



PERKINS V REAUTHORIZATION

Opportunities, Challenges and Risks for States

ExcelinEd Policy Toolkit - 2018

With Great Flexibility Comes Great Opportunity (And Great Responsibility)

In July 2018, President Trump signed into law the “[Strengthening Career and Technical Education \(CTE\) for the 21st Century Act](#)” (*Perkins V*), reauthorizing the Carl D. Perkins Career and Technical Education Act of 2006 (*Perkins IV*). *Perkins V* moved through the legislative process with overwhelming bipartisan support. This support was in large part because the law is foundational to ensuring alignment between our K-12 systems, postsecondary institutions and the workforce. Much has changed since the last reauthorization, and it is long overdue. The students who were in kindergarten the last time Perkins was updated are now seniors in high school. As these students have grown and matured, so have the labor market demands and expectations for postsecondary credentialing. There is increased local and national attention on the skills gap and the number of unfilled jobs requiring specific knowledge, skills and credentials. Our educational system’s ability to prepare students for success in life plays a critical role in the growth of state and local economies.

Changes to *Perkins V* follow recent trends in related federal legislation—the [Every Student Succeeds Act](#) (ESSA) and the [Workforce Innovation and Opportunity Act](#) (WIOA)—by providing more flexibility to states in developing and implementing their CTE programs. In addition, *Perkins V* places greater emphasis developing clear connections between programs and labor market demands *and* expands accountability subgroups to include services to historically underrepresented populations. As with any law that increases flexibility, *Perkins V* provides states with the opportunity to develop a creative, strategic vision for CTE that fits their state’s unique needs. It also presents the challenge of developing guardrails that ensure all activities and spending related to CTE support the state’s strategic vision for CTE. Thus, **states must approach their state plans and local applications with a laser focus that is grounded in quality, alignment and industry needs.**

It’s important to note that—while *Perkins V* allocates funds to states to support CTE—state and local funding sources play a critical role in sustaining and expanding high-quality career pathways at the secondary and postsecondary levels. However, Perkins has historically driven CTE policies, practices and outcomes in states, and it will likely continue to do so. States must ensure all funding sources supporting CTE are coordinated to achieve their vision for a high-quality CTE program that prepares students for in-demand careers.

OPPORTUNITIES, CHALLENGES AND RISKS FOR STATES

As state policymakers consider how their state will approach *Perkins V*, they should consider the following opportunities, challenges and risks of some of the major changes to the law. While this brief’s content does not constitute an exhaustive list of changes found in *Perkins V*, it does highlight eight shifts that present critical decision points for states in ensuring their CTE systems are high-quality, efficient and aligned with industry demands. These decision points fall across three large buckets:

- Program planning
- Program funding
- Program impact and accountability

In each of these areas, states have the opportunity to leverage the flexibility of *Perkins V* to improve and expand their CTE systems and, ultimately, ensure all students are prepared for postsecondary education and continued career advancement.



PROGRAM PLANNING

1. States are encouraged to invest in early postsecondary opportunities.

Perkins V emphasizes the importance of secondary-postsecondary coordination and alignment throughout the text of the law. Early postsecondary opportunities, broadly defined, provide students with the opportunity to earn postsecondary credit or advanced postsecondary standing while in high school. They are designed to help students seamlessly transition between secondary and postsecondary, and could reduce the time and cost required to complete the postsecondary credentials (including industry certifications) valued in today's labor market.

Early postsecondary opportunities are encouraged in nearly every aspect of *Perkins V*, using a variety of terms (listed to the right). The U.S. Department of Education, states and local recipients are required to evaluate and report on the extent to which early postsecondary opportunities are available and effective within their systems. Additionally, one of the possible secondary core indicators of program quality is based on the percentage of CTE concentrators—students completing two or more courses in a CTE program—who leave high school with postsecondary credit.

