



Association for Career and Technical Education
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July 5, 2016

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

The Honorable Robert Scott
Ranking Member
Committee on Education and the Workforce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Kline and Ranking Member Scott:

On behalf of the Association for Career and Technical Education (ACTE), the nation's largest not-for-profit organization dedicated to the advancement of education that prepares youth and adults for successful careers, I write to express our support for committee passage of the Strengthening Career and Technical Education for the 21st Century Act, a bill to reauthorize the Carl D. Perkins Career and Technical Education Act. Perkins is the principal source of federal funding for career and technical education (CTE), and is one of the only federal programs that builds the capacity of secondary and postsecondary institutions to offer CTE programs that are academically rigorous and aligned to the needs of business and industry. We want to commend the committee, and the bill's sponsors Representatives Thompson and Clark, for this bipartisan effort that will strengthen the federal investment in CTE.

ACTE has thousands of members from across the country, including career and technical educators, administrators, researchers, guidance counselors and others involved in planning and conducting CTE programs at the secondary, postsecondary and adult levels. It is the belief of our members that the federal investment in CTE should be clearly focused on ensuring all students have access to high-quality programs. Our legislative priorities for the reauthorization of Perkins emphasize the need to concentrate resources on building a strong system of CTE—beginning early in a student's education with career awareness and exploration, and creating pathways through connections among secondary and postsecondary education. It is through this perspective, with the unwavering commitment to the success of our nation's 11 million CTE students, that we respectfully offer the committee the following comments on the proposed legislation.

The cornerstone of the previous reauthorization of Perkins in 2006 was the introduction of the programs of study framework for CTE program delivery. Designed to facilitate the transition from secondary to postsecondary education through non-duplicative sequences of courses culminating in education or work-based credentials, programs of study promote the integration of rigorous academic and CTE content in order to create clear pathways to further education and careers. We have long believed that programs of study must be a central component in the next version of the Perkins, and we are very pleased that the Strengthening Career and Technical Education for the 21st Century Act utilizes this framework throughout. Importantly, the bill formally establishes a definition for programs of study that addresses academic, technical and employability knowledge

and skills, provides for multiple entry and exit points for students, and culminates in the attainment of a recognized postsecondary credential. While the Strengthening Career and Technical Education for the 21st Century Act takes important steps to build on current law and strengthen programs of study, it also maintain the flexibility of states and local recipients to develop and implement the programs of study model that best suits their needs and available resources—another critical priority.

As you are aware, Perkins occupies a unique position in federal policy with connections to both the secondary and postsecondary education systems, as well as workforce development. As such, great care should be taken to appropriately align provisions in Perkins to other education and workforce development laws as a means to reduce duplication, facilitate effective implementation and ensure appropriate coordination of effort. The bill makes important strides toward greater alignment across programs. It utilizes definitions, including “recognized postsecondary credential,” and common performance indicators from the Workforce Innovation and Opportunity Act (WIOA). It also provides opportunities to integrate WIOA sector partnerships and career pathways as part of a CTE program of study, while maintaining local flexibility.

While strengthening the connection to the workforce development system, the bill appropriately maintains Perkins as first and foremost an education program with emphasis on rigorous academics. The bill highlights the role of state-identified academic standards developed under the Every Student Succeeds Act (ESSA), as well as innovative models for providing integrated academic and CTE content. Moreover, we appreciate the committee’s efforts to carefully consider program structure, as well as the targeted populations and institutions, in determining how best to align Perkins with other laws, and we believe that the bill strikes an appropriate balance among all areas concerned.

Another of our key reauthorization priorities was simplification of the Perkins accountability system, helping to minimize the data burden on educational institutions and provide more useful information for program improvement. The bill takes steps to achieve this by eliminating the overly burdensome performance negotiation process, as well as language requiring “continuous improvement,” which created unintended consequences and reduced the ability of states and local entities to focus on areas most in need of improvement. The proposed accountability system also promotes more meaningful measures of CTE student success by formally recognizing CTE concentrator performance as the standard for assessing program effectiveness. While we do have technical concerns related to the interplay between the concentrator definition and the performance system that we will continue to work with the committee to resolve, this is an extremely important movement toward more nationally consistent data.

The streamlined performance measures included in this Act are also a step forward, emphasizing credential attainment and overall CTE program outcomes, while making great strides toward improving and incentivizing connections between secondary and postsecondary education and workforce data systems. However, we continue to have some concerns about indicators that are not the strongest measures of CTE program quality, such as the academic performance indicator utilized in ESSA. While the CTE community is committed to promoting rigorous academics as part of a high-quality CTE program of study, the academic assessments that states use to measure student

performance for this indicator are often administered before students reach CTE concentrator status. For this reason, CTE programs have limited ability to influence student performance on this measure. We continue to believe that including this indicator as part of the Perkins accountability system will not serve as an accurate gauge of CTE program outcomes.

