

Perkins V



February 12, 2019

PRESENTED BY:

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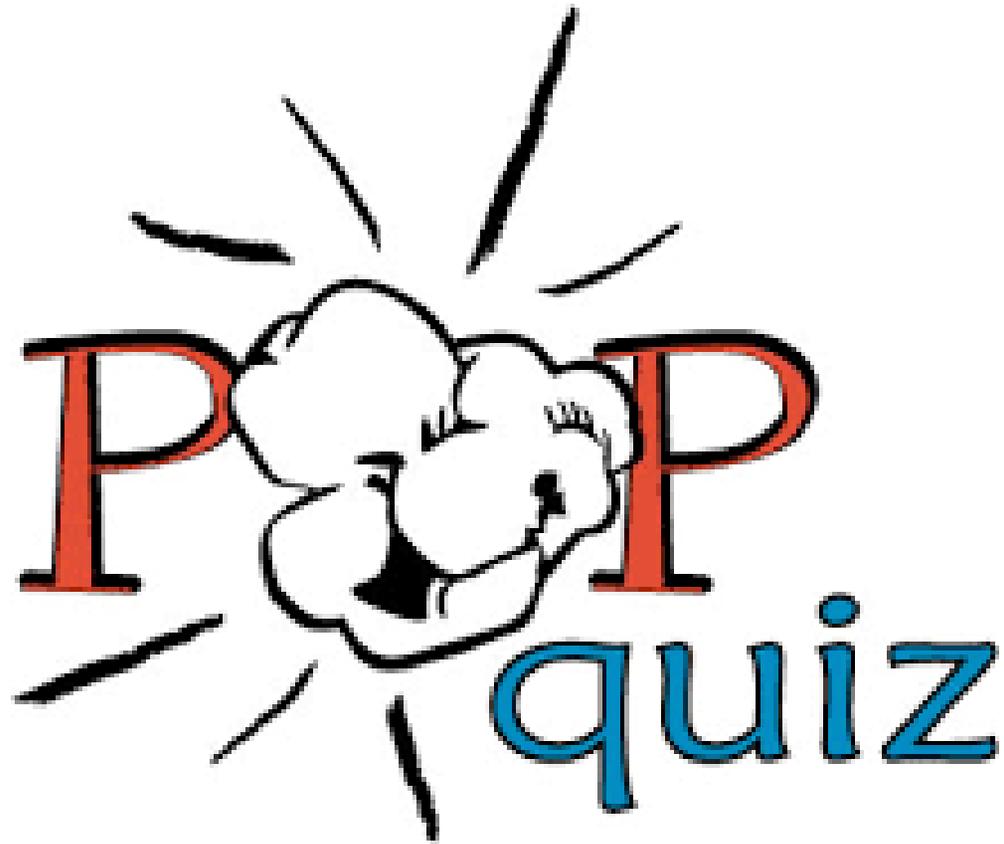
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Overarching Issues

1. Administrators must rely on the text of the statute
2. Importance of compliance
3. Flexibility?
4. States will be the leaders in CTE



1. How many years has the federal government provided support to CTE?

a) 56 years

b) 102 years

c) 39 years

d) 35 years

2. What is the consequence of a LEA or college refusing to participate in Perkins?

a) Nothing

b) Loss of Title I funds

c) Loss of Pell funds

d) A violation of the Civil Rights laws

3. Must federal Perkins V funds be used to improve CTE programs?

a) Yes

b) No

4. How many programs of study must a LEA implement?

a) None

b) One

c) At least two

d) They must invest in only programs of study

5. Must LEAs directly charge the 5% local administrative costs?

- a) All administrative costs must be directly charged
- b) Administrative costs may be charged on a direct or indirect or combination basis
- c) Administrative costs can only be reimbursed on an indirect cost basis

6. May Perkins funds support a cost this year that was paid from nonfederal funds last year?

a) Yes, as long as the cost is necessary for the CTE program

b) No, it would be a supplanting violation

c) If nonfederal funds were ever used to support a cost, federal funds can never be used.

7. May Perkins funds be used to pay membership costs to professional organizations?

- a) Yes, as long as it benefits the CTE program
- b) Perkins funds may not be used for professional development
- c) Yes, as long as the individual is a CTE administrator or instructor
- d) Perkins funds may only be used for institutional membership

8. May Perkins funds be used to pay for the cost of meals at conferences?

- a) Perkins funds may never be used to pay for meals
- b) If a college or LEA is the sponsor/host of the conference, Perkins funds may be used to pay for meals
- c) If a vendor is hosting the conference, Perkins funds paid to the vendor may be used for meals.

