Equity and the Perkins V Comprehensive Local Needs Assessment

INTRODUCTION

The Perkins V legislation, Strengthening Career and Technical Education for the 21st Century Act, provides states and local education agencies (LEAs) with a critical framework to center equity within Career and Technical Education (CTE) - the Comprehensive Local Needs Assessment (CLNA or needs assessment). The CLNA is an important advancement that can yield significant positive outcomes for communities, particularly marginalized communities.

This document addresses the CLNA and extends the detailed guidance previously provided by NAPE and our partners at Advance CTE and ACTE. The needs assessment process is the primary lever within Perkins V for educators to highlight factors limiting the success of marginalized communities and underrepresented student groups in CTE. The law requires that the results of the CLNA be included in the four-year Perkins V local application submitted to the state.

It is critical to apply an equity lens guided by three equity principles to achieve greater gains in addressing and closing equity gaps in programs of study leading to high-skill, high-wage, in-demand careers with family-sustaining wages. The needs assessment enacted as a step-by-step process will be insufficient to yield meaningful and transformative change.

We provide three guiding principles to frame the needs assessment: 1) an asset orientation, 2) grounded action, and 3) systems are not neutral. To some readers these principles may be intuitive and highly validating; to others they may be new. While each of us is in a different stage on our journey to apply an equity lens to our work, the desire to do right by our students and the communities we serve is a key starting point. Application of an equity lens can be challenging and messy, yet it is also extremely rewarding as the results can be transformative for educators, students, and their families.

COMPREHENSIVE LOCAL NEEDS ASSESSMENT

The objective of the needs assessment is to provide institutions with a methodology that will ultimately yield interventions meant to drive meaningful progress towards improving the
performance of all CTE students, and specifically addressing equity gaps by gender, race and ethnicity, migrant status, and each demographic in the expanded definition of special populations. The actions determined through the CLNA are included in an institution’s Local Application.

Specific requirements for the needs assessment include:

- A CLNA will be completed every two years.
- Performance of the students served by an institution will be evaluated with respect to State and local adjusted levels of performance established pursuant to Section 113. For special populations this includes:
  - an evaluation of strategies needed to overcome barriers that reduce rates of access to, or performance gaps in, courses and programs;
  - providing programs that are designed to enable them to meet the local levels of performance; and,
  - providing activities to prepare them for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that lead to self-sufficiency.
- Stakeholders to be consulted include: CTE programs at the secondary and postsecondary levels; state board or local workforce development board, a range of local business and industries; special populations; local agencies serving out-of-school youth, homeless children and youth, and at-risk youth; and Indian Tribes and Tribal organizations.

States also provide guidance to LEAs on implementation factors that will frame the needs assessment process.

**EQUITY PRINCIPLES TO FRAME THE CLNA**

If the CLNA is treated only as an exercise or a required step-by-step process that does not recognize the individual-, institutional-, and systems-level barriers for underrepresented and marginalized students in CTE, then it will miss the mark in yielding meaningful change. Local leaders must understand and then apply an equity lens throughout the process to best yield meaningful actions that will address the long-standing disparities within CTE.

The following three principles will significantly change the way the institution, and the educators within, view underserved groups, as well as interventions to address opportunity gaps.
1. Asset Orientation

Developing an equity lens begins with an asset orientation wherein we embrace, cultivate, and leverage the diversity of each individual within an institution. An asset orientation elevates the humanity of the communities being served by your institution by valuing and centering the wealth of knowledge and ability inherent in those groups.

To ensure success of the CLNA, leaders must develop and espouse an asset perspective. Leaders who recognize the capacity within marginalized student groups and communities and who call on educators to value the diversity within their classrooms are transformative in their work.

By using an asset perspective, educators will realize fundamental changes in the assumptions made during the needs assessment process. For example:

*Are the institutional outcomes driving the CLNA a reflection of students’ fundamental capacity, or a marker of the effects of systems within and around the institution acting upon students?*

By understanding the historical role that schools and institutions play in marginalization, we can ensure that educators do not falsely ascribe differential outcomes to the traits of an individual or a community. This substantial shift in how educators understand differential outcomes will lead CLNA teams to consider different questions.

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An asset orientation changes the questions that teams will ask during the needs assessment process, and to whom they will be posed. The discoveries that result from a CLNA informed by an equity lens will change the interventions that are selected.
Reflection Questions:

- What vision for equity is your organization communicating to stakeholders?
- Is an asset or deficit orientation driving educators’ work? Is the goal to fix the students or to fix structural barriers?
- What does it mean for a program to be high quality? Are equitable outcomes a key criterion being used to determine quality? If not, are programs defined as high quality unintentionally perpetuating systemic barriers to access and opportunity for students from marginalized groups?

