July 23, 2014

The Honorable Tom Harkin
Chairman
Committee on Health, Education, Labor & Pensions
United States Senate
Washington, D.C. 20510

The Honorable Lamar Alexander
Ranking Member
Committee on Health, Education, Labor & Pensions
United States Senate
Washington, D.C. 20510

The Honorable John Kline
Chairman
Committee on Education and the Workforce
U.S. House of Representatives
Washington, DC 20515

The Honorable George Miller
Ranking Member
Committee on Education and the Workforce
U.S. House of Representatives
Washington, DC 20515

Re: National Coalition for Women and Girls in Education recommendations for Perkins reauthorization.

Dear Chairman Harkin, Senator Alexander, Chairman Kline and Representative Miller:

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 quality career and technical education. On behalf of the National Coalition for Women and Girls Education (NCWGE), a national nonprofit organization of more than 50 groups dedicated to improving educational opportunities for girls and women, we urge you to consider our recommendations for reauthorization language of the Perkins Act.

The recommendations for Perkins reauthorization language in this summary seek to simplify the equity language in the Perkins Act and to provide incentives and accountability to close equity gaps in program participation, completion, achievement and transition in career and technical education (CTE) programs of study. These recommendations focus on the concept of closing equity 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; and reporting results that hold states and locals accountable for closing equity gaps. These recommendations identify provisions that should be
retained and modified from current law, as well as new provisions to be added. In summary, the recommendations include:

**Purpose**
- Include the goal of career development that leads to economic self-sufficiency or family sustaining wages.

**Definitions**
- Define equity gaps as gaps in participation and performance on the core indicators of performance in career and technical education programs of study between student groups based on gender, race and special population status as compared to all students served by the eligible agency.
- 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 equity gaps in participation and performance and include guidance and advisement that assists students in exploring nontraditional career options and making informed career choices based on labor market information.
- 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 Perkins IV 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.

**Within State Allocation**
- Change the current reserve fund from the basic state grant and allow states the flexibility to use it to incentivize local equity 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 help LEAs close equity gaps.

**Accountability**
- 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 an equity gap analysis of the core indicators of performance to determine where and with whom to focus program improvement activities to close performance and participation gaps.
- When states or locals are not able to show a closing of their annual reported equity gaps in participation or performance 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 equity gap and monitored through an annual improvement plan and progress report.

State and Local Reporting
- Require that all data be reported disaggregated by gender, race and each of the special population groups.
- Require states and locals to report on their equity gap analysis and how funds have been used to improve programs and close equity gaps.

National Activities
- 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.

State Administration, Planning and Leadership
- Require states to conduct an annual equity gap assessment of the state accountability performance on each of the core indicators of improvement.
- Require states to include in their state plan the results of their equity gap assessment and how state administration and leadership funds will be used to provide technical assistance, professional development and incentive funding to close identified equity gaps.
- Require states to provide technical assistance and professional development to locals to assist them in conducting annual equity gap assessments and develop effective policies, practices and programs to close the identified gaps.

Local Plan
- Require locals to conduct an annual equity gap assessment of student participation and performance on each of the core indicators of improvement.
- Require locals to include in their local plans the results of their equity gap assessment and how local funds will be used to provide professional development and programs to close identified equity gaps.
- Include in the elements that define high quality implementation of career and technical education programs of study, activities and support services that close equity gaps in participation and on the core indicators of performance.

State and Local Uses of Funds
- Require states to use state leadership funds to provide technical assistance and professional development to local education agencies to assist them in implementing effective programs for closing equity gaps.
- Require locals to use funds to implement programs of study that lead to economic self-sufficiency, provide student support services and educator professional development to close equity gaps.
Thank you for your consideration of these recommendations and we encourage you to include them in the reauthorization of the Perkins Act.

Sincerely,

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cc: Members of the Senate Committee on Health, Education, Labor & Pensions  
Members of the House Education and the Workforce Committee