

THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

TO: P-12 Education Committee

FROM: Dr. Kimberly Young Wilkins *Kimberly Young Wilkins*

SUBJECT: Perkins V State Plan

DATE: January 30, 2020

AUTHORIZATION(S): *Sharon L. Tabor*

SUMMARY

Issue for Decision

Should the Board of Regents approve the four-year State plan for career and technical education as required under the federal Carl D. Perkins Career and Technical Education Act of 2006 as amended by the Strengthening Career and Technical Education for the 21st Century Act of 2018?

Reason for Consideration

Required by Federal statute.

Proposed Handling

This item will be presented to the P-12 Education Committee and for recommendation to the Full Board for action at its February 2020 meeting.

Background Information

When the Perkins legislation was reauthorized in 2018, states were given a series of options to submit their plans for the subsequent five-year period. New York, as most other states, chose the option to create a one-year transition plan for the 2019-20 program year which was submitted to the USDE in May 2019, followed by a full four-year plan due to the USDE on April 15, 2020. Our Perkins one-year transition plan gave the Department time to do the necessary public outreach and planning to develop a strategic and thoughtful four-year plan that will address New York's priorities for the coming years. In

addition, the transition plan signaled to the field the coming changes to be implemented to comply with the law, so they, too, had adequate time to prepare.

Funding

Current funding level for **NY Perkins V** in the July 1, 2019 to June 30, 2020 program year is \$56,867,904.

Perkins requires that states distribute 85 percent of funds to local recipients by formula (both secondary and postsecondary). New York directs 52 percent of the Perkins funds to secondary-level recipients and 48 percent to postsecondary recipients.

The remaining 15 percent of a state's allocation is divided between state leadership activities and state plan administration – 10 percent can be directed to state leadership, and 5 percent of Perkins funds may be used for state plan administration activities. Accessing the full 5 percent requires a dollar-for-dollar state match in expenditures directed to the overall administration of the Perkins State Plan.

Purpose of Perkins V: Strengthening Career and Technical Education for the 21st Century Act

The purpose of funding under the Strengthening Career and Technical Education for the 21st Century (Perkins V) Act is to more fully develop the academic knowledge and technical and employability skills of secondary education students and postsecondary education students who elect to enroll in career and technical education programs by:

- Increasing employment opportunities for subgroups and special populations;
- Including preparation in high-skill, high-wage, or in-demand occupations;
- Integrating rigorous and challenging academic and CTE instruction that link secondary and postsecondary education;
- Providing technical assistance that improves the quality of CTE faculty; teachers, counselors, and administrators;
- Supporting partnerships between secondary, postsecondary, local workforce boards, business, and industry; and
- Providing individuals with opportunities and skills to keep the US competitive.

Priorities Addressed in the State's Perkins V Plan Include:

- Increasing access to high-quality CTE programs;
- Supporting at-risk students enrolled in CTE programs;
- Improving career development for all students;
- Building regional collaboration among secondary and postsecondary education and business/industry grounded in labor market needs, including the development of regional articulation agreements.

Stakeholder Engagement

The Department has engaged with a wide variety of stakeholders from across the State including but not limited to:

- Representatives from secondary and postsecondary CTE;
- Representatives of agencies serving out-of-school youth, homeless children and youth, and at-risk youth;
- Community representatives, including parents and students;
- Representatives from State workforce development board;
- Representatives of special populations;
- Representatives from business and industry;
- Representatives of Indian Tribes and Tribal organizations; and
- Individuals with disabilities.

In addition to the above groups, Perkins V calls for consultation with the governor during the development of the four-year plan. States are also required to provide the governor's office a 30-day review period prior to plan submission. The Department will continue to engage in ongoing consultation throughout the next four years of implementation.

Major Changes for Perkins Recipients

- **Comprehensive Local Needs Assessment:** A comprehensive assessment of all programs will direct the use of Perkins funds. The local application will focus recipients on efforts to close performance gaps uncovered in the needs assessment.
- **Accountability:** More detailed, program-level data will be used to assess areas needing improvement (Perkins IV relied on aggregated school-level data).
- **Fund Use:** Secondary Perkins funds may be used only for NYSED-approved programs.
- **New Program Quality Performance Indicator:** The percentage of secondary students participating in work-based learning will be tracked.
- **New Federal Definition for Program of Study:** All postsecondary recipients must have at least one program that meets the federal definition. This ensures alignment between secondary education, postsecondary education, and the workforce.
- **Postsecondary Core Indicators of Performance:** The new legislation provides three core indicators, whereas the previous legislation had provided six.

