October 28, 2015

The Honorable Michael B. Enzi
Chairman, US Senate HELP Subcommittee on Primary Health and Retirement Security
United States Senate
Washington, D.C. 20510

The Honorable Robert P. Casey
Ranking Member, US Senate HELP Subcommittee on Primary Health and Retirement Security
United States Senate
Washington, D.C. 20510

Re: National Alliance for Partnerships in Equity’s recommendations in response to the Senate HELP Committee Perkins Reauthorization Principles

Dear Chairman Enzi and Senator Casey:

The Carl D. Perkins Act of 2006 is one of the most critical pieces of federal legislation affecting college and career readiness for secondary and community college students nationwide. As the United States continues to compete in the global economy, the development of a highly qualified technical workforce to meet the needs of business is critical. The Perkins Act is currently scheduled for reauthorization and includes important provisions in support of equitable access to high quality career and technical education. On behalf of National Alliance for Partnerships in Equity (NAPE), a national nonprofit organization of more than 35 state education agencies and hundreds of local education agencies implementing CTE programs. NAPE builds educators’ capacity to implement effective solutions for increasing student access, educational equity and workforce diversity.

The Senate Health, Education, Labor and Pensions (HELP) Committee has released its eight principles for reauthorization of the Perkins Act. In response to the Senate HELP Committees request for input NAPE submits the following recommendations and legislative language regarding each of these principles. The recommendations for Perkins reauthorization in this summary seek to simplify the equity language in the Perkins Act and to provide incentives and accountability to close gaps in participation and achievement (equity gaps) between student groups based on gender, race and special population status as compared to all students. These recommendations focus on the concept of closing gaps through: the use of an assessment of participation and performance on the core indicators to inform state and local planning; implementation of programs of study that include using funds to close the identified gaps; reporting results that hold states and locals accountable for closing participation and achievement gaps and providing incentive funding to encourage innovation and best practices for increasing equity in CTE. These recommendations identify provisions that should be retained and modified from current law, as well as new provisions to be added.
Senate HELP Committee Principle #1 - 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;

Access to CTE for all students is critical to ensuring that the US stays competitive in the global economy, to closing the skills gap and to providing access to high skill, high wage occupations that lead to a family sustaining wage. Access however, is more than making CTE available to students. It requires active outreach and recruitment to overcome career bias, stereotypes and the barriers students face entering CTE programs, especially for students typically underserved in CTE, such as students pursuing nontraditional careers, English language learners, students with disabilities, low income students, and single parents. States and locals must be supported and held accountable for closing these participation and achievement gaps. NAPE recommends:

- Continue to require accountability for states and locals to increase the participation and completion of students in programs nontraditional for their gender, including women and girls in STEM related programs of study.
- Build into the accountability system the requirement that states and locals conduct a gap analysis of the core indicators of performance to determine where to focus program improvement activities to close achievement and participation gaps of student groups based on race, gender and special population status as compared to all students.
- Require states and locals to include in their state and local plans the results of their gap analysis and needs assessment and how state administration and leadership funds and local funds will be used to provide technical assistance, professional development and incentive funding to close identified gaps.
- Require states to provide technical assistance and professional development to locals to assist them in conducting annual participation and achievement gap analysis and needs assessment and develop effective policies, practices and programs to close the identified gaps.
- When states or locals are not able to show a closing of their annual reported gaps in participation or achievement over three years, require that at least 25% of the federal funds under this grant be used to support activities specifically focused on the persistent gaps and monitored through an annual improvement plan and progress report.
- Define achievement gaps as the difference in performance on the core indicators of performance in career and technical education programs of study of student groups based on gender, race and special population status as compared to all students served by the eligible agency.
- Define participation gaps as the difference in participation in career and technical education programs of study of student groups based on gender, race and special population status as compared to all students served by the eligible agency.