2. Grounded Action

An equity lens recognizes the depth of knowledge within a community and its individual members. No one is better situated to speak to the problems within CTE and education in general than the very students and families experiencing depressed outcomes. The stories of people who are negatively impacted by current policies and procedures are the best source of data and solutions to improve outcomes.

Education in general, and program improvement models more specifically, have a strong tradition of exclusively employing deductive methodologies. In this tradition, educators rely on conjectures and research-based hypotheses to explain gaps in participation or completion. This reliance on using only reasoned assertions derived from external research and external contexts may lead educators to exclude other factors that potentially have a greater effect on the student. This risk is greatly increased when individuals making the assumptions do not represent the communities they are working with.

A grounded approach to research can complement the deductive methods described above by allowing questions and theories to emerge from the environment where the social or organizational problems exist. Such action research takes a grounded approach and draws from the complexity of the school and from those individuals engaged in that context to develop a truer picture of the issues at hand. This results in actions and interventions that can be more effective in addressing the root causes for disparities in student outcomes.

Grounding data used in the needs assessment that reflects the lived experiences of the students served has important implications for the interventions and activities identified in the local application. For example, the methodologies used and the quality of data collected during the CLNA process can change substantially. Moreover, the imperative to engage marginalized groups can enhance outreach efforts.
Reflection Questions:

- How is your organization elevating the voices of students and families?
- What community groups are faithfully represented on advisory committees within your organization? Which groups are not currently represented and how might you engage them through the stakeholder process?
- Where do you engage stakeholders? Do you go to them rather than expecting them to come to you?
- Are communities engaged from a place of partnership, or only as a source of data?

3. Systems are Not Neutral

The accountability movement within the U.S. and systems-based improvement models often treat educational systems as neutral processors that handle all inputs equally. Both reflect a black-box approach, assuming that the internal workings of an institution are not responsible for the differential outcomes of various student groups. An equity lens shows that institutions are not neutral and that inequitable outcomes strongly predicted by group membership (e.g., ability, race, language) are signs of biased mechanisms. Moreover, the hierarchies inherent within systems create a complex web that results in varying experiences of marginalization dependent upon the overlapping identities of students.

Are all girls realizing the same outcomes within a program, or does race/ethnicity or ability further influence their experience?

Data analyses that purposefully identify the effects of group identification on various measures are an effective means of creating an accurate picture of a complex system. To fully realize this goal, data disaggregation must go beyond single student demographic measures to include the intersections of identity. Perkins V requires that LEAs disaggregate their data to the program level (or the cluster level if program data are not available) by gender, race and ethnicity, each of the nine categories of special populations, and migrant status.

FINAL THOUGHTS

As you explore the equity gaps within your institution, remain aware of how systems create the historical differences that have been the most challenging to address. Do not assume that the problems you’ve uncovered lay with individuals, or that they exist for programmatic

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1 Migrant status is a disaggregation criterion identified in Section 1111(b)(2) of the Elementary and Secondary Education Act of 1965 which was reauthorized as the Every Student Succeeds Act (ESSA), which is referenced in the Perkins V law. This applies with the caveat, “except that such disaggregation shall not be required in the case of a State, local educational agency, or a school in which the number of students in a subgroup is insufficient to yield statistically reliable information or the results would reveal personally identifiable information about an individual student” (Hyslop, A. (2018). Perkins V: The Official Guide to the Strengthening Career and Technical Education for the 21st Century Act. ACTE.).
reasons. An effective anchor is to always ask “What else might be going on?” Set your presumptions aside and enter the discovery process assuming that your knowledge is incomplete or possibly wrong. This stance will reveal possibilities through the needs assessment process that you may not have otherwise considered or seen.

With many years of guiding both states and LEAs on completing an Equity Gap Analysis through our Program Improvement Process for Equity™ (PIPE), NAPE has observed the hallmarks of effective, equity-focused plans that positively influence student access and opportunity. NAPE’s equity principles are designed as guideposts to ensure equity is embedded in your CLNA for your local context.

As you embark on this process, be sure to create spaces for dialogue, discovery, and a focus on continuous improvement. Please share with us your findings and progress. We are here to be partners and advocates for equity alongside you (www.napequity.org; nape@napequity.org).