MEMORANDUM

To: U.S. House of Representatives, Committee on Education and the Workforce
From: Alliance for Excellent Education

The Alliance for Excellent Education appreciates the opportunity to provide recommendations to the U.S. House of Representatives Committee on Education and the Workforce (the Committee) on the reauthorization of the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins). The economic success of the country depends on a qualified and competent workforce that demonstrates advanced levels of knowledge and skill. It is incumbent upon the nation to ensure that its students have access to high-quality educational programs that prepare them for the jobs that exist in the twenty-first century. It is for this reason that the House of Representatives passed with overwhelming bipartisan support the Strengthening Career and Technical Education for the 21st Century Act (H.R. 5587) in 2016.

The Alliance is pleased with several provisions within the bill as introduced in May 2017 by Representatives Thompson and Krishnamoorthi. The bill (H.R. 2353) strengthens core indicators of performance at the secondary school level to measure students who have attained a recognized postsecondary or a work-based learning experience upon graduating from high school. The bill provides greater visibility for work-based learning and dual- or concurrent-enrollment programs that provide rigorous and relevant learning opportunities for students in career and technical education (CTE) programs. The bill appropriately broadens the definition of special populations to include homeless youth and youth who have aged out of the foster care system. Finally, it aligns performance measures used to evaluate CTE programs with those set by the Every Student Succeeds Act (ESSA) and streamlines performance measures at the postsecondary level and aligns them with those in the Workforce Innovation and Opportunity Act (WIOA).

The Alliance worked with education practitioners and CTE leaders to develop a legislative proposal designed to ensure that all students who participate in CTE programs have access to high-quality instruction, which culminated in the Perkins Fund for Equity and Excellence Act (S. 1004), a bipartisan bill introduced by Sens. Kaine, Portman, Baldwin, Capito, Young, and Hassan. If your boss is interested in introducing a House companion, the Alliance would be happy to discuss in further detail.

As the House seeks to reauthorize the Perkins Act, the Alliance respectfully requests your consideration of several recommendations aimed at strengthening and improving CTE programs. The red-line edits below reflect suggested changes to the Strengthening Career and Technical Education for the 21st Century Act (H.R. 2353).
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1. 21st Century Skills

Recommendation: Ensure CTE course work prepares students for jobs in the twenty-first-century economy.

Rationale: All students, whether matriculating through a general education program of study or a CTE program of study, need to graduate from high school not just with academic knowledge and the ability to take tests; they need the ability to solve practical problems, communicate effectively, and work collaboratively. Note: the amendment to the definition of CTE under section 7 was included in the Senate’s 2016 draft reauthorization bill.

Suggested red-line edits to H. R. 2353:

Section 7. Definitions

- Page 7, line 7: Strike (i) and (ii) and redesignate (iii) and (iv) as (ii) and (iii), respectively, and insert:

  “(i) by striking “applied learning” and all that follows through “problem-solving skills” in subparagraph (B) and inserting “work-based, or other applied learning opportunities that supports the development of academic knowledge, problem-solving skills, the ability to work collaboratively and communicate effectively.”;

Section 121. State Plan

- Page 59, line 19: Rewrite to read:

  “(B) each eligible recipient will promote skill attainment, including skill attainment transferable skills such as problem-solving skills, the ability to work collaboratively and communicate effectively, that leads to a and skills that lead to a recognized postsecondary credential; and

Section 123. State Leadership Activities

- Page 73, line 6: After the semicolon, strike “or” and insert “and”
2. Employer Engagement

**Recommendation:** Strengthen the role of employers to ensure CTE programs of study align with industry needs and to encourage the facilitation of high-quality work-based learning.

**Rationale:** Partnerships between CTE programs and the business community 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.

*Suggested red-line edits to H. R. 2353:*

**Section 123. State Leadership Activities**

- Page 75, line 10: After “opportunities” insert: , including paid work experience;

**Section 131. Local Application for Career and Technical Education Programs**

- Page 77, line 21: Strike (3) and insert:

  “(3) a description of partnerships with employers in place or that will be developed, including how such partnerships will be utilized to—
  “(A) provide students with a continuum of work-based learning experiences, including opportunities such as career exploration, job shadowing, pre-apprenticeship programs, mentoring, internships, school-based enterprises, and virtual work-based learning opportunities;
  “(B) engage employers in program design, curriculum development, program evaluation, and assessments of student work; and
  “(C) provide educators with externship opportunities; and

**Section 132. Local Uses of Funds**

- Page 87, line 16: Insert:

  “(E) a continuum of work-based learning opportunities, including opportunities such as career exploration, job shadowing, pre-apprenticeship programs, mentoring, internships, school-based enterprises, virtual work-based learning opportunities, and paid work experience;
3. Alignment Between Local Educational Agencies (LEAs) And Institutions of Higher Education (IHEs)

Recommendation: Increase the number of students who receive a postsecondary credential by strengthening the alignment between LEAs and IHEs.