Changes to allowable uses of state leadership funding expand states' abilities to invest in the development and expansion of early postsecondary opportunities as part of CTE programs of study. Similarly, the list of required uses of local funds include activities that support the expansion of early postsecondary opportunities, including reducing the costs of such experiences for students who are part of special populations.

Opportunities

ExcelinEd's [CTE Playbook series](#) lists several non-negotiables for high-quality CTE programs. These non-negotiables—including a clear connection to postsecondary credentialing and early postsecondary opportunities—play an integral role in ensuring these connections result in meaningful experiences that can accelerate student preparation for postsecondary and career. States that have a clear, coherent vision for the role that early postsecondary opportunities play in programs of study will be able to leverage the increased emphasis and flexibility related to early postsecondary opportunities under *Perkins V*. States that choose to invest Perkins funds in early postsecondary opportunities as part of career pathways should consider establishing criteria to ensure all early postsecondary opportunities are high-quality and transferrable to postsecondary institutions toward specific major/program requirements.

The inclusion of early postsecondary credit attainment as a secondary program quality indicator creates an incentive for states and districts to rapidly expand access to early postsecondary opportunities to ensure accountability goals are met. There is also an opportunity for many states to align this indicator with their ESSA accountability systems, in which attainment of dual credit hours and postsecondary credentials (among other elements) represent indicators of college and career readiness.

Challenges

States that invest Perkins funds in expanding early postsecondary opportunities without a very clear, coherent strategy risk diminishing returns on the investment. Research has shown that the quality and transferability of early

Early Postsecondary Terms in Perkins V

- Accelerated learning programs
- Articulation agreement
- Credit granted on the basis of performance on technical or academic assessments
- Credit transfer agreement
- Dual or concurrent enrollment
- Dual credit
- Early college high school
- Postsecondary credit attainment in high school
- Recognized postsecondary credential earned in high school
- Transcribed postsecondary credit



postsecondary experiences varies widely. This inconsistency can lead to duplication of coursework or losing tuition/exam fees for non-transferable coursework.

Students who earn credit that does not accelerate them along a program of study, such as a dual credit course, lose valuable time and money that could have been spent on acceleration through advanced coursework. States that do not establish clear criteria for high-quality early postsecondary opportunities risk forgoing opportunities for students to earn meaningful credit and complete their postsecondary credentials ahead of schedule.

2. The state planning process requires more stakeholder collaboration and review.

One of the most notable changes to *Perkins V* is the process for developing and reviewing the Perkins state plan. Under *Perkins IV*, states submitted a six-year state plan, which could then be updated annually. States were required to hold public hearings to facilitate stakeholder engagement, and these recommendations and the state's responses were to be included in the state plan.

Under *Perkins V*, the state plan is valid for four years. States are still required to hold open hearings, though specific stakeholder groups are required to be included. Additionally, states must now make the state plan electronically available for public comment for at least 30 days *and* provide an assurance that public comments were considered in the development of the state plan. Finally, *Perkins V* adds a 30-day window for the state's governor to review and sign the state plan; the plan can be submitted after the 30-day window without the governor's signature.

All revisions to the state plan, including adjustments to performance targets or in response to unanticipated circumstances, must go through the entire public review and approval process. States may choose to submit a transition plan for one year, after this time they will be required to submit a full state plan meeting all requirements of *Perkins V*.

Opportunities

States have the opportunity to embrace the state planning process as a mechanism to cultivate stronger ongoing relationships with their stakeholders. The long list of required participants will help to ensure that the Perkins state plan appropriately reflects the interests of K-12 local systems and specialized schools (area CTE centers, charter schools, etc.), postsecondary education institutions, the state workforce board and agencies that work with business and industry (associations, chambers of commerce and employers), parents, students and various other state stakeholders. States that proactively engage statewide and local partners in their planning process will help to spread awareness about the state's vision and strategies for ensuring all students have access to high-quality career pathways.

States can also coordinate existing planning processes and public meetings or events to streamline the state planning process. Not only will this increase efficiency, it also provides the opportunity to make explicit connections between existing initiatives and the state's vision and strategies for CTE. This increased collaboration could pay dividends in spurring local and regional partnerships.

