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Special Populations in Perkins V State Plans: *Guidance for States*

CLASP

Policy solutions that work for low-income people

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Introduction: CTE as an Equity Lever

Passage of the “Strengthening Career & Technical Education for the 21st Century Act” (Perkins V, which reauthorizes federal legislation funding career and technical education (CTE), brings the opportunity to improve the quality and accessibility of CTE for adults with low incomes; English learner adults; out-of-school youth; and adults with barriers to obtaining family-sustaining jobs. These marginalized populations have historically been underrepresented in the CTE student population due to multiple barriers affecting their ability to access high-quality CTE programs. These barriers include poverty, financial aid, child care, transportation, lack of academic preparation and educational opportunities, family obligations, language barriers and many more. To improve access to high-quality CTE, however, states must focus on technical skills and academic rigor, including access to upper-level courses, to improve the quality of CTE in both secondary and postsecondary education and move away from tracking historically underrepresented students into dead-end jobs and careers.

If implemented well, high-quality CTE programs of study that prepare students for high-skill, high-wage, in-demand careers can serve as an equity lever and pathway to economic and social mobility. Research suggests that high-quality CTE programs may improve academic and workforce outcomes for students.¹ These programs may also lead to students enrolling in and completing community college.² However, the programs alone will never be enough to move youth and adults with low incomes along pathways out of poverty. The CTE field must take the opportunity presented by Perkins V to evaluate its ability to strengthen career pathways and improve wrap-around services to fulfill its vision by closing the access and performance gaps between students of privilege and special populations.

An Important Change to Current Law

In the spirit of this vision, Perkins V expanded the definition of special populations and included career pathways as a significant cornerstone to CTE's improvement. Perkins includes the same definition of career pathways currently found in the Workforce Innovation and Opportunity Act (WIOA), and the Higher Education Act (HEA).³ The definition of special populations includes individuals with disabilities; people from economically disadvantaged families, including youth and adults with low incomes; individuals preparing for nontraditional fields; single parents, including single pregnant women; out-of-workforce individuals; English learners; people experiencing homelessness; youth who are in, or have aged out of, the foster care system; and youth with a parent on active duty in the military. These provisions signal the importance of aligning the education and workforce development systems to meet the education and employment needs of people with low incomes, educationally underprepared adults, and out-of-school youth. Alignment, however, is never enough. States must be intentional about ensuring that students, workers, and individuals with low incomes are able to access career pathways and have the guidance and supports they need to progress and advance along such pathways.

Advancing Equity in CTE: Advice for States and the Field

As states are fully engaged in the development of their four-year plans covering FY 2020-23, they should take this opportunity to set a new direction for CTE that addresses the needs of more learners to obtain jobs paying family-sustaining wages and who can help meet local workforce development needs. In using the Guide for the Submission of State Plans released by the U.S. Department of Education, Office of Career, Technical and Adult Education, states should consider the following as they embark on the development of their Perkins V state plans.

A. Plan Development and Consultation

States should include in their stakeholder consultation the 36+ groups, organizations or individuals named in Perkins V (See Appendix A). This may seem like an overwhelming challenge, but it is critical to the development of a comprehensive high-quality CTE system that those with the most barriers to access be heard in this process. When conducting outreach to identify stakeholders, states should consider expanding their list of organizations, including groups and organizations they have not worked with previously. States should personally invite representatives of marginalized populations to ensure they participate in the process. States must also include representatives and organizations that serve each of the nine special populations and not simply lump them together as a single group. In particular, states should identify organizations that serve the homeless, work with low-income adults, run out-of-school youth programs, conduct programs for people who are incarcerated, serve military families, offer English language training, conduct pre-apprenticeship programs for women in the trades, support

students with disabilities, etc.. These community-based organizations are critical partners in ensuring that states have the right supports to help students succeed in CTE. Such organizations need to be part of Perkins state plans.

Understanding the academic preparation needs of youth and adults for whom the education system was an unsuccessful pathway to a high school diploma is also a critical component of the Perkins state plan. Conducting stakeholder outreach with adult school and workforce development programs that serve this population will help states identify the kinds of on-ramps they need to develop to connect GED preparation and CTE. This will help ensure these students have a career pathway that leads to a job with family-sustaining wages.