Senate HELP Committee Principle #2- Increase access to, and support of, career counseling for all CTE students;

Career counseling programs, practices and personnel are the gateway to CTE for students seeking to be both college and career ready. When effective, career counseling can be a critical component in student engagement in CTE programs that are chosen based on student interest.
generated from awareness and experience, a clear understanding of labor market information, and wage earning potential. Unbiased career counseling practices have the potential to break down stereotypes about career options and broaden the choices that students have to engage in a lifelong fulfilling career. Counselors play a critical role in encouraging and/or discouraging students to access CTE programs and careers. Professional development for career counselors on the elimination of career stereotyping and encouraging students to pursue careers regardless of gender stereotypes, such as women in STEM fields, must be explicitly supported in the Perkins Act.

NAPE Recommends:

- Include career counseling as a required use of funds and ensure that counseling practices and introductory courses or activities support the exploration of nontraditional careers for all students
- Support professional development for counselors, in addition to teachers, on the implementation of career counseling practices that help close participation gaps of underserved students in CTE programs and increases the participation of students in nontraditional fields, such as women in STEM careers.
- Include in the definition of high quality career and technical education programs of study as those which include career guidance that assists students in exploring nontraditional career options and making informed career choices based on labor market information.

**Senate HELP Committee Principle #3 - Maintain CTE as a formula program**

NAPE supports maintaining CTE as a formula program to ensure widespread influence of the principles outlined in the Perkins Act on all CTE programs across the nation. Increasing access to high quality CTE programs can only be accomplished by using federal legislation to leverage state and local funding to invest in CTE programs that are accountable to States for closing participation and achievement gaps. Continuing to maintain CTE as a program accessible to all students, not just those in schools successful in winning competitive grant programs, is imperative if we are to prepare every student to be college and career ready.

NAPE recommends:

- Maintain the current allocation and funding formula for the basic state grant.
- Change the current reserve fund from the basic state grant and allow states the flexibility to use it to incentivize local participation and achievement gap closing activities.
- Require states to reserve at least $100,000 of state leadership funds to provide state level professional development and technical assistance to expand student career options by helping LEAs increase the participation and completion of students in nontraditional CTE programs.

**Senate HELP Committee Principle #4 Align with ESEA and WIOA (where applicable) to improve the efficiency and effectiveness of the education and workforce development programs**

CTE programs offered at secondary institutions that serve adults and community colleges are most likely to be the WIOA partner that offers access to job training, basic skills attainment, GED completion and workplace skills development. In addition, CTE completers have higher
scores on state academic assessments and higher graduation rates under ESEA accountability, often attributed to the rigor and relevance of programs that integrate academic content with career development. Both WIOA and ESEA support programs that close participation and achievement gaps in academic achievement and workforce participation. The Perkins Act must continue to align with the principles in ESEA and WIOA that create opportunities for individuals, regardless of demographics, to be successful in school and work. This means continuing to explicitly fund support services for special population students and to hold states and locals accountable for their success in CTE. CTE can also contribute to diversifying the workforce, a critical business strategy, through student career exploration and by providing students with the opportunity to pursue careers regardless of their gender, race or other demographic characteristic.

NAPE Recommends:
- Include in the definition of high quality career and technical education programs of study as those which provide student support services that lead to closing gaps in participation and performance.
- Include state and local Title IX Coordinators as individuals required to participate in the development of state and local CTE plans
- Retain the current definitions for special populations and nontraditional fields.
- Modify the current definition for support services to include supportive services included in report language from the current Perkins Act, such as: transportation, child care, dependent care, tuition, books, and supplies and other services necessary to enable an individual to participate in career and technical education activities.
- Define self-sufficiency or family sustaining wages as those wages which enable households to meet the local costs of their basic needs and build sufficient savings for the future.
- Maintain the accountability measure for increasing the participation and completion of students pursuing nontraditional fields
- Require that all data be reported disaggregated by gender, race and each of the special population groups.

