

CLASP

Policy solutions that work for low-income people

December 12, 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).

CLASP is a national, nonpartisan, anti-poverty nonprofit advancing policy solutions for low-income people. We develop practical yet visionary strategies for reducing poverty, promoting economic opportunity, and addressing barriers faced by people of color. We believe high-quality career and technical education (CTE), particularly at the postsecondary level, can help low-income learners and learners of color move along career pathways into jobs with self- and family-sustaining wages.

Importance of Postsecondary CTE

'Split of funds'

CLASP strongly supports encouraging states to think anew about the secondary/postsecondary split in Perkins funding. The question in the opening letter—"What is the right 'split of funds' between secondary and postsecondary programs given today's environment?"—rightly puts that issue front and center for states. In many states, postsecondary CTE is dramatically underfunded at a time when employers are calling for more workers with technical skills. High-quality postsecondary CTE programs are incredibly important for "special populations" (including low-income adults) and people of color to move into in-demand jobs with good wages. We encourage you to keep that critical question in the letter.

WIOA Combined Plans

We also strongly support the option for "WIOA Combined State Plan – *Postsecondary Only*" under "Special Features of a State Plan Submission" on page 11. Perkins V emphasized alignment with WIOA, and this option will incentivize postsecondary CTE to engage directly with the workforce and adult education systems to align programs and systems to meet the needs of both postsecondary and adult education participants and the needs of local industries. This is especially relevant for special populations (including low-income adults) and people of color who may not have been well served in the traditional K-12 system or may be new arrivals to their communities. We urge you to encourage states to consider this plan option and reduce barriers for states to do so. For example, the Department should offer more guidance in the ICR on how a "WIOA Combined State Plan – *Postsecondary Only*" would work on the ground. We also recommend that ED clarify whether a state would have to do both a full Perkins State Plan and a WIOA Combined Plan—*Postsecondary Only*. We also support the option for WIOA Combined State Plan—*Secondary and Postsecondary*. In

the instance that a state chooses this option, they should not be required to submit a second duplicative Perkins State Plan.

Career and Technical Education Programs and Programs of Study

Throughout the document, “career and technical education programs” and “programs of study” are most often connected with the word “and,” but occasionally the terms are connected with the word “or.” It is very important that “and” be used through the document, so that states must focus not only on programs of study that originate in high school and proceed to postsecondary, but also on postsecondary career and technical education programs that serve adults who are not coming straight from high school, often including low-income adults and people of color who may be less likely to proceed directly from high school to postsecondary education. This is also important for the lifelong learner who may have gone straight to employment or completed some postsecondary after high school and is now upskilling to stay relevant in the changing world of work. Giving states the option to focus only on programs of study that originate in high school limits the ability of postsecondary CTE providers to offer upskilling opportunities to adults. The most important example is on page 14, under 2.a., where a state could address only a program of study and not career and technical education programs generally. We urge the department to change the word “or” to “and” on page 14, in the first line under 2.a.

Equity and the comprehensive local needs assessment

The comprehensive local needs assessments in Perkins V provides an important new opportunity for eligible agencies to address equity in their programs, especially for special populations. Therefore, states must focus on equity as they prepare their local needs assessment template. Unfortunately, the state plan template asks only that states include a copy of the local needs assessment template that eligible agencies will submit, without providing any additional information on the statutory requirements for this local assessment template.

We recommend the Department add a text box under 2.g. on page 15 that contains the new comprehensive local needs assessment statutory language that can be found in Sec. 134(c) of the law. This will ensure that states, when submitting their plans, will carefully consider how to describe the Sec.134(c)(2)(A) requirement to evaluate gaps in performance for special populations 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.

Such a box would not be out of place. In other areas of the State Plan ICR, OCTAE has included text boxes that contain relevant statutory language that states should be aware of as they are drafting their plans, particularly those provisions are new under Perkins V. For example, text box 2 contains the new Perkins V definition of a CTE concentrator and text box 4 contains the new language on requirements for state determined performance levels (SDPLs).

Career Pathways

Career pathways programs and systems were developed during the early 2000s to increase individual prosperity and regional economic competitiveness through aligned adult education,

community college, human services, and workforce development efforts. Adults with low incomes or low-literacy levels are a target population of the career pathways movement. With the passage of Perkins V, three federal laws now include a shared definition of career pathways: Perkins V, the Workforce Innovation and Opportunity Act (WIOA), and the Higher Education Act (HEA).

Perkins V defines career pathways as “the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).”, which reads: (7) 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...
- (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.

The term ‘career pathways’ is often used as a general term with many different meanings depending on the context. Now that Perkins V has adopted the statutory definition under WIOA, it is important that OCTAE and the CTE community use the term (and more importantly the policy tool) as Congress clearly intended.

On page 14 under 2.c.1. of the draft state plan template reads in part: “...career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) ...”. This language appears to imply that the department would consider career exploration or work-based learning opportunities, on their own, to be career pathways. This is not the case, although certainly either could serve as a critical part of a career pathway. We recommend deleting the incorrect examples between parentheses.

Because Perkins V defines career pathways for the first time, the department should use its authority to educate and provide information to states on career pathways. Perkins V and the draft state plan template regularly mention it in the same context as “programs of study,” either separated by “or” or “and.” While the two have similarities, they are not the same. We recommend OCTAE add the statutory definition of career pathways in the state plan in a text box, because it is

new in Perkins V and because it is included in Perkins V only by reference so many CTE leaders will be unfamiliar with it. In addition, OCTAE should provide guidance and technical assistance on career pathways, especially as related to two important provisions in the draft State Plan Template below, which we strongly support and encourage you to keep in the final plan:

- 2.c.ii. Describe how the eligible agency will “facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;”
- 2.c.v. Describe how the eligible agency will—“coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate”

These provisions will help states move toward alignment between programs of study and career pathways. We believe programs and study and career pathways should be aligned to provide rigorous on-ramps to meaningful postsecondary education and training for both recent high school graduates and adults. Ideally, career pathways and programs of study in the same sector would leverage shared employer partnerships and offer the same labor-market valued credentials most relevant for their local economies. CLASP has deep expertise in career pathways programs, systems, and policies and is willing to advise the department on how to inform states about career pathways and the importance of alignment with programs of study.

Thank you again for the opportunity to provide comments. Please contact me if you have any questions.

Sincerely,

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