

July 5th, 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 Advance CTE, the national association representing the State Directors of Career Technical Education (CTE), I write to express our support for Committee passage of the *Strengthening Career and Technical Education for the 21st Century Act* (H.R. 5587), legislation that would reauthorize the Carl D. Perkins Career and Technical Education Act (Perkins). Along with the legislation's other co-sponsors, we applaud your leadership and ongoing bipartisan commitment to strengthen Perkins and ensure that the nation's 11 million CTE students are prepared to meet the ever-changing needs of our economy.

Perkins provides federal funding to states and their CTE systems to strengthen their ability to offer high-quality CTE programs at the secondary and postsecondary level and ensure equitable access to such programs. Building upon the decades-long legacy of Perkins, H.R. 5587 goes a long way in supporting the full spectrum of a student's educational needs – beginning with career awareness and exploration all the way to career preparation – while balancing those with the current and future needs of the economy. The aspiration to more effectively support *high-quality* CTE for all learners who choose to participate in these programs has guided our recommendations for Perkins reauthorization. It is with this goal in mind that we respectfully offer the Committee the following comments on the proposed legislation.

The first, and perhaps most critical, step in realizing the goal of supporting high-quality CTE is to define what is meant by the term itself. Our organization has long championed the framework of CTE "programs of study". First introduced by Perkins in 2006, this proven approach to delivering CTE promotes academic and technical content integration and supports connections between secondary and postsecondary education with a non-duplicative sequence of courses that ultimately culminates in a credential of labor market value. We are pleased to note that H.R. 5587 uses this framework throughout much of the legislation, and we especially

applaud the expanded introduction of a formal definition for CTE program of study. While the H.R. 5587 does not limit funding to only supporting CTE programs of study, which was our hope, we support the flexibility afforded state and local CTE leaders to implement this important framework.

One of the most important aspects of Perkins is that it sits at the critical intersection of secondary and postsecondary education as well as the workforce development system. The state CTE leaders we represent often have a broad portfolio of responsibilities, and are keenly aware of the need to align Perkins and other education and workforce development legislation, such as the recently passed Every Student Succeeds Act (ESSA) and the Workforce Innovation and Opportunity Act (WIOA). We applaud the goals of such alignment to reduce state administrative burden and facilitate effective and efficient implementation of these programs through a cohesive state vision of education and workforce development to ensure that students and consumers of the system are best served.

While a relatively small program by comparison, Perkins acts as a “bridge builder” between these laws. H.R. 5587 strikes an appropriate balance between ESSA and WIOA through the use of common definitions and terminology, alignment of performance indicators, and the streamlining of state reporting requirements. Significantly, we appreciate the bill’s recognition that the educational component of Perkins is integral to high-quality CTE by requiring alignment to rigorous state-identified academic standards and promoting innovative models for integrated academic and technical content. Further, we appreciate the efforts made to recognize that the federal investment in CTE programs should not focus on filling immediate, short-term or low-skill, low-wage job vacancies. Instead, H.R. 5587 emphasizes student attainment of skills and knowledge that lead to high-skill careers that result in self-sustaining wages and ensures that longer-term talent pipeline needs are met.

Related to the improvements noted above are H.R. 5587’s changes to the current Perkins accountability framework. We note that the bill makes an effort to improve upon a flawed federal-to-state performance negotiation process, particularly the removal of the burdensome language “continuous improvement,” which resulted in setting of arbitrary performance targets not linked to actual prior performance or student characteristics.

Many of the new accountability measures contained in this proposal are indicative of CTE student success such as credential attainment, graduation rates and placement. We are encouraged by the legislation’s increased focus on important student outcomes such as these. However, we remain concerned about the retained secondary academic measure. Often these academic assessments are given before a student ever steps foot into a CTE classroom. Therefore, this measure should actually be considered a “pre-” CTE intervention measure rather than considered an impact or outcome measure. Further, while we appreciate H.R. 5587’s streamlined approach to the existing “non-traditional” measure, we remain skeptical of this measure’s overall utility, and remain concerned about the ability of states and local grant recipients to make meaningful improvement on this indicator in the short or long term.

Related to the improvements made to most of Perkins' existing performance measures, we are encouraged by the introduction of a formal CTE concentrator definition as the primary unit of analysis for this accountability system. This change should improve the reliability of data collected under this program. While we do have some remaining technical concerns related to the relationship of this definition and some of the proposed indicators, we remain hopeful that this important step will lead to more nationally consistent data and reporting.

Our membership is extremely supportive of H.R. 5587's retention of the existing governance structure, which acknowledges the importance of a state-identified Perkins eligible agency and that agency's autonomy to make programmatic and planning decisions. We are encouraged by the increase in the state's allowable "reserve fund," which holds great possibility for spurring innovation.

We also strongly commend the legislation's continuation of state administration and state leadership funding set-asides, which will ensure appropriate oversight and strong state leadership during implementation. We are hopeful for a clarification that this bill will authorize states and locals a one-year transition period, followed by a five-year state plan. This would ensure state planning is in line with the proposed authorization period.

We also applaud H.R. 5587's continuation of Perkins as a formula grant program providing foundational support to state CTE systems. Relatedly, we strongly endorse the bill's maintenance of federal-to-state and state-to-local formulas as well as the continuation of school districts, area technical centers and postsecondary institutions as the primary eligible recipients of Perkins funds. We also support the legislation's strides to encourage, but not to require, innovative state and local funding approaches such as consortia models and the option to pool funds among local recipients. Our organization is extremely encouraged with the bill's improvements to the current "Maintenance of Effort" requirement and the related changes in the Committee's substitute which will increase state flexibility while still ensuring states continue their own strong commitment to CTE. We applaud the recommended authorization levels for the basic state grant program. While we would have liked these levels to have been even greater than what is recommended and know that ultimately be incumbent on Congress to fulfill the suggested annual increases outlined in this proposal, we are encouraged by the recognition for the need to invest further.

We are strongly encouraged by the significant changes made in the local provisions of this legislation, which will more effectively direct federal resources to areas that will have the highest impact through the introduction of a local needs assessment. We would direct your attention on this matter to the comments submitted by the Association of Career and Technical Education (ACTE), of which we fully support and endorse.

Finally, a remaining area of concern relates to the national activities section of this bill. In an effort to continue to improve CTE and ensure that it is meeting the needs of all students, our

organization supports a stronger degree of support for research and thoughtful evaluation than is contained in this proposal. We note that the majority of resources contained in this section appear to be allocated for a competitive innovation fund, which we do not believe is the best use of extremely limited and important research funding. We hope to work with the Committee in the future through the legislative process to ensure that CTE research is more fully supported moving forward.

We thank you for your consideration of these comments and for your leadership. We have sincerely appreciated the committee staff's collaboration with our organization and others who directly represent CTE leaders and administrators to ensure the legislation aligns to the priorities of the field and will help advance CTE. We remain committed to working together to ensure this legislation will increase access to and support of high-quality CTE that meets the needs of our nation's economy. We look forward to working with you and your colleagues as Perkins reauthorization continues to take shape.

Sincerely,

A handwritten signature in cursive script that reads "Kimberly A. Green".

Kimberly Green  
Executive Director  
Advance CTE