9. May Perkins V funds be used to pay for participant costs at CTSO skill competitions?

a) Yes

b) Only if the participants are members of special populations

c) Never

10. May Perkins V funds ever be used to provide direct support to special population students for transportation?

a) Yes

b) No

Perkins Funding Levels

» FY 2017

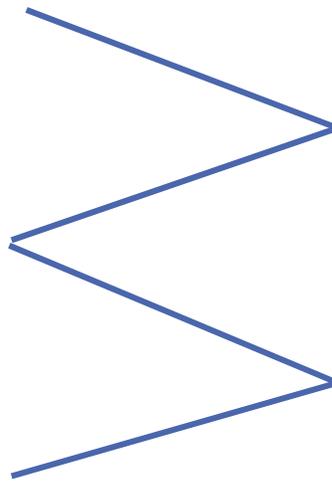
• \$1,125,019,000

» FY 2018

• \$1,200,019,000

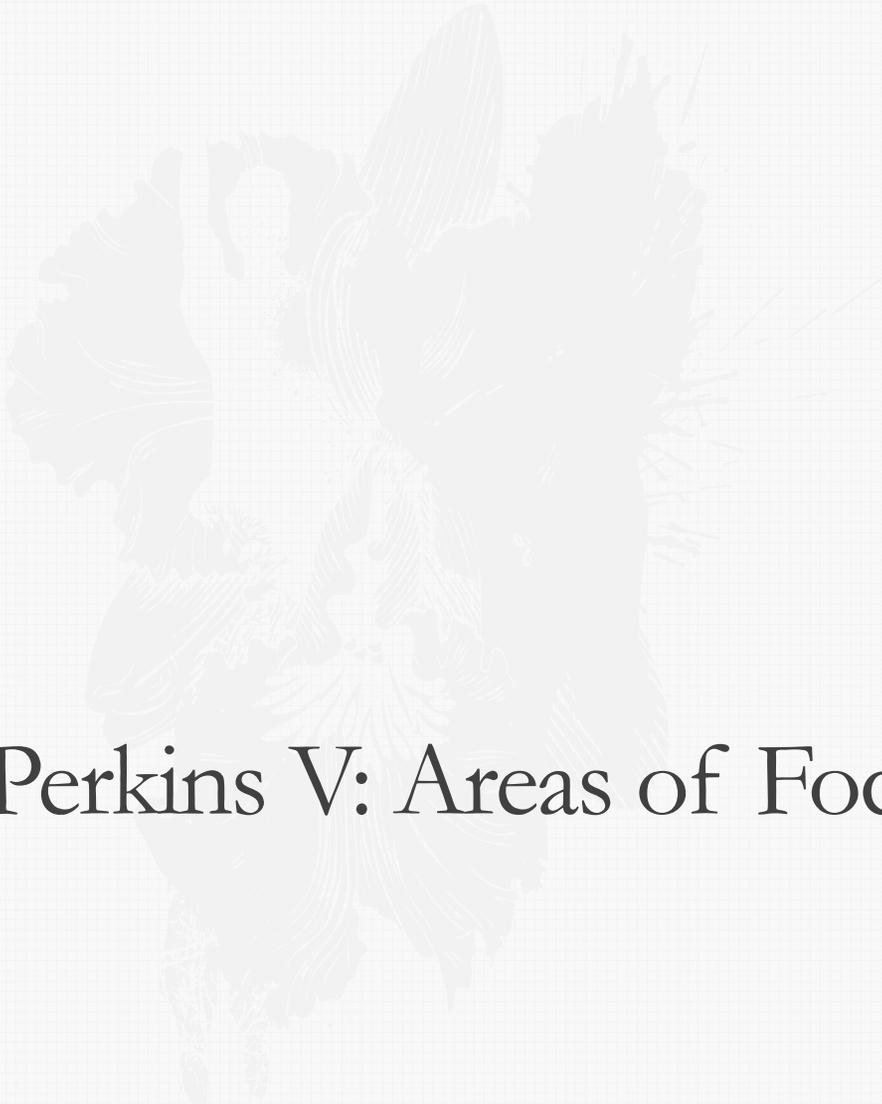
» FY 2019

• \$1,270,019,000



+\$75 million

+\$70 million



Perkins V: Areas of Focus

Allowable Use of Funds

1. How the results of the needs assessment “informed” the selection of CTE programs/activities “to be funded”



Section 134(b)(2)(A)

Most Significant Changes (cont.)