Challenges and Risks

The new state planning process may increase the administrative burden on the eligible state agency. States may consider establishing more formal processes to collect feedback. This may help synthesize the information collected through public hearing and comment opportunities to maximize the usefulness of the increased stakeholder engagement.

The expanded stakeholder feedback and review processes may also compress the timelines that states currently use to collect, review and analyze their Perkins data. These data are critical to drive decisions on state-determined levels of performance, improvement plans or state plan revisions. However, in many cases these data are dependent upon other



data sources, such as graduation cohorts or assessment results, and therefore are not available until several months after the end of the school year ends. These pinch points will be felt most acutely during the years when new data elements are being added to data systems and incorporated into the state's Perkins accountability system.

3. Local recipients must complete (and update) new Local Comprehensive Needs Assessments.

Perkins V contains a new requirement within the local recipient application for funds (formerly the local plan). The Local Comprehensive Needs Assessment must be included in each local application and updated at least every two years. *Perkins V* sets forth the following five requirements for the Local Comprehensive Needs Assessment:

- Evaluation of student performance by subgroup on Perkins core indicators.
- Description of the CTE programs offered (size, scope, quality and alignment).
- Evaluation of the progress toward implementing CTE programs and programs of study.
- Description of recruitment, retention and training for CTE educators and support professionals.
- Description of progress toward implementing equal access to CTE for all students.

Local recipients are required to engage several groups of stakeholders in the development of the comprehensive needs assessment and on an ongoing basis to support cross-sector coordination.

Opportunities

While local recipients are responsible for completing the Local Comprehensive Needs Assessment, this new requirement offers several opportunities for states. States are given flexibility to set additional requirements for the contents of the local application, including the Local Comprehensive Needs Assessment. This provides states with the opportunity to customize these requirements to fit their unique contexts and visions for high-quality CTE programs. For example, states may consider setting guidelines for consistent data definitions when analyzing labor market and wage data to ensure CTE programs are aligned with in-demand fields or are requiring local recipients to set goals and measure progress toward benchmarks state-specific initiatives (such as a statewide postsecondary completion rate goals). States can also meaningfully integrate this ongoing evaluation with other local, regional and state strategic planning processes. This coordination could reduce possible duplication of effort within regions and districts.

The Local Comprehensive Needs Assessment also provides states with the opportunity to develop processes to share student outcome and workforce data with local recipients. States that provide consistent data to local recipients could increase the local efficiency of data collection and analysis *and* encourage outcomes-based program decision-making. States that choose to synthesize and provide data from multiple agencies to local recipients as part of this process may increase long-term efficiencies and alignment.

Finally, states have the option to require the inclusion of data beyond that required by *Perkins V*. Including other measures of student achievement and outcomes would allow the local needs assessment to address all issues related to college and career readiness. Additionally, it would leverage the stakeholder engagement requirements of the law to ensure that local and regional partners are informed and included in progress toward meeting their local and statewide goals.

Challenges and Risks

While this new requirement seeks to engage more stakeholders in the local planning and evaluation process, it also places increased administrative responsibilities on already-stretched local recipients of Perkins funds. States that do not provide additional guidance on how to include relevant data and stakeholders in this process risk creating a situation that results in inconsistent quality of Local Comprehensive Needs Assessments across communities. These Local Comprehensive Needs Assessments may be compliant with Perkins V requirements, but they may not appropriately focus on labor market data and stakeholder engagement to drive student outcomes and align with the



state's overall goals. In other words, this could result in additional local administrative efforts that do not positively impact quality and equity in local CTE programs aligned to priority industry needs.

States also run the risk of foregoing an opportunity to truly align and integrate the comprehensive local needs assessment process into state and local strategic goals. A lack of alignment could result in a reporting system that may duplicate efforts across districts, stakeholders and regions. Additionally, states and local recipients that approach this as a process separate from other required plans risk perpetuating chasms between CTE and general education.