Steps Taken to Date

- Multiple face-to-face stakeholder sessions
- Multiple electronic surveys deployed
- Establishment and convening of a CTE Advisory Panel

- Major revision of data reporting procedures by CTE Office and Information and Reporting Services (IRS) in consultation with regional information centers (RIC) data managers
- Development and release of performance targets
- Creation of Comprehensive Local Needs Assessment (CLNA) template and guidance
- Creation of local application
- Public hearings to solicit feedback about the Perkins V State Plan
- Compilation of public comments and questions
- Meeting with CTE Advisory Panel to address comments and questions
- Revision of draft Perkins V State Plan based on public comments
- Creation and posting of Q&A based on public comments regarding the CLNA

Summary of Comments and Related Changes to Final Plan Documents

- At the secondary level, some commenters felt that the emphasis on making access to CTE programs for students with disabilities (a federally identified special population) was unnecessary, as their programs have enrollments higher than non-CTE programs.
 - NYSED has clarified in the plan that access is not just limited to the ability to enroll and attend but includes appropriate supports for participation and success within the program, including but not limited to: multiple access points to program sequences; using only enrollment access criteria that are educationally necessary; offering a robust set of student supports that help all students succeed in courses; and publishing materials that encourage all students to participate and making these materials available in multiple languages.
- At the secondary level, some commenters disagreed with only allowing NYSED-approved programs to receive Perkins funding as some schools/programs will no longer be able to access funding.
 - NYSED’s response is that federal legislation requires programs to meet the definition of “Program of Study.” The term ‘program of study’ means a coordinated, nonduplicative sequence of academic and technical content at the secondary and postsecondary levels that:
 - incorporates challenging state academic standards, including those adopted by a state under section 1111(b)(1) of the elementary and Secondary Education Act of 1965;
 - addresses both academic and technical knowledge and skills, including employability skills;
 - is aligned with the needs of industries in the economy of the state, region, Tribal community, or local area;
 - progresses in specificity (beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction);
 - has multiple entry and exit points that incorporate credentialing; and
 - culminates in the attainment of a recognized postsecondary credential.

NYSED's approval process aligns with this definition, and without a program undergoing the approval process, we cannot determine if the program meets the definition.

- At the secondary level, some commenters disagreed with NYSED's decision not to allow Perkins funding to be directed toward the start-up costs of new programs.
 - NYSED's response is that for the first year of implementation, new programs will not be funded, as completing the required CLNA to study the program would not be possible. The program office will study making this option available, the resources needed to develop a process to approve this funding that complies with the federal legislation (size, scope, quality), as well as the resources needed to develop new programs.
- At both the secondary and postsecondary levels, some commenters had operational questions about the CLNA.
 - These questions did not require changes to the State plan but clarification from NYSED. The Office of CTE has created and posted a Q&A to our website dedicated to responding to these questions as recipients conduct their needs assessments.
- At the postsecondary level, commenters felt the targets for the core performance indicators were too high and unobtainable.
 - The Office for Postsecondary Access, Support, and Success reviewed the comments and the process for determining the targets and agreed that the plan and its supporting postsecondary documents will reflect revised targets for the postsecondary core performance indicators.

Next Steps Include:

- Consultation with the Governor's office;
- Submission of the State Plan to US Department of Education (USDOE);
- Development of guidance for the local application; and
- Continued collaboration with internal program offices, local school district leaders, BOCES, higher education institutions, business and industry partners, CTE professional organizations, parents, students, and other key stakeholder groups to implement the work outlined in the State Plan, such as development of work-based learning standards and curricular frameworks.

Attachments

All of the following attachments will be forwarded to the Governor and will subsequently be submitted to the USDOE by April 15, 2020. The attachments include the Perkins V State Plan (attached here), the Comprehensive Local Needs Assessment (CLNA) templates and the local application templates for both secondary and postsecondary applicants. (Attachments 2-9 are available upon request.) These documents will be submitted by local districts and postsecondary institutions that wish to apply to NYSED for their Perkins allocation. It is important to note that these are allocations and not competitive grants. Each district generates an allocation and must apply and meet minimum criteria set by the State as outlined in the legislation.