Rationale: By 2020, two-thirds of jobs will require postsecondary education. Unfortunately, the disconnect between high school and postsecondary education prevents many students from securing a credential that will prepare them for a job. The U.S. Congress recognizes the importance of streamlining systems that have for too long been siloed through language incorporated in both ESSA and WIOA. H. R. 5587 aims to do the same but could include more robust language related to collaboration between LEAs and IHEs to improve the transition from secondary education to postsecondary education.

Suggested red-line edits to H. R. 2353:

Section 131. Local Application for Career and Technical Education Programs

- Page 77, line 21: Strike (3), redesignate (4) as (3), and insert:

  “(4) a description of the career and technical education programs that the eligible recipient will develop and implement to provide students participating in career and technical education programs with the opportunity to gain postsecondary credit while still attending high school, such as through dual- or concurrent-enrollment programs or early college high school, as practicable;

  “(5) a description of how the eligible recipient will facilitate the effective transition of students from secondary school to postsecondary education, including through the development of articulation agreements to ensure that credits earned through opportunities described under paragraph (4) are transferable toward a recognized postsecondary credential;

  “(6) a description of the evidence-based transitional support strategies that will be implemented for students who are off-track to meeting postsecondary education eligibility requirements or who require remediation in mathematics or English to progress to credit-bearing and degree-applicable course work in postsecondary education.

Section 132. Local Uses of Funds

- Page 87, line 7: Amend as follows:

  “(C) dual or concurrent enrollment programs, including early college high schools, and the development or implementation of articulation agreements, that ensures postsecondary credits earned are transferable toward a recognized postsecondary credential;
4. Integrated Student Supports

**Recommendation:** Strengthen student supports that address the comprehensive needs of special student populations, including underrepresented student subgroups.

**Rationale:** Integrated student supports to help to ensure that students, when needed, can receive additional services to maximize their participation in and achieve the desired outcomes from the CTE program. For the vision of Perkins reauthorization to be realized, Congress should also incorporate language to ensure that LEAs provide appropriate career/academic counseling and wrap-around services to students as they matriculate through their CTE course work.

*Suggested red-line edits to H. R. 2353:*

**Section 131. Local Application for Career and Technical Education Programs**

- Page 78, line 5: Redesignate (4) as (5), and insert:

  “(4) a description of the integrated student supports that will be made available to address the comprehensive needs of students, informed by the comprehensive needs assessment conducted under subsection (c), which may include—

  “(A) accelerated and targeted instruction for historically underserved students served under this Act who require additional support in order to meet proficiency requirements in core academic or technical subjects;

  “(B) universal and individualized academic and nonacademic, college and career guidance and counseling, beginning in middle school that includes the development of individual development plans for each student and is reviewed at regular intervals throughout the year and annually;

  “(C) a system of timely, consistent, and structured student supports that include an assessment of academic and career and technical course work needed for high school completion and successful postsecondary education transition, work-based learning experiences, the development of career objectives, and college planning, including financial planning and labor market data on in-demand industry sectors or occupations; and

  “(D) a community-based approach that provides wraparound academic, social, and emotional, and health supports to improve overall youth development; and

**Section 132. Local Uses of Funds**

- Page 83, line 24: Redesignate (A) as (B), strike (C), insert the following, and reletter accordingly:

  “(A) a system of timely, consistent, and structured student supports that include an assessment of academic and career and technical course work needed for high school completion and successful postsecondary education transition that results in an individual
development plan, work-based learning experiences, and college planning, including financial planning and labor market data on in-demand industry sectors or occupations;

“(A) introductory courses or activities focused on career exploration and career awareness;

“(B) readily available career and labor market information, including information on—

“(i) occupational supply and demand;
“(ii) educational requirements;
“(iii) other information on careers aligned to State or local economic priorities; and
“(iv) employment sectors;

“(C) programs and activities related to the development of student graduation and career plans;

“(D) career guidance and academic counselors that provide information on postsecondary education and career options; or

“(E) any other activity that advances knowledge of career opportunities and assists students in making informed decisions about future education and employment goals;
5. Qualified Intermediaries

Recommendation: Improve the efficiency and impact of CTE programs by utilizing a qualified intermediary to facilitate coordination among LEAs, IHEs, and employers.