Program Planning Recommendations for States to Consider

- Establish formal stakeholder engagement processes to collect and synthesize feedback on state and local CTE programs, in coordination with existing stakeholder engagement processes where appropriate.
- Create state-specific requirements for the local application and local comprehensive needs assessment to ensure consistency and quality across the state.
- Provide data to local recipients to increase efficiency, including additional measures of college and career readiness and long-term student outcomes, when available.
- Develop a statewide vision to expand access, equity and quality of early postsecondary, including specific strategies to support early postsecondary within students' career pathways.
- Identify specific criteria to ensure all early postsecondary opportunities are high-quality and transferrable to postsecondary institutions toward specific major/program requirements.

PROGRAM FUNDING

4. States and local recipients have more flexibility in how they spend Perkins funds.

Perkins V significantly increases state and local flexibility in how Perkins funds may be spent. Both the State Leadership (up to 10 percent of the state allocation) and Local Uses of Funds (local recipient subgrant) sections of the law list specific requirements for how Perkins funds must be used to implement various aspects of state and local CTE programs. In many cases, required uses of funds lists specific activities through which the requirement can be met. States and local recipients must demonstrate some investment in each required use of funds listed.

For both states and local recipients, the number of required uses of funds were significantly reduced. In many cases, previously required uses of funds were grouped as possible activities under a single requirement, thus providing more flexibility in how each requirement is met. *Perkins V* also increases the number of permissible uses of State Leadership funds, providing states with even more flexibility in how they invest their resources.

Finally, both the State Leadership and Local Uses of Funds sections of *Perkins V* include a clause that, paraphrased, reads "other activities that improve career and technical education programs." This clause provides additional flexibility for states and local districts to pursue activities outside of the specific uses of funds listed.

Opportunities

Perkins V allows state and local recipients to have more ownership over how they invest their funds. Rather than allocating fewer Perkins funds to support more required activities, states and local recipients can direct more Perkins funds toward fewer activities. This provides an opportunity for leaders to create Perkins budgets that better reflect their unique priorities and needs. States and local recipients that have a clear vision and targeted strategies for high-



quality career programs based on a [CTE program audit](#) will be able to leverage this increased flexibility to support creative, innovative solutions to their biggest challenges.

In addition to the increased flexibility of Perkins funds, the reauthorization and subsequent planning process provides states and local recipients with the opportunity to review and adjust their state and local investments. State and local investments vary across states and communities, but they frequently provide the majority of financial support for CTE programs. States and local recipients that have a clear plan and vision for the improvement of CTE will be able to best take advantage of the increased flexibility for *Perkins V* spending in conjunction with other funding streams.

Challenges and Risks

States that do not have a focused, clear vision for high-quality CTE risk investing in activities that, while allowable, may not result in the intended impact or result in improved student outcomes. The cliché “just because you can, doesn’t mean you should” applies here. There are many activities listed in the uses of funds; however, they may not be equally impactful. States have a responsibility to ensure both state *and* local funds are invested in ways that improve outcomes for students.

States and local recipients that invest smaller amounts in many of the allowable activities may risk reducing the impact of their limited *Perkins* funds. Conversely, states that meet required uses of funds by investing in a single activity run the risk of under-investing in important components of a high-quality CTE system. States and local recipients that do not strategically invest their funds to meet CTE program goals risk slowed or stalled improvement and outcomes for students.

5. States can invest more in innovation through “Perkins Reserve.”

States are required to distribute at least 85 percent of their total state allocation to “eligible local secondary and postsecondary recipients.” Of that amount, *Perkins V* increases the percentage that states may set aside for Perkins Reserve activities, from 10 percent under *Perkins IV* to 15 percent under *Perkins V*. The table below shows how this change impacts available Perkins Reserve funds in small, medium and large-sized states based on FY18 allocations, (assuming these sample states decide to set aside the maximum amount).