States need to create opportunities for public comment in person and in writing that are comprehensive, accessible, and conducted over a long a period of time. When working to develop input strategies, states should consider how individuals without internet access or transportation, or who may be fearful of schools, could provide input. States must use their community-based partners as conduits for input and be proactive in their efforts to reach those populations not engaged in CTE but who could benefit significantly if they were. States should hold input events at community organizations, churches, tribal organizations, and traditional gathering places in low-income communities. States should promote the opportunity to provide input in local free newspapers, social service mailings, laundromats, churches, military bases, food banks, homeless shelters, and other places that low-income and out-of-school youth frequent.

Perkins V also explicitly encourages the coordination and alignment of state workforce development systems and CTE. Identifying the best strategies for doing this in a state can come from those working in these systems locally and through the engagement of other state agencies with authority for workforce development and CTE. By engaging adult education, state and local workforce boards, vocational rehabilitation, disability services, special education, higher education, and human service agencies in their input strategy, states may uncover collaboration opportunities and better ways to use resources and eliminate barriers to CTE in these systems.

This section of the Guide for the Submission of State Plans asks states to describe the split of funds among adult CTE, postsecondary CTE, and secondary CTE. States that administer CTE through separate secondary and postsecondary agencies should consider where adult CTE students are served and how they will allocate their resources to support programs that serve them. States should figure adult students into their split formulas and be explicit in their plans about how the needs of these students influenced their decisions.

B. Program Administration and Implementation

1. Advancing Equity in the State's Vision for Education and Workforce Development

Articulating a vision for CTE that centers equity and addresses how CTE will meet the goals to increase the participation of special populations requires that states explicitly address them. States should not get into the trap of assuming that everyone understands the meaning of “all students.” Preparing an educated workforce that includes each of the special population groups and meets the workforce needs of employers will not be business as usual. A state plan can signal to the CTE community that closing equity gaps and addressing the needs of special population students is a priority if the plan’s vision and goals explicitly state so.

Engaging other federal programs (WIOA, ESEA, HEA) in creating a state’s vision for CTE, whether through joint planning or as part of a stakeholder input strategy, should result in efforts to align, coordinate, and leverage funds. States can generate greater cost efficiencies by reducing duplication of services when analyzing how they use their resources; how they implement their programs; and which stakeholders are implementing them. More importantly, this can create more alignment among systems and make them easier to navigate by those they are intending to serve. This effort will require all partners to be willing to identify how best to meet the needs of students, not systems. This effort should extend well beyond the development of the Perkins state plan and become the standard for any education and workforce development initiative moving forward.

Perkins V includes five required uses of state leadership funds, three of which address special populations specifically. These required uses include: preparation for nontraditional fields; programs for special populations; and support for individuals in state institutions such as state correctional institutions, juvenile justice facilities, and institutions that serve students with disabilities. In addition, Perkins V specifies three state leadership fund set-asides—all addressing programs for special populations:

- not more than 2 percent shall be made available to serve individuals in state institutions, such as state correctional institutions, juvenile justice facilities, and educational institutions that serve individuals with disabilities;
- at least \$60,000, and not more than \$150,000 shall be used for services that prepare individuals for nontraditional fields; and
- not less than the lesser of .1 percent or \$50,000 for the recruitment of special populations to enroll in CTE programs.

States have an opportunity to set the culture of CTE through the initiatives that these state leadership funds support. Again, this is not the time for business as usual. States should use leadership funds to incentivize the development of high-quality CTE career pathways with high participation rates of special populations and that result in students’ placement in high-skill, high-wage, and high-demand jobs. For example, state leadership funds can be used to:

- Create and scale career pathway models for adults with low incomes and out-of-school youth that lead to employment in nontraditional fields through apprenticeships and other industry partnerships.

