



National Alliance for Partnerships in Equity

March 10, 2019

Director of the Information Collection Clearance Division
U.S. Department of Education
550 12th Street SW, PCP, Room 9086
Washington, DC 20202-0023

RE: Carl D. Perkins Career and Technical Education Act State Plan (Docket ID: ED-2018-ICCD-0108-0032)

Dear Kate Mullan,

Thank you for the opportunity to comment on this Information Collection Request (ICR) on the revisions made to the Guide for Submission of State Plans 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 special population students in CTE and STEM programs of study. Through its four lines of business—professional development, technical assistance, research and evaluation, and advocacy—NAPE strives to achieve its mission of building educators' capacity to implement effective solutions for increasing student access, educational equity, and workforce diversity.

We want to thank the Department for considering our initial comments seriously and in some instances using them or some modification of our recommendations in this new version of the Perkins V Guide for the Submission of State Plans OMB Control Number 1830-0029. We especially want to thank the Assistant Secretary, Scott Stump, for modifying his cover letter to include calling out the revisions to the special population's definition and encouraging states to ensure that all students, regardless of background or circumstance, have access to high-quality CTE programs. Also the guidance now includes call out boxes with the statutory language for the State Vision for Education and Workforce Development and Local Needs Assessment sections of the Guide. These additions to the Guide will help highlight critical elements related to equity in CTE that must be addressed in state plans.

However, there are items that we suggested in our previous comments that have not been addressed that we want to reiterate here.

II. Narrative Descriptions

A. Plan Development and Consultation (page 12)

Perkins V adds some new and critical partners as required participants in the State plan consultation process. To ensure that these groups are well represented and not just token additions to the consultation process, NAPE requests that the Department directs States to submit in the State plan a list of organizations, their consultation category, and the method of consultation they represent to ensure that these groups have had adequate voice in the development of the state plan. For example, it is critical that organizations representing all nine groups named in the special populations' definition provide consultation.

B. Program Administration and Implementation

2. Implementing Career and Technical Education Programs and Programs of Study (pages 15-16)

Item f. asks States to include a copy of the local application template with no inclusion of guidance as to what that template must include. NAPE recommends that the Department adds a text box under 2.f. on page 14 that includes the new local application statutory language that can be found in Sec. 134(b) of the law. This is particularly important as the local application requirements for addressing equity in CTE has been strengthened in this law and there have been significant changes made to this section of the law. This will help ensure that States include the nine requirements for the local application in their template.

3. Meeting the Needs of Special Populations (page 16)

NAPE recognizes the Department for including a section in the State plan guidance that specifically addresses the needs of special populations as outlined in Sec. 122(d)(9) of the law. These provisions, in addition to many of the other provisions in the State plan guidance that reference special populations, are an important component of realizing the Department's vision for our nation's CTE system. However, nowhere in the State plan guidance is there a place for States to describe how they will use the three special population set-asides of state leadership funds (Sec. 112(a)(2)). Realizing that the law's description of the State plan contents only requires that assurances be made that these funds will be used it seems appropriate that considering their call out and level of resource investment that the State plans should also describe State's intended use of these funds. There has been a history of a varied level of quality, innovation and accountability for how these funds have been used. NAPE recommends that the Department asks States to describe how these funds will be used to ensure that adequate planning and consideration for how these funds can leverage other State and local activities to support equity in CTE are included in the State planning process. This section of the State plan guidance seems like the logical place to include these questions:

- How will the State use funds to implement career and technical education programs and programs of study for individuals in State institutions, such as (a) corrections institutions; (b) juvenile justice facilities; and (c) educational institutions that serve individuals with disabilities pursuant to section 112(a)(2)(A) of Perkins V?

- How will the State use funds to provide services that prepare individuals for non-traditional fields pursuant to section 112(a)(2)(B) of Perkins V?
- How will the State use funds to provide for the recruitment of special populations to enroll in career and technical education programs pursuant to section 112(a)(2)(C) of Perkins V?

In addition, there is one comment that we would like to add that was not included in our last submission.

IV. Budget

A. Instructions (page 25)

2. Line 6 asks that states indicate “The amount of funds to be made available for the recruitment of special populations to enroll in career and technical education programs pursuant to section 112 (a)(2)(C) of Perkins V. *The percent of funds should equal 0.1 percent of the funds made available by the eligible agency for State leadership activities as noted on Line 3, or \$50,000, whichever is lesser.*” This is an incorrect interpretation of the legislative language and intent. The statute reads:

Sec. 112 (a)(2)(C) an amount shall be made available for the recruitment of special populations to enroll in career and technical education programs, which shall be not less than the lesser of –

- (i) An amount equal to 0.1 percent; or
- (ii) \$50,000; and

Although somewhat confusing due to the multiple uses of the term less or lesser, the statute places a **BASE** of 0.1 percent or \$50,000, whichever is lesser for this purpose. The statute specifically gives States the flexibility to spend more on this purpose if it deems necessary. Line 6 reads as though there is a cap on the expenditure of these funds at 0.1 percent or \$50,000, whichever is less, and must be corrected. We suggest this should read: *The percent of funds should not be less than 0.1 percent or \$50,000, whichever is lesser, of the funds made available by the eligible agency for State leadership activities as noted on Line 3.*

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, and in-demand careers, especially for students from the broader definition of special populations. It is important for the Department to provide structure and guidance that will help the states and the local education agencies they will support to be intentional about being inclusive in their planning, thorough in their equity gap analysis at the state and local level, and intentional in using Perkins funds to address the diverse needs of students, especially those from special populations, in accessing and being successful in high quality CTE programs that lead to meaningful careers with family sustaining wages. Providing the additional information requested above will also give a means to more easily identify effective practices in utilizing the set-asides required in the legislation, which can be replicated in order to increase access, equity, and success for students

underrepresented by gender, race and ethnicity, and special population status, as well as those in state institutions.

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.

Please contact me if you have any questions.

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
National Alliance for Partnerships in Equity
bwilliams@napequity.org