- Attachment 1: Revised Perkins V State Plan
- Attachment 2: Revised Secondary CLNA Guidance
- Attachment 3: Revised Secondary CLNA Template
- Attachment 4: Secondary CLNA Summary
- Attachment 5: Secondary 2020-21 Perkins V Local Application
- Attachment 6: Revised Postsecondary CLNA Guidance
- Attachment 7: Revised Postsecondary CLNA Template
- Attachment 8: Revised Postsecondary CLNA Summary
- Attachment 9: Postsecondary Local Application

Related Regents Items

November 2019: [Perkins V Update](http://www.regents.nysed.gov/common/regents/files/1119p12d4.pdf)
(<http://www.regents.nysed.gov/common/regents/files/1119p12d4.pdf>)

March 2019: [Perkins V Update](https://www.regents.nysed.gov/common/regents/files/419p12hed1.pdf)
(<https://www.regents.nysed.gov/common/regents/files/419p12hed1.pdf>)

February 2007: [Perkins IV Career and Technical Education Interim State Plan](http://www.regents.nysed.gov/common/regents/files/documents/meetings/2007Meeting%20February2007/0207emscvesida3.htm)
(<http://www.regents.nysed.gov/common/regents/files/documents/meetings/2007Meeting%20February2007/0207emscvesida3.htm>)

January 2008: [Five-Year State Plan for Career and Technical Education \(Carl D. Perkins Career and Technical Education Improvement Act of 2006\)](http://www.regents.nysed.gov/common/regents/files/documents/meetings/2008Meeting%20February2008/0208emsca2.doc)
(<http://www.regents.nysed.gov/common/regents/files/documents/meetings/2008Meeting%20February2008/0208emsca2.doc>)

Recommendation

It is recommended that the Board of Regents take the following action:

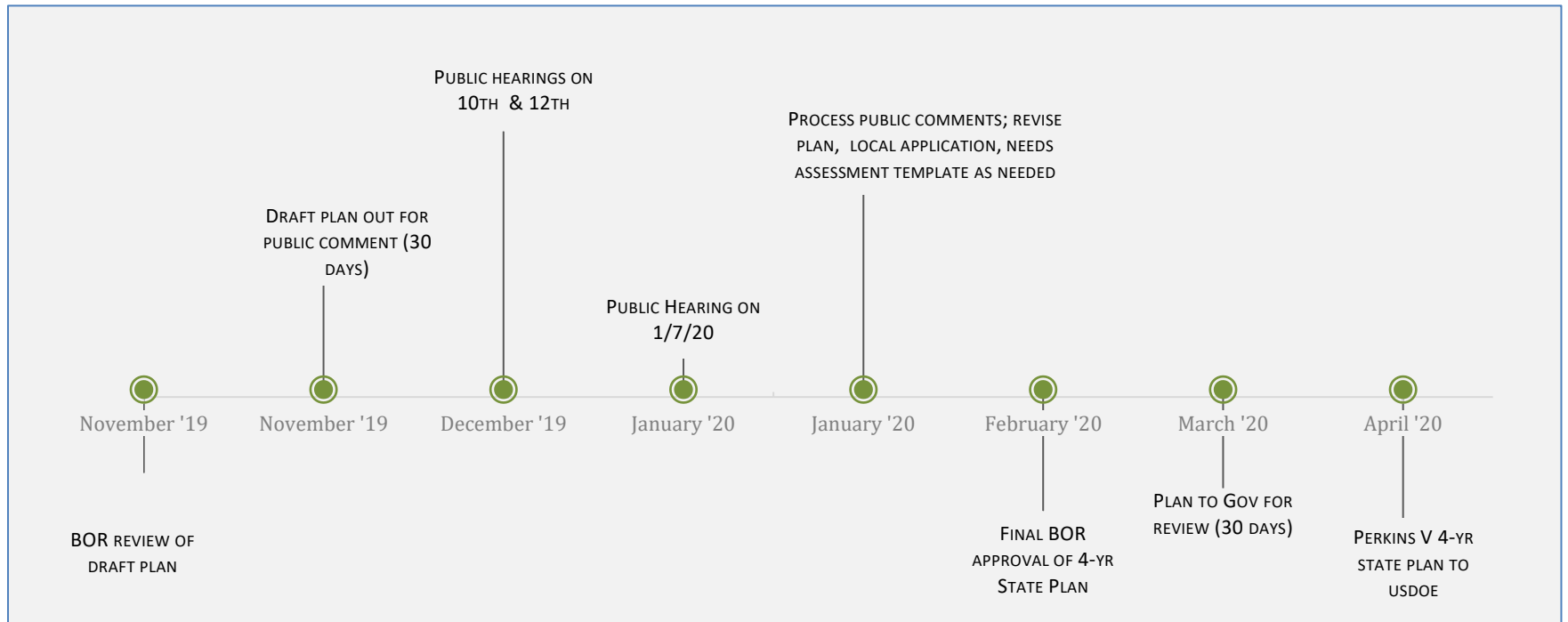
VOTED: That the Board of Regents approve the revised New York State Perkins V Plan as attached and direct staff to forward the plan and supporting documents to the office of the Governor for review and subsequently to the US Department of Education no later than April 15, 2020.