- Fund professional development that increases the capacity of educators and service providers to collaborate and align programs and services to meet the needs of students with disabilities to ensure their participation in CTE and successful transition into postsecondary education
- Support the development of model programs that provide access to CTE programs of study for justice-impacted adults and youth in juvenile justice facilities that result in industry-recognized credentials and employment upon returning to society. Facilitate the creation of policies that lead to the expungement of records for non-violent crimes for students who successfully complete these programs.
- Provide incentives to institutions developing adult career pathways that leverage Perkins funds with local funds to provide comprehensive support services such as child care, transportation, tutoring, translation services, accommodations, financial aid, books, materials, tools, uniforms, etc.
- Partner with targeted communities to conduct an outreach campaign specific to each of the nine special population groups to recruit them into high-wage, high-skill, high-demand CTE programs by using local open houses, hands-on career fairs, community-maker spaces, and summer programs where potential students can experience a program before enrolling.
- Offer incentive grants for the development of model programs that are successful with the most educationally underprepared adults and out-of-school youth, such as individuals experiencing homelessness, to complete CTE programs of study.
- Build data visualizations of Perkins disaggregated data and conduct professional development in their use to assist Local Education Agencies (LEAs) in completing their gap analysis as part of the Comprehensive Local Needs Assessment (CLNA). Collaborate with other state agencies to help make state, regional, and local labor market data and other data sources available to inform the CLNA.

2. Implementing High-Quality CTE Programs and Programs of Study

This new state planning cycle provides an opportunity for states and LEAs to evaluate their current CTE offerings, align them with local labor market needs, build high-quality career pathways, and ensure equal access and participation of special populations. The local application will serve as the lever for making changes and ensuring that the intent of Perkins V is clear to administrators who are responsible for implementing CTE at the local level. This may mean closing some programs and starting new ones. It will also require a holistic approach to implementing CTE that includes multiple entry and exit points, employer-informed credentials, and comprehensive support services—not just the implementation of a program.

States must communicate within the communities impacted by these changes to ensure they are aware of new opportunities and take advantage of them. Much like the suggestions for the state plan's stakeholder outreach, LEAs must be required to address in their applications how they will conduct

outreach in nontraditional ways and use multiple language media outlets and community-based partners to reach marginalized communities. States can also create a state-wide CTE media campaign that LEAs can leverage locally through branded, adaptable media kits.

Perkins V emphasizes the use of career pathways to improve CTE, especially for currently underserved students with multiple barriers. Aligned with the definition in WIOA and HEA, Perkins V requires the state plan to address how the CTE and workforce boards will collaborate. States should include explicit requirements in the local application at the adult and postsecondary level that requires alignment of these systems to ensure successful completion by low-income adults, out-of-school youth, and other special populations.

States should also include dual enrollment as a strategy for accelerating academic and technical skill attainment for educationally underprepared adults working on their GED in secondary school settings. These students will benefit from dual enrollment in postsecondary CTE, where they can see the application of their academic preparation and connect to future career opportunities. Another best practice for states is to require LEAs to include adult education students as eligible to participate in dual enrollment programs.

The CLNA requirement in Perkins V is an opportunity for LEAs to take a fresh look at how their CTE programs are meeting the needs of employers and students. States must require LEAs to conduct a complete equity gap analysis as specified in the CLNA. By analyzing the participation, performance, retention, completion, and placement of each of the disaggregated groups (gender, race, and each of the nine special population groups) at the building and program level, states can uncover the barriers that students face. When states understand these root causes before implementation, they can choose appropriate career pathways that include the supports necessary for every student to succeed.⁴

3. Meeting the Unique Needs of Special Populations

This section of the State Plan Guidance is an opportunity for states to specify how they will leverage state leadership activities, the local application, and CLNA to address the needs of special populations in the state. Beyond assurances, states must describe what they will do and how they will require or incentivize locals. Although many of these strategies will be included in other parts of the state plan, this section requires a specific focus on special populations. Because of the diversity of the nine special population groups, states should address each of the groups separately where appropriate because the kinds of programs, services, supports, and resources will vary widely.