2. Eliminates requirement to “improve” CTE

Now “or improve”

Section 135(a)

3. Accountability

- A. “Concentrator” defined for 1st time
- B. ESSA/WIOA alignment
- C. State Determined Levels – Secretarial Approval?
- D. State Levels – Comparable
- E. Local Levels – Negotiated?
- F. Sanctions – 2 years

4. Special Pops Focus

- A. Reserve for recruitment
- B. Out of work individuals
- C. English learners
- D. Homeless
- E. Foster care
- F. Youth with parent in armed forces



5. MOE

- A. Exclude state competitive or incentive-based programs
- B. Recalculate 5% from 7/1/18 – 6/30/19
- C. Proportionate reduction – 1st time in 55 years
- D. One waiver over 5-year period
- E. Allows for one year MOE reduction

Issues Subject to Interpretation

- » Can State use different “concentrator” definition?
- » Are local levels of performance negotiable?
- » Can pass-through deny funding without due process?
- » Cost of needs assessment – out of 95%?

Senate HELP Committee Report – Perkins V

- » S. Rept. 115-434
- » Issued in December 2018, five months after Perkins V signed into law
 - Long delay unusual for Committee reports
- » Report accompanies Senate legislation (S.3217), not H.R. 2353
 - While the Senate language ultimately became law, H.R. 2353 was the official vehicle of passage for Perkins V
- » **Senate Committee-issued report**, not a conference report

Senate HELP Committee Report

Recognized Post-Secondary Credential

» *HELP Report*. Committee does not intend for use of this term to allow Perkins funds to be used to support attainment of baccalaureate degrees

» BUT

- WIOA definition of “recognized post-secondary credential” includes baccalaureate degree (WIOA Sec. 3(52))
- Perkins V adopts WIOA definition (Perkins V Sec. 3(43))



Senate HELP Committee Report

Special Populations

- » *HELP Report*. eligible agencies/recipients may not serve every special pop, and, to meet reporting reqs, they can simply state they do not serve a special pop

- » Does this cause civil rights concerns?
 - Perkins V Sec. 113: only required to report on special pop students that *are served*
 - If needs assessment demonstrates disparities and gaps in performance for a subset of special pop students, could lead to civil rights concerns

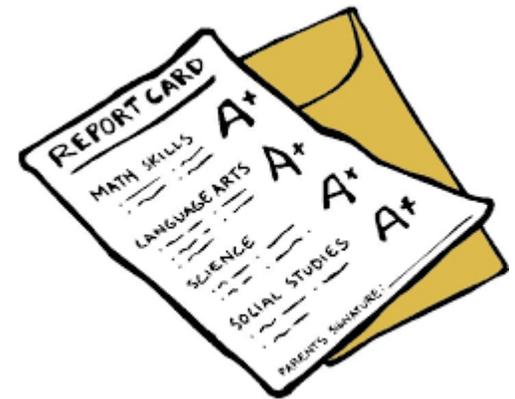
Senate HELP Committee Report

Reports

» *HELP Report*. annual report on performance levels- data must be disaggregated by CTE program or POS “unless impractical.”

» What does “unless impractical” mean?

- Consider defining in 4-year State plan
- Seek prior approval from ED



Senate HELP Committee Report

Improvement Plan

- » *HELP Report*: if eligible agency failed to meet at least 90% of core performance indicator for 2 consecutive years, Secretary may withhold funds. *"This is the same timeline as current practice."*
- » Perkins IV Sec. 123: Secretary may withhold funds if fail to meet at least 90% of level of core performance indicator for 3 consecutive years
- » Perkins V Sec. 123: this happens after 2 consecutive years

Senate HELP Committee Report

Local Uses of Funds

» *HELP Report*. Use of “including” and “such as” throughout bill is not meant to be exhaustive but rather a brief demonstration of examples

» BUT

- All costs still need to relate back to local comprehensive needs assessment
- May be difficult to defend allowability for a use of funds that was not specifically mentioned



Senate HELP Report- Additional Clarifications

- » Reference to “multiple entry and exit points that incorporate credentialing” is intended to allow students to obtain portable and stackable credentials.
- » Eligible agency is only required to choose 1 of the 3 program quality indicators, but may report on all 3.
- » Governor’s signature is not required for transition plan.

Senate HELP Report- Additional Clarifications (cont.)

- » Performance indicator: percentage of CTE concentrators in 2nd quarter after exiting from secondary education requires disaggregation by outcome: PS education, advanced training, military service, Peace Corps volunteers, receive assistance under National Community Service Act or are employed.
 - Treat as single indicator despite different outcome types; disaggregate only in State and local reports
 - Disaggregated data to help learn about student placement upon exit

State Plan/Transition Plan



Sharon Miller – OCTAE

**“No performance data
will be required for
7/1/19 – 6/30/20”**

- 9/12/18

ED Guide for the Submission of State Plans

- » **Option 1** – a 1-Year Transition Plan for FY 2019. Then submit Perkins V State Plan in FY 2020 covering FY 2020-23.
- » **Option 2** – a Perkins V State Plan covers 5 years, including a transition year in FY 2019 and then a 4-year period covering FY 2020-23.