Rationale: Strong and coordinated systems are often difficult to achieve unless a third-party “qualified intermediary,” who is well-versed in the work of the interested stakeholders, is responsible for ensuring the coordination occurs. This is because LEAs, IHEs, and employers are frequently unaccustomed to working together and lack the capacity to facilitate joint work. The addition of the language below will allow, where appropriate, a third-party “qualified intermediary” to perform this coordinating function. In practice, chambers of commerce, workforce investment boards, and other nonprofit organizations have effectively served in this role. H. R. 5587 defines the term “qualified intermediary” on page 16, line 18.

*Suggested red-line edits to H. R. 2353:*

**Section 121. State Plan**

- Page 55, line 10: Rewrite to read:

  “(ii) interested community representatives, including parents, and students, qualified intermediaries, and community-based organizations;”

**Section 132. Local Uses of Funds**

- Page 86, line 24: After “local area,” insert “which may include qualified intermediaries,”
6. Professional Development

**Recommendation:** Clarify that Perkins funds **may be used for integrated professional development and provide opportunities for cross-credentialing.**

**Rationale:** To integrate academics and CTE effectively, traditional and CTE teachers should have the opportunity to participate in joint professional development. Further, educators need opportunities for cross-credentialing (i.e., the ability to have a CTE and traditional teaching credential) to better integrate CTE and traditional instruction. Several school districts have voiced concerns regarding their inability to use Perkins funds for these purposes. The following language is intended to ensure states and districts have the flexibility to use Perkins funds for integrated professional development and cross-credentialing.

*Suggested red-line edits to H. R. 2353:*

**Section 121. State Plan**

- Page 60, line 9: Before the semicolon, insert:

  , including how—
  
  “(A) the eligible agency will provide opportunities for cross-credentialing to provide teachers with both an academic single-subject credential and a career and technical education credential, and
  
  “(B) how the eligible agency will provide opportunities for integrated professional development for teachers providing instruction in career and technical education and general education teachers;

**Section 131. Local Application for Career and Technical Education Programs**

- Page 80, line 14: Redesignate (F) as (G), and insert:

  “(F) a description of how the eligible recipient will provide integrated professional development for teachers providing instruction in career and technical education and general education teachers; and

**Section 132. Local Uses of Funds**

- Page 84, line 23: Amend as follows:

  “(A) supports individualized academic and career and technical education instructional approaches, including **integrated professional development for teachers providing instruction in career and technical education and general education teachers to assist in** the integration of academic and career and technical education standards and curriculum;
• Page 86, line 1: Insert: new (G)

“(G) provides educators with opportunities for cross-credentialing to provide teachers with both an academic single-subject credential and a career and technical education credential;

• Page 87, line 22: Amend as follows:

“(G) efforts to recruit and retain career and technical education program administrators and educators, including educators with both an academic single-subject credential and a career and technical education credential;
7. Supporting Traditionally Underserved Students

**Recommendation:** Align the statutory language in Perkins and ESSA to ensure that both laws focus attention on the same groups of traditionally underserved students.

**Rationale:** ESSA and Perkins both emphasize traditionally underserved students, but the two laws define these populations differently. The red-line edits below will ensure that states and LEAs focus attention on the same underserved populations of students under Perkins and ESSA.

*Suggested red-line edits to H. R. 2353:*

**Section 121. State Plan**

- Page 55, line 16: After “populations” insert “and underrepresented students described in section 1111(b)(2)(B)(xi) of the Elementary and Secondary Education Act of 1965”

- Page 58, line 19: After “populations” insert “and underrepresented students described in section 1111(b)(2)(B)(xi) of the Elementary and Secondary Education Act of 1965”

- Page 59, line 12: After “populations” insert “and underrepresented students described in section 1111(b)(2)(B)(xi) of the Elementary and Secondary Education Act of 1965”

**Section 131. Local Application for Career and Technical Education Programs**

- Page 78, line 8: After “populations” insert “and underrepresented students described in section 1111(b)(2)(B)(xi) of the Elementary and Secondary Education Act of 1965”

- Page 80, line 3: After “populations” insert “and underrepresented students described in section 1111(b)(2)(B)(xi) of the Elementary and Secondary Education Act of 1965”