Illustration of Potential Perkins Reserve Amount Changes in Three States			
State	Rhode Island	Washington	Texas
Total FY18 Allocation	\$5,804,502	\$21,694,542	\$105,261,209
Local Recipients (85%)	\$4,933,826.70	\$18,440,360.70	\$89,472,027.65
Perkins IV Max Reserve (10% of local)	\$493,382.67	\$1,844,036.07	\$8,947,202.77
Perkins V Max Reserve (15% of local)	\$740,074.01	\$2,766,054.11	\$13,420,804.15
Potential New Reserve Funds Available	+\$246,691.34	+\$922,018.04	+\$4,473,601.38

Historically, states have awarded Perkins Reserve funds to local recipients for a variety of purposes through formula allocations, competitive grants, or a combination of the formula and competitive.

***Perkins V* requires that Perkins Reserve funds must be used to foster innovation in CTE and promote programs aligned with high-skill, high-wage or in-demand occupations or industries.**

Finally, *Perkins V* expands qualifying local recipients of Perkins Reserve funds to include areas with disparities or gaps in performance, in addition to areas that meet geographic and student enrollment requirements.



Opportunities

These changes provide states with the flexibility to invest in innovation and creativity in local areas. States that wish to take advantage of this flexibility should consider using the state's priorities and/or challenges as the framework to establish Perkins Reserve award criteria. States should consider allocating substantial Perkins Reserve funding for local recipients that submit applications to pilot or develop solutions to some of the state's most pressing challenges. For example, in recent years Tennessee used a competitive Perkins Reserve grant process to drive regional partnerships and alignment in support of the Tennessee Pathways initiative, with grant funds being used to support offset costs of intermediary staff, CTE equipment acquisition and career exploration activities for middle and high school students. Other examples of possible Perkins Reserve grant focus priorities could include developing and piloting work-based learning or apprenticeship models, innovative CTE educator recruitment and retention practices, or new programs of study in priority industry fields.

There is an additional opportunity to co-invest some of the reserve funds from the secondary and postsecondary levels to develop and expand early postsecondary opportunities that ensure credit transfer or articulation. This investment could support Perkins V's emphasis on acceleration through early postsecondary experiences and help both levels of CTE meet their core indicators of performance. Co-investment in early postsecondary could include the establishment of secondary/postsecondary shared use facilities, program of study content development or an infrastructure to support early postsecondary credit transfer statewide.

Challenges

Increasing the percentage of funds held for Perkins Reserve activities and/or changing the mechanism by which Perkins Reserve funds are awarded, may create some unexpected challenges for states. Increasing the Perkins Reserve set-aside could cause a decrease in the portion of Perkins funds available to flow to local programs through the state's distribution formula, and possibly local recipients' overall funding level. Additionally, moving from a formula to a competitive grant approach investing in innovation may mean not all eligible recipients receive Perkins Reserve funds.

Singularly or together, these changes may result in some local winners and losers in terms of allocation adjustments or total Perkins funding for some local recipients. This could potentially be offset by increased funding for CTE state grants (a \$70 million increase was included in the [House/Senate conference committee](#) but has not yet been approved by the full Congress), which would likely occur at differing rates depending on the state. It is also important to note that federal funds account for only a portion of all funds invested in CTE programs—state and local funds are used to support the majority of CTE programs across states.

Program Funding Recommendations for States to Consider

- Establish a vision for high-quality CTE and complete a CTE program audit to ensure that state and local budgets reflect the biggest priorities for improving the state's CTE systems.
- Review current uses of other sources of funds (state and local) to ensure all funds are being strategically deployed to quickly improve CTE program quality and student outcomes.
- Increase the amount allocated toward Perkins Reserve funding to drive innovation toward meeting the state's most pressing CTE challenges.
- Co-invest secondary and postsecondary Perkins Reserve funds to support the expansion of high-quality early postsecondary opportunities within CTE programs of study, or other secondary-postsecondary partnerships that support career pathways.