ED Guide for the Submission of State Plans

Option 1 Transition Plan:

- Narrative Descriptions- only certain items in the “Program Administration and Implementation” section are required!
- Only B.2.a-e (pgs. 14-15) and B.3.a (pg. 16)

ED Guide for Submission of State Plans

Option 1- Transition Plan Required Item:

» B.2.a.:

- Describe the CTE programs or programs of study (POS) that will be supported, developed, or improved at the State level
- Include descriptions of the POS to be developed at the State level and made available for adoption by the eligible recipients

ED Guide for Submission of State Plans

Option 1- Transition Plan Required Item:

» B.2.b.:

- Describe process and criteria to be used for approved locally developed POS or career pathways.
- Include how those programs address State workforce development and education needs
- Include the criteria to assess the extent to which the local application (Sec. 132) will:
 - Promote continuous improvement in academic achievement and technical skill attainment
 - Expand access to CTE for special pops
 - Support the inclusion of employability skills in POS and career pathways

ED Guide for Submission of State Plans

Option 1- Transition Plan Required Item:

» B.2.c.:

- Describe how the agency will:
 - Make information on approved POS and career pathways available to students (and parents), reps of secondary and postsecondary education, and special pops and provide that information in a language those individuals can understand
 - Facilitate collaboration among eligible recipients in development and coordination of CTE programs, POS and career pathways that include multiple entry and exit points

ED Guide for Submission of State Plans

Option 1- Transition Plan Required Item:

» B.2.c. (*cont.*):

- Describe how the agency will:
 - Use State, regional, or local labor market data to determine alignment of eligible recipients' POS to the needs of the economy
 - Ensure equal access for special pops
 - Coordinate with State board to support local development of career pathways and articulate career pathways development by local WIBs
 - Support effective and meaningful collaboration between S/PS institutions and employers to provide students experience in all aspects of industry
 - Improve outcomes and reduce performance gaps

ED State Guide for Submission of State Plans

Option 1- Transition Plan Required Item:

» B.2.d.:

- Describe how the eligible agency, if it chooses to do so, will include the opportunity for secondary school students to participate in:
 - Dual or concurrent enrollment programs,
 - Early college high school, or
 - Competency-based education

ED Guide for Submission of State Plans

Option 1- Transition Plan Required Item:

» B.2.e.:

- Describe how the eligible agency will involve the following individuals in the planning, development, implementation, and evaluation of its CTE programs:
 - Parents,
 - Academic and CTE teachers,
 - Local business (including small businesses),
 - Labor organizations, and
 - Reps of Indian Tribes and Tribal organizations (as appropriate)

ED Guide for Submission of State Plans

Option 1- Transition Plan Required Item:

» B.3.a.:

- Describe its program strategies for special pops, including how special pops:
 - Will be provided with equal access
 - Will not be discriminated against on the basis of status as a member of a special pop
 - Will be provided with programs designed to enable special pops to meet or exceed State levels of performance, and prepare special pops for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations

ED Guide for Submission of State Plans

Option 1- Transition Plan Required Item:

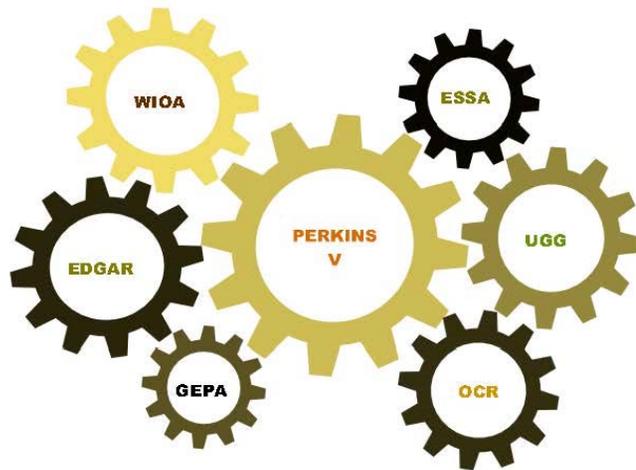
» B.3.a. (*cont.*):

- Describe its program strategies for special pops, including how special pops:
 - Will be provided appropriate accommodations
 - Will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment

Questions??

THE COMPREHENSIVE GUIDE TO THE FEDERAL ROLE IN CAREER & TECHNICAL EDUCATION:

Perkins V and the Uniform Grant Guidance



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