The first step in understanding where the state needs to focus its efforts is to conduct a statewide gap analysis. States should use their current Perkins data to identify those special populations that are underperforming on the current measures or are underrepresented in particular programs. If a state's current data system allows it to manipulate its data to align with the new measures in Perkins V and the new definition of concentrator, the state can create a baseline for the current measures and disaggregate the data to identify gaps by subgroups. This will give the state a rationale for the

strategies it will choose to emphasize in this section of the plan.

Low-income adults, out-of-school youth, English learners, and out-of-workforce individuals are likely to emerge as subgroups that are falling behind. States should include strategies that connect CTE systems at the state and local level to workforce development boards and providers serving these populations. States should create bridges for these students to upgrade their academic skills, obtain a GED or high school diploma, and acquire the job skills training through dual-credit CTE programs. A state should require LEAs to follow the career pathway model for new program development and for increasing the quality of relevant existing programs. States should allow Perkins funds to be used for support services for special populations based on the CLNA findings. States must build systems that support dual enrollment in adult education and CTE. States should also encourage LEAs to braid local funding and partner agency support services to build comprehensive wrap-around services to ensure there are no barriers for special populations to be successful in CTE. States must provide professional development opportunities for CTE educators to build their capacity to: implement culturally relevant instruction that creates equitable learning environments and closes achievement gaps; use accommodations and modifications that benefit students with disabilities; advocate and access support services for special populations; and develop career pathways that engage all education, workforce, labor, and business partners in the community so special populations can enter high-skill, high-wage, and in-demand occupations.

4. Preparing High-Quality CTE Teachers and Faculty

One of the challenges in CTE is finding qualified faculty who have both the technical skill proficiency and the training in pedagogy. Often the latter is less valued than the former, creating a situation where teachers and faculty don't have the skill set to manage a classroom or create a positive learning climate. In addition, when states implement career pathways as defined in Perkins V, they must collaborate with and coordinate the many partners engaging special education teachers, school principals, administrators, counselors, specialized instructional support personnel, and paraprofessionals within the school, as well as community-based organizations, workforce agencies, social service agencies, and business partners outside the school. All these individuals will need professional development to ensure that CTE programs of study and career pathways are designed and implemented to meet the needs of special populations and ensure their success. This professional development will need to include data collection and analysis; program evaluation techniques; instructional strategies for creating equitable learning environments; program design and best practice models; cross-agency collaboration facilitation; and collective impact, to name a few.

C. Fiscal Responsibility

Much of this section of the state plan is set by formula. However, the first two parts that describe the criteria and process for how the eligible agency will approve eligible recipients for funds and how the secondary, adult and postsecondary splits are made must be consistent with the vision, goals, and priorities set in the former sections of the plan. As part of their special population strategy, states must

invest resources to increase the academic and technical skill proficiency of low-income underprepared adults, out-of-school youth, English learners, and adults with barriers to obtaining or upgrading employment. This starts with funding approved programs of study and career pathways that serve these students, and other special populations, at the secondary, adult, and postsecondary level.

D. Accountability Should Advance Equity and Produce Better Outcomes for All

This section of the state plan is the true indicator of the state's commitment to its vision and goals and to improving the quality of CTE—as the adage goes: “You measure what you treasure.” The state determined performance levels (SDPL) that states set in their plans have significant implications for the next four years. If possible, a state should run a baseline analysis of “concentrators”⁵ using the new measurements as a place to start. If this analysis can be done for at least three years back, a trend analysis will help to determine an appropriate improvement target for each year moving forward.

States should disaggregate baselines at the LEA and program level and by each of the subgroups to help set rigorous improvement targets and to predict where extra investments can ensure continuous improvement. States should look at other federal laws that require accountability similar to Perkins, such as WIOA and ESEA, and align improvement targets.

States should get broad stakeholder input as part of their overall outreach efforts. When introducing the measures and seeking public comment, states should be clear about what the measures mean so that input is based on common understanding. States should provide a way for commenters to ask questions or seek clarification before final comments are required. States should also be sure to solicit feedback from those impacted by their performance on the SDLPs, especially from programs that serve high percentages of special-population students, as the performance of these subgroups will determine if a state meets its measures and/or is able to close subgroup performance gaps. This will be crucial for those that serve the new subgroups in the Perkins special populations definition, such as students with low incomes, homeless individuals, foster care youth, and youth with an active military parent. This may require that states send targeted invitations to students asking them to comment virtually or face-to-face.

