkins postsecondary performance measures be aligned with WIOA’s indicators of performance, which are common across the six core WIOA programs. This change would make clear postsecondary CTE’s role in offering education leading to credentials in particular occupations or industries. It is important to note that aligning with WIOA measures would require quite a major shift in the way data is reported, specifically, from using an entry cohort model to an exit cohort model. *Building on its ongoing and comprehensive work on federal performance measures, CLASP can provide detailed recommendations on aligning WIOA and Perkins performance measures, should the committee be interested.*

Data quality and availability has been a challenge for some postsecondary CTE performance measures. For instance, “student placement” is often determined by students self-reporting whether or not they got a job, which does not have the reliability that should be required of a federally-funded program. With a shift to WIOA performance measures, Perkins should also explicitly provide CTE with legal access to states’ Unemployment Insurance wage record data and to WIOA’s interstate wage record data sharing agreements for this limited purpose, which would enable CTE programs to be measured on actual labor market outcomes, including employment and earnings, rather than unreliable self-reported data.

To further improve federal program alignment, we suggest that Perkins adopt the definition of “postsecondary recognized credential” included in WIOA, and use it to hold programs accountable for ensuring students obtain high-quality credentials. The definition in WIOA includes degrees, licenses, and

industry-recognized certificates and certifications, which would provide programs more flexibility to identify credentials to help students advance educationally and in their careers.

RECOGNIZED POSTSECONDARY CREDENTIAL.—The term “recognized postsecondary credential” means a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.

In addition to credential attainment, we support intentional alignment between the CTE technical skill assessment structure and the WIOA measure skill gain performance measure. This alignment would incent greater partnership between WIOA core partners and their CTE partners.

Support the expansion of public/private collaborations with secondary and post-secondary programs, including alignment with State or locally determined in-demand industries and occupations.

Employer engagement is essential to the development and implementation of effective CTE systems and especially to successful programs of study. Employer engagement is critical for the identification of in-demand industries and occupations, the competencies and credentials required for those industries and occupations, and strategies for assessing students’ proficiency in industry-recognized competencies and credentials.

Employers must be actively engaged in the design and development of aligned career pathways systems and of the individual occupational pathways and programs. It is important that CTE systems work closely with state and regional workforce boards, economic development partners, and employers to analyze and validate the most recent available LMI for determining the employment and skill needs of high-demand industries and occupations in their states and regions. CTE and the workforce systems should also work closely to ensure the alignment of CTE’s career clusters with WIOA’s career pathways and industry partnership development efforts, to ensure that all systems are using the same, most up-to-date labor market information; training around career clusters is aligned with sector-based training at the postsecondary level; students, jobseekers and workers have access to the full range of high-demand careers available in their states and regions; and confusion and duplication are minimized in the development of education and training programs for high-demand occupations, especially for employers in those fields.

Support efforts to integrate into and strengthen career pathways at the state and local levels

We strongly agree that this Perkins reauthorization should support efforts to integrate into and strengthen career pathways at the state and local levels, and recommend that the WIOA definition of career pathway should be incorporated in Perkins reauthorization.

WIOA introduced the first federal statutory definition of a career pathway, a strategy for supporting students, including individuals with barriers to employment, through a series of well-connected education and training and work experiences that lead to progressively higher levels of education and employment. Secondary CTE innovations, like Irvine Foundation’s Linked Learning initiative, have

moved beyond the Perkins IV program of study model to include linked academics and occupational training, support services, and work-based learning structures that constitute a complete career pathway program. WIOA Title II and postsecondary CTE are the key education partners in building career pathways beyond secondary school. While Perkins IV includes a program of study mandate for linking secondary to postsecondary education, the WIOA career pathway definition should be included in Perkins reauthorization to support the scaling and dynamic sustainability of career pathway programs for the target populations of WIOA and Perkins, including out-of-school youth and adults. The seven-part WIOA definition of career pathways is as follows:

CAREER PATHWAY.—The term “career pathway” means a combination of rigorous and high-quality education, training, and other services that—

(A) aligns with the skill needs of industries in the economy of the State or regional economy involved;

(B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an “apprenticeship”, except in section 171);

(C) includes counseling to support an individual in achieving the individual’s education and career goals;

(D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

(E) organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;

(F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and

(G) helps an individual enter or advance within a specific occupation or occupational cluster.

Improve evaluation and research to support innovation and best practices

We support improving evaluation and research to support innovation and best practices, but note that this should not take away current funds, but rather may require new funding. Evaluation and research can be difficult because the CTE program’s accountability system depends on each individual state to determine how inputs and outputs are defined and measured. Even the definition of what constitutes a career education student (or “concentrator”) varies by state, as do the methods by which employment and earnings data are collected. As a result, it is very difficult for federal and state policymakers to determine program performance and what value it is generating for students, institutions, employers, and taxpayers. The reauthorization of Perkins provides an important opportunity to address this

concern. Lawmakers should create a simple set of definitions and outcome metrics that enable valid comparisons across states. Specifically, we recommend the following:

- Require states to use wage records collected by the state Unemployment Insurance (UI) agency to calculate student employment and earnings outcomes, and provide state CTE programs with explicit legal access to states' UI wage records and WIOA's interstate wage record data sharing agreements for this limited purpose. While state UI wage records do not cover the entire workforce, they provide a far more comprehensive and accurate picture and student employment and earnings outcomes than any survey method can provide.
- For purposes of accountability, create federal definitions of "CTE concentrator" and all outcome metrics (employment, earnings, credential attainment, and transition to postsecondary) that all states must use for reporting purposes. Common definitions will support more rigorous evaluation of CTE programs, enabling cross-state comparisons and the identification of evidence-based best practices.

We welcome the opportunity to meet with you to discuss these recommendations further. Please direct questions to Anna Cielinski (CLASP) at acielinski@clasp.org, Mary Clagett (JFF) at mclagett@jff.org, and Mary Alice McCarthy (New America) at maryalice.mccarthy@newamerica.org.

Sincerely,

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Jobs for the Future (JFF)

New America