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July 5, 2016

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

Honorable Bobby 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 AASA, The School Superintendents Association, representing 13,000 school system leaders throughout the country, I am writing to offer our views on the *Strengthening Career and Technical Education (CTE) for the 21st Century Act*. We applaud the committee for its work to improve on the Carl D. Perkins Career and Technical Education Act in a bipartisan manner.

There is much to like in the *Strengthening Career and Technical Education for the 21st Century Act* and we are grateful that many of the priorities AASA pushed to have addressed were incorporated in this reauthorization. Chief among them is the major complaint by school leaders about the onerous and disproportionate administrative requirements for Perkins funding, particularly given the low levels of federal funding for Perkins. The House bill addresses the paperwork burden by allowing districts to fill out a simple, easy-to-complete local application. This is a radical departure from current law and will ensure that no district turns down Perkins funding because the associated paperwork does not justify the award amount.

AASA knows every district with high-quality CTE programs is continuously engaging with both higher education and business/industry partners to confirm program quality. We are so pleased to see that as part of the development of a local plan, districts would conduct a biennial needs assessment that provides business/industry and higher education partners, as well as other key stakeholders, an opportunity to provide input into the local plan to ensure the district is directing its limited resources towards relevant, well-aligned programs of study. In addition, the bill ensures districts have access to, and take into consideration, critical labor market information that will detail current, intermediate, or long-term labor market projections when determining whether to maintain, develop or eliminate programs of study.

The legislation also streamlines the accountability system in Perkins and aligns performance measures with those set by each state under ESSA. Districts must report on CTE graduation rates, post-secondary outcomes, and academic proficiency, but States have the discretion to choose another factor, such as the attainment rate of an industry recognized credential, the rate of dual-enrollment or the rate of students participating in work-based learning, that they can use as a fourth indicator. This flexibility means that States can use a metric that prioritizes their state policy and state investments in CTE and aligns with what they may already require districts to track and report.

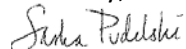
We are incredibly pleased to see the elimination of the requirement that districts and states demonstrate “continuous improvement” in their CTE programs. The idea that district CTE programs can continually improve regardless of economic circumstances, demographic shifts, and federal and state funding dynamics is preposterous. Whether a district was a high-flyer or a lower-performer, this metric led to unintended consequences at the local level. We are thrilled to see that this requirement was eliminated and that districts can focus their efforts on meaningful program quality enhancements rather than hitting new performance targets every year.

While we appreciate the improvements to the accountability system, we are disappointed that the non-traditional measure remains a performance indicator at the LEA level. Eliminating this indicator was a key priority for AASA in the reauthorization. AASA also advocated for CTE programs to be evaluated based on the performance of students who take a series of CTE coursework in the same program of study, rather than those students who participate in CTE in a less structured way to explore various career options. We are very happy to see that the Committee has crafted an accountability system focused on the performance of those students who are considered to be “CTE concentrators” and creates a national definition of concentrator that will allow CTE performance data to be more comparable across states. However, AASA believes the definition must be strengthened to avoid confusion in evaluating the performance of a CTE program, and hopes the Committee amends this important definition quickly.

AASA remains vigilantly opposed to federal legislation that would enhance or maintain the role of the Secretary in determining or adjusting State developed accountability systems. The strong prohibitions that are added to the bill will prevent the Secretary from much overreach, and AASA is committed to working with the Committee to strengthen the limitations placed on the Secretary. Of importance to school leaders is that the bill repeals the requirement in current law that States must negotiate their targeted levels of performance with the Secretary, which frees States to set more reasonable targets for accountability. It also requires that when the State sets new performance targets that it discusses the proposed targets with school superintendents, teachers, workforce development boards and other key stakeholders. The House bill also prevents the Secretary from withholding funds from a State that does not meet certain performance targets and empowers state leaders to develop an improvement plan that makes sense to them. Even more importantly, at the local level, LEA improvement plans are developed by the LEA with limited input from state leaders, and state leaders are discouraged from requiring districts to redirect limited resources towards improving specific indicators.

On the whole, AASA is pleased with how the bill addresses many of our key priorities within the reauthorization. We hope the Committee considers our concerns above and we stand willing to work with members of the House to ensure the reauthorization moves forward. We also urge appropriators to consider funding levels for Perkins as they examine the reauthorization of this legislation since policy improvements cannot be fully realized without adequate funding levels.

Sincerely,



Sasha Pudelski  
Assistant Director, Policy & Advocacy