Timeline for Implementation

1. March 2020: The final plan will be submitted to the Governor's office for review.
2. April 15, 2020: The final plan will be submitted to the USDOE.
3. If approved by USDOE, plan implementation begins July 1, 2020.

Attachment

Perkins V Plan Development: November 2019 to May 2020





The University of the State of New York

The New York State Education Department

Career and Technical Education

New York State Perkins V Plan: 2020-21 to 2023-2024

Career and Technical Education Team
New York State Education Department
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II. NARRATIVE DESCRIPTIONS

A. PLAN DEVELOPMENT AND CONSULTATION

A1 Plan development in consultation with stakeholders

Describe how the State Plan was developed in consultation with the stakeholders, and in accordance with the procedures in Section 122(c)(2) of Perkins V. See Text Box 1 for the statutory requirements for State Plan consultation under section 122(c)(1) of Perkins V.

The New York State Education Department (NYSED) developed the Perkins State Plan in consultation with both secondary and postsecondary career and technical education teams with feedback from a variety of stakeholders around the state. Recommendations were considered from a variety of stakeholder groups including P-12 academic and CTE teachers and administrators; higher education faculty and administration; career guidance and academic counselors; eligible Perkins recipients; parents and students; representatives of students with disabilities and English language learners; representatives of business and industry (including representatives of small business); representatives of labor organizations; representatives of agencies serving out-of-school youth; homeless children and youth; and at-risk youth, including the State Coordinator for Education of Homeless Children and Youths established or designated under section 722(d)(3) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11432(d)(3)); representatives of Indian Tribes and Tribal organizations located in, or providing services in, the State.

Methods of gathering stakeholder input were varied. Face to face meetings were held with the following stakeholder groups:

Association of Career and Technical Education Administrators (ACTEA)

New York State Technology and Engineering Educators Association

NYS Business Educators

DECA Career and technical student organization

Future Business Leaders of America

NYS Association of Family and Consumer Sciences Educators

Agricultural Education Teachers

NYS Technology & Engineering Educators' Assoc

Small City Schools

NYS Parent Teacher Association

Cosmetology teachers

Workforce Innovation Opportunity Act Combined Plan Workgroup

Workforce Innovation Opportunity Act Youth Collaborative Workgroup

EOC Directors Meeting

BIG 5 CTE Schools CTE Directors, Yonkers, NYC, Syracuse, Rochester, Buffalo

In addition, several surveys to the field were deployed. There were 1800 surveys responses compiled and analyzed by NYSED staff. Feedback was considered in the development of each plan component.

The Governor's Office was consulted with respect to State Plan development including the participation of the Governor's staff in meetings with NYSED's executive deputy commissioner who provided an initial overview of the Perkins legislation and strategies for plan development. At various stages in plan development the Governor's Director of Workforce Development and Assistant Director for Education in the Executive Chamber were provided drafts of plan components as well as the final draft plan before the first and final submission to the Board of Regents.

The same stakeholder groups who participated in the development of the State Plan were invited to provide public comment both through public hearings and/or in writing.

Numerous activities and procedures described in section 1 above, provided comprehensive and ready access for all key stakeholders. These included face-to-face opportunities for input through the public hearings, as well as access to electronic and print information that were designed to be readily available and user-friendly. Interested stakeholders had a variety of mechanisms available to them to review materials and to provide input. Representatives of the following groups were sought out for their perspective. The New York State plan was developed in in consultation with—

- (i) representatives of secondary and postsecondary career and technical education programs, including eligible recipients and representatives of 2-year minority serving institutions and historically Black colleges and universities and tribally controlled colleges or universities in States where such institutions are in existence, adult career and technical education providers, and charter school representatives in States where such schools are in existence, which shall include teachers, faculty, school leaders, specialized instructional support personnel, career and academic guidance counselors, and paraprofessionals;
- (ii) interested community representatives, including parents, students, and community organizations;
- (iii) representatives of the State workforce development board established under section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) (referred to in this section as the "State board