PROGRAM IMPACT AND ACCOUNTABILITY

6. There is a new definition of CTE concentrator.

For the first time, *Perkins V* defines the term CTE concentrator at the secondary and postsecondary level, which is the primary unit of analysis for much of the law's accountability requirements.

CTE Concentrator: A student who concentrates in CTE at the secondary level and completes *at least two* courses in a CTE program or program of study.

Under *Perkins IV* states were provided with [non-regulatory guidance](#) to assist with defining CTE concentrators, which required secondary concentrators to earn three credits within a CTE program area, unless two credit programs were recognized in a given state. The shift under *Perkins V* is three-fold:

1. Shifts the measured student experience from credits earned to courses completed.
2. Reduces the number of credits in most cases (assuming each course is valued at a single credit).
3. Narrows eligible courses to those within the same CTE program or program of study (previously program area).

The postsecondary definition included in the non-regulatory guidance did not change under *Perkins V*.

Opportunities

The formalized secondary CTE concentrator definition allows for an apples-to-apples comparison of student experiences and attainment across states within the accountability system. The overall number of CTE concentrators in states will likely increase. As a result, this definition will include more students in the *Perkins V* accountability framework, holding states responsible for the development of academic, technical and employability skills of more students.

While states are required to report using the federal CTE concentrator definition, states can also develop, collect and publicly share information about students who complete more intensive CTE experiences (e.g., 3-4 courses at the secondary level) or graduating high school with a credential or associates degree in a related field. States and local recipients that choose to collect information about the intensity and sequence of student CTE experiences will be able to better analyze, evaluate, update and promote their CTE programs and associated long-term student outcomes.

[Research from the Brookings Institution](#) shows that “CTE participation is associated with higher wages, with the increase driven entirely by upper-level coursework... each additional year of upper-level coursework is associated with a nearly 2 percent wage increase...” While not included in the accountability system, states can develop policies that recognize and reward students who complete rigorous and intensive CTE experiences (e.g., state honors, recognition at graduation, degree, etc.). States that encourage and celebrate the completion of advanced CTE coursework are investing in their students’ future wages and their future economies.

Challenges and Risks

While having a standard definition of CTE concentrators is important to be able to compare quality and outcomes across states, this secondary definition is less intensive than what many states previously used under *Perkins IV*. The *Perkins V* definition does not incentivize deep, sequential experiences in CTE programs that research has shown impact long-term student outcomes. The two-credit CTE concentrator definition should be the floor for expectations of a student’s CTE experience, not the ceiling, so states should consider collecting and reporting publicly information about students with more intensive CTE experiences.



States that collect and publicly report on only the two-credit CTE concentrator indicator risk lowering expectations for CTE students and programs—and missing an opportunity to raise expectations and accelerate students’ career readiness. Additionally, states that collect only the two-credit CTE concentrator information risk accepting and using these decreased expectations for purposes outside of Perkins reporting, such as in ESSA accountability.

7. States must choose among three new measures of secondary CTE program quality.

Under *Perkins IV*, states were required to report on “student attainment of career and technical skill proficiencies, including student achievement of technical assessments, that are aligned with industry recognized standards, if available and appropriate.” *Perkins V* requires states to choose among three specific indicators of program quality, each of which is a critical component of a career pathway:

1. Percentage of CTE concentrators who graduate high school with a postsecondary credential.
2. Percentage of CTE concentrators who graduate with postsecondary credits in the relevant CTE program.
3. Percentage of CTE concentrators who graduate with work-based learning experience.

States can (but are not required to) report on additional measures of student success in CTE that are statewide, such as measures formerly reported as technical skill attainment.

Opportunities

Having three possible measures of secondary CTE program quality provides states with the flexibility to prioritize and report on the student outcome(s) that are the greatest priority for their state. Conversely, states that have included some of these measures in their ESSA or state accountability systems may choose a new measure(s) with *Perkins V*, expanding the state’s commitment to complementary measures that support the development of college and career ready students.