Senate HELP Committee Principle #5 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

Public/Private collaborations with secondary and postsecondary programs that are focused on in-demand industry sectors can help leverage both financial and human resources and provide a clearer pathway for students to college and career success. These partnerships can provide students with role models/mentors and work-based experiences that will broaden their career options in nontraditional fields. Aligned with private sector business diversity initiatives these kinds of collaborations can provide the incentive for secondary and post-secondary programs to close participation and achievement gaps for students typically underrepresented in the targeted in-demand industries and occupations.

NAPE recommends:
- Provide incentives that expand partnerships with business and industry that support the development of innovative programs targeted to meet private sector business diversity
initiatives and close the current workforce participation gender gaps, especially in high tech STEM fields.

Senate HELP Committee Principle #6- Support efforts to integrate into and strengthen career pathways at the state and local levels;

According to the Alliance for Quality Career Pathways, a career pathway is a well-articulated sequence of quality education and training offerings and supportive services that enable educationally underprepared youth and adults to advance over time to successively higher levels of education and employment in a given industry sector or occupation. Imperative to this definition and its implementation in the Perkins Act is the inclusion of supportive services to support the success of underprepared students.

NAPE recommends:
- Require locals to use funds to implement career pathways or programs of study that lead to economic self-sufficiency, provide student support services and educator professional development to close participation and achievement gaps.

Senate HELP Committee Principle #7- Address unfunded programs;

Title II has not been funded in the Perkins Act for many years providing an opportunity in the reauthorization process to create a CTE innovation fund over and above the Basic State Grant program. This fund could provide incentives to state and local education agencies to increase CTE student participation and performance on the core indicators, while reducing gaps between student groups based on race, gender and special population status. This innovation fund should address business driven innovations, such as: increasing the diversity of the workforce; engaging women in STEM fields; increasing the participation of low-income students and single parents/displaced homemakers in CTE programs in career fields that lead to family sustaining wages; and increasing the placement of students with disabilities in unsubsidized employment.

If the Committee choses to not reauthorize the current Perkins Act Title II Tech Prep NAPE Recommends:
- Create a Title II – CTE Innovation Fund that includes priorities for
  - closing participation and achievement gaps of students based on gender, race and special population status and all students served by the eligible agency.
  - Increasing the participation and completion of students in nontraditional CTE programs, including women in STEM related programs of study.

Senate HELP Committee Principle #8- Improve evaluation and research to support innovation and best practices.

The current Perkins Act’s national programs section needs to include explicit direction that research must be conducted on effective practices for implementing CTE programs that have shown to close participation and achievement gaps for students based on gender, race and special population status and all students in CTE. For example, since the accountability measures to increase the participation and completion of students in nontraditional CTE programs was included in the Perkins Act in 1998, the National Research Center on CTE has
never conducted any research on this topic nor has any research data been disaggregated by gender, race or special population. This lack of attention to equity in the CTE research has continued to marginalize these student populations and make it more difficult for educators to implement effective programs that meet the needs of the growing diversity of students seeking access to CTE programs. The reauthorization must recognize this dearth in the research knowledge and remedy the situation by requiring that research on gender equity, race equity and special population access in CTE be conducted to inform best practices and high quality CTE program development.

NAPE Recommends:

- Require that both the National Research Center for Career and Technical Education and the National Assessment of Career and Technical Education includes studies and analysis of effective strategies for closing equity gaps in CTE, especially for women and girls in nontraditional and STEM related programs of study.

NAPE thanks the Senate HELP Committee for the opportunity to submit these comments, recommendations and suggested language for the Committee’s consideration as it moves to reauthorize the Carl D. Perkins Career and Technical Education Act of 2006. We look forward to working with you throughout this process and are prepared to be a resource for you regarding equity in CTE and how the legislation can support increasing access and success for underrepresented students in high quality CTE programs.

Sincerely,

Mimi Lufkin
Chief Executive Officer