States should keep in mind that even though Perkins V does not require that SDPLs be set by subgroup, it does require that these data be reported by subgroup and that improvement plans and potentially sanctions are triggered by disparities in subgroup performance. States should identify a plan for how to address subgroup disparities in future years by:

- Alerting low performing LEAs and requiring the use of at least 25 percent of the Perkins allocation to implement programs with the targeted subgroup to close the gap.
- Identifying high performing LEAs, studying what they are doing, sharing best practices, replicating programs, and taking them to scale where feasible.

- Identifying low performers and providing professional development, technical assistance, and/or additional funding to implement supplemental programs and support services.
- Creating and facilitating a professional learning cohort of schools experiencing similar gaps and providing subject matter experts as technical assistants.
- Conducting an equity audit of the low performers to help identify the root cause(s) for the gap and requiring LEAs to use their Perkins funds to implement an aligned research-based strategy.
- Using the 15 percent reserve (Section 112) to fund any or all of the above activities.

Conclusion

A thorough and thoughtful state planning process that places equity and quality at the center can improve CTE across this nation. As states embark on the Perkins V state planning process, they should keep focused on how the improvements they are galvanizing through funding, state leadership activities, and accountability are increasing access and success for special populations. All students benefit when states meet the needs of marginalized students—particularly those who have not been served well by the system or who have not been able to access high-quality CTE programs. States should think outside the box, generate new ideas, hear from those closest to the students, create new partnerships and deepen those that currently exist, and dare to be bold!

Appendix A

Stakeholder Consultation

Organizations and Individuals identified in Perkins V to engage in stakeholder consultation:

1. MSI/HBCU/Tribal Colleges
2. Adult CTE providers
3. Charter school representatives
4. Community representatives
5. Parents
6. Students
7. Teachers/faculty
8. School leaders
9. Specialized instructional support personnel
10. Career guidance counselors
11. Academic guidance counselors
12. Paraprofessionals
13. Community organizations
14. WIOA Workforce Board
15. Single parents
16. Single pregnant women
17. Individuals with disabilities
18. Individuals with low incomes
19. People preparing for nontraditional fields
20. Individuals who are out of the workforce
21. English learners
22. People experiencing homelessness
23. Youth in the foster care system

24. People who have aged out of the foster care system
25. Youth with an active duty military parent
26. Business representatives
27. Small business representatives
28. Representatives of industry and sector partnerships
29. Labor organizations
30. Agencies serving out-of-school youth
31. Agencies serving at-risk youth
32. State Coordinator for Education of Homeless Children and Youths
33. Representatives of Indian Tribes
34. Representatives of Tribal organizations
35. Governor
36. Heads of other state agencies with authority for CTE

Endnotes

¹ Advancing Racial Equity in Career and Technical Education Enrollment, Ryan Smith, Center for American Progress Policy Brief, August 2019 available at <https://www.americanprogress.org/issues/education-k-12/news/2019/08/28/473876/advancing-racial-equity-career-technical-education-enrollment/>

² Ibid.

³ For more information about Career Pathways see Career Pathways in Career and Technical Education, Anna Cielinski, CLASP Policy Brief, January 2019 available at <https://www.clasp.org/publications/report/brief/career-pathways-career-and-technical-education>

⁴ Resources on the CLNA and Equity Gap Analysis can be found at:

Advance CTE - <https://careertech.org/perkins-virtual-resource-table#Local%20Application/Local%20Needs%20Assessment>

National Alliance for Partnerships in Equity - <https://www.napequity.org/public-policy/frontline-legislation/strengthening-career-and-technical-education-for-the-21st-century-act/#vresources>

⁵ Perkins V defines concentrators as: a student at the secondary level who is served by an eligible recipient and has completed at least 2 courses in a single CTE program or program of study; and a student at the postsecondary level who is enrolled in an eligible recipient and has earned at least 12 credits within a CTE program or program of study or completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.