To support a strong system of CTE nationwide, we believe it is essential that Perkins remain primarily a formula grant designed to support all CTE programs that are willing to make a commitment to high levels of quality and continuous program improvement. The Strengthening Career and Technical Education for the 21st Century Act appropriately maintains the Basic State Grant's federal-to-state and state-to-local formulas. While partnerships with nonprofit organizations, the private sector and other stakeholders should be encouraged, we support maintaining individual school districts and postsecondary institutions as eligible recipients of Perkins funds. The continuation of these direct funding streams, along with current options for innovative funding models, such as consortia and the pooling of funds among local recipients, will provide sufficient flexibility for state and local implementation of high-quality CTE programs going forward.

Despite the importance of Perkins funding in advancing CTE, the federal investment in Perkins has not kept pace with the demand for high-quality programs. Funding for the Perkins Basic State Grant program is still \$5.4 million below its pre-sequestration level. From FY 2007, which followed the last reauthorization of Perkins, through FY 2016, total Perkins grant funding to states declined by 13 percent—nearly \$170 million less in funding to support CTE. The Strengthening Career and Technical Education for the 21st Century Act authorizes Congress to appropriate approximately \$1.133 billion in funding for the Basic State Grant program in the first year that the law takes effect, along with \$7.523 million for CTE National Programs. This represents an increase over currently appropriated levels, with increases for each of the five remaining years of the authorization. While the responsibility will fall on Congress to fulfill this commitment through annual appropriations, we are encouraged by the bill's recognition of the need to build our investment in CTE through Perkins. We are also encouraged by changes to the maintenance-of-effort provision that are included in the committee substitute to increase state flexibility while still requiring states to continue their own robust investment that is critical to the success of CTE programs.

In addition, we believe that Perkins should better target funding to ensure the most beneficial impact on students. Funds should be clearly focused on ensuring programs meet high standards of quality and address areas in need of improvement in order to sustain and enhance student success. The Strengthening Career and Technical Education for the 21st Century Act makes important progress toward streamlining local uses of funds, while continuing funding for critical components of CTE, including career exploration and awareness activities, educator professional development and implementing elements of high-quality CTE programs of study.

The bill also introduces a new local application process, which will simplify the planning process and reduce the administrative burden on local recipients. This new process will include a biennial needs assessment that will examine how CTE programs are serving students and meeting local economic needs, while helping to more closely link planning and future funding decisions, leading to more effective uses of federal funding. A more efficient, streamlined local section for Perkins that helps to guide local recipients in effectively leveraging federal funds to support program and

student success in conjunction with the local needs assessment was also a major priority for our members, and we applaud the committee's work to bring improvements to this area of the law as well.

We believe that Perkins should include a strong focus on partnerships between CTE programs and the community, particularly with business and industry. Such partnerships benefit employers by developing pipelines of qualified workers, while providing students the chance to develop in-demand skills that lead to careers that offer a self-sustaining wage and opportunities for advancement. The bill provides for substantive and ongoing consultation with employers and other local stakeholders, and offers the business community an important role in the development and implementation of CTE programs, including identifying relevant standards, industry-recognized credentials and current technology and equipment used by the field, as well as providing opportunities for work-based learning.

One area of concern in the introduced bill was the diminished role of federal research and dissemination efforts related to improving the practice of CTE. Historically, the national research center funded under the national activities section of the law was able to conduct long-term, scientifically-based research leading to such landmark efforts as the "Math-in-CTE" project, which demonstrated increased student achievement from the integration of academic and CTE content and led to the creation of valuable professional development and teacher resources. In the introduced bill, most of the resources that had been allocated to research were redirected to a competitive innovation fund, which we do not believe is the best use of very limited national activities resources. We appreciate changes that will be made in the committee substitute to help address research needs of the field, and we look forward to working with the committee as the bill moves through the legislative process to ensure the continuation of a robust federal role in research.

In addition to these comments, we would like to associate ourselves with the letter submitted by Advance CTE: State Leaders Connecting Learning to Work, particularly their comments on the importance of the state eligible agency's role in Perkins.

We look forward to serving as a continued resource for the committee as Perkins reauthorization moves forward, and we thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen DeWitt". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stephen DeWitt
Deputy Executive Director
ACTE