States also may consider building an infrastructure that captures and publicly reports trends on the measures required, as well as other measures reflective of CTE program quality (a complete listing of these can be found in [ExcelinEd’s Program Quality Indicator Questions and Data Sources](#)). States that begin or continue this work would be able to conduct more in-depth analyses of student outcomes, leading to ongoing program improvement. These insights could be leveraged and publicly reported to ensure that their CTE programs and career pathways truly prepare students for successful careers.

Challenges and Risks

Each of the listed measures may present challenges for states in terms of defining, collecting and reporting data for all CTE programs and students. Within states, the student experiences leading to each of these indicators may vary across CTE programs and career fields. For this indicator to truly reflect the quality of CTE programs, states must consider how they clearly define criteria and/or approved experiences that would be included in the measure(s) selected. This may include substantial state data system upgrades and integrations to reliably capture data related to the selected measure(s).

Additionally, high-quality high school CTE programs are more complex than one measure can reasonably capture. States may choose to select the measure that is most easily collected in existing data systems, or the measure in which they are already performing the best. The adage “what gets measured gets done” rings true. States that do not collect and publicly report on other measures of high school CTE program quality, within or outside of formal accountability systems, risk incentivizing decisions and investments that support growth on the identified measures at the expense of other important program characteristics and student outcomes.



Finally, since each state will choose which of the measure(s) to report for this indicator, it will be more difficult to compare this program quality indicator across states. Many states may not select multiple indicators of secondary program quality to include in their Perkins accountability system. This will likely result in inconsistent measures nationwide and a decreased opportunity for states to compare and share successful CTE policies and practices.

8. States determine their own accountability goals and performance targets.

The *Perkins V* accountability system evaluates the extent to which a state’s CTE concentrators meet state-determined levels of performance across several secondary and postsecondary indicators of performance. These indicators include the following:

Secondary	Postsecondary
<ul style="list-style-type: none"> • Graduation • Proficiency on academic standards • Postsecondary education, training, military or employment rate six months after graduation • Program quality indicators (state-selected) • Enrollment in programs leading to non-traditional fields 	<ul style="list-style-type: none"> • Postsecondary education, advanced training, military, employment six months after completion • Completion of postsecondary credential within one year • Enrollment in programs leading to non-traditional fields

Under *Perkins IV*, states negotiated their performance levels with the U. S. Department of Education. Like ESSA, *Perkins V* empowers states to set their own **state-determined levels of performance** for each of the four years covered by the initial state plan, based on specific criteria. The level of each core indicator performance must be the same for all concentrators in the state. The target level should also require the state to make meaningful progress toward improving the performance of all CTE students, including subgroups. These performance levels must be included in the state plan public comment process and approved by the U.S. Secretary of Education based on the criteria set forth in the law. States will continue to lead negotiations with local recipients related to local performance levels (where applicable), which must equal the state total when aggregated.

Opportunities

State-determined levels of performance allow states to set long-term and annual goals through the *Perkins V* accountability framework that align with their strategic vision for CTE. Additionally, the legislation encourages states to align their *Perkins V* performance goals with other statewide goals (e.g., ESSA, WIOA or other state-specific initiatives). States that triangulate with existing goals can leverage related initiatives and resources to help stakeholders support shared goals.

States also have the opportunity to invest in the development of or upgrades to data collection systems to integrate Perkins reporting requirements with other important CTE indicators, along with other state and federal measures. States that approach this thoughtfully could gain information about the effectiveness of career pathways and student outcomes. This could also help states streamline the reporting process and more seamlessly evaluate their states’ interconnected needs and goals.

Challenges and Risks

While this change allows states to determine their own performance levels, it also presents some challenges. Setting ambitious and achievable goals for state accountability systems is difficult. States that set goals that are not ambitious



risk setting lower expectations for what their students can achieve; while states that set goals that are not achievable risk stakeholder discouragement and loss of trust.

States may not currently collect sufficient data to set appropriate goals and report on all the required indicators. This is especially true at the secondary level. The new CTE concentrator definition, combined with new quality program indicator options, may require some states to set initial goals without baseline data. States may face challenges in setting goals that are both ambitious and achievable while they update their data systems to collect new data.

Program Impact and Accountability Recommendations for States to Consider

- Collect and publicly report information about students who complete in-depth CTE experiences (3-4 credits within a CTE program or program of study). Implement policies and programs that encourage the completion of advanced CTE coursework.
- Integrate state data systems to more easily connect and analyze student benchmarks and outcomes related to college and career readiness. Ensure this data infrastructure captures and publicly reports on multiple measures of CTE program quality, not just the measure(s) chosen for Perkins reporting purposes.
- Establish rigorous criteria to ensure that the student experiences related to each of the indicators of secondary CTE program quality are rigorous and aligned with the student's preparation for his or her field of interest.
- Align state-determined levels of performance for secondary Perkins program quality indicators with other existing state goals (e.g., ESSA, HEA, WIOA and/or state-specific workforce development goals). Ensure all Perkins state-determined levels of performance are both ambitious and achievable.

GUIDANCE FOR STATES PREPARING TO IMPLEMENT PERKINS V

ExcelinEd's new [Career and Technical Education playbook series](#) can help states ensure their CTE programs prepare student for success. The series offers specific, sequential steps.

1. To ensure your state has a clear, articulated vision for CTE as part of seamless career pathways and strategies to promote economic development, review [CTE Playbook 1: Putting CTE to Work for Students](#). This playbook provides information on how states can develop a strategic plan for CTE. States that use *Perkins V* as a tool to advance their larger workforce education goals, rather than as a goal in and of itself, will be able to strategically leverage resources across multiple stakeholder groups to expand access to, and successful completion of, pathways that lead students to successful careers.
2. To start having conversations with state, regional and industry partners about the *Perkins V* reauthorization, review [CTE Playbook 2: Building Cross-Sector Partnerships to Support Career and Technical Education Pathways](#). This resource can help you cultivate and expand your partnerships to support your state's upcoming state planning process and subsequent implementation.



3. To complete a CTE program audit that drives strategic planning about CTE in your state, review [CTE Playbook 3: Auditing a State Career and Technical Program for Quality and the associated toolkit of resources](#). This playbook will help you take stock of your state's CTE programs, successes, and opportunities. It will help you answer important questions, such as: Are all CTE programs rigorous and designed to lead students to successful careers in in-demand fields? Are any CTE programs leading students to dead-ends in the labor market?
4. To take critical stock of your state's data system(s) related to CTE measures and outcomes, use the [Program Quality Indicator Questions and Data Sources template](#) in conjunction with CTE Playbook 3. This resources will give you format to collect data from important sources and answer questions, such as: What data is already available that is useful in driving programmatic decisions and measuring long-term impact? What data does not currently exist in a usable format? How can my state ensure that our data systems are designed and integrated not only to meet reporting requirements, but to provide information about the quality, scale and long-term outcomes of CTE programs?

Additional Perkins V Resources

ExcelinEd: [CTE Playbook Toolkits](#)

- [Playbook 1: Putting CTE to Work for Students](#)
- [Playbook 2: Cross-Sector Partnerships](#)
 - Resource: [Partnership Organization and Recruitment](#)
 - Resource [Partnership Roles and Agreements](#)
 - Resource: [Partnership Management](#)
- [Playbook 3: Auditing CTE Programs for Quality](#)
 - Template: [Purpose and Priorities](#)
 - Template: [PQI Questions and Data Sources](#)
 - Template: [Audit Rubric](#)

Advance CTE

- [Perkins Resource Page](#) (includes summaries and redline)

Office of Career, Technical and Adult Education, U.S. Department of Education

- [Perkins V: An Opportunity to "ReThink CTE"](#) (Sept. 2018)

Perkins Act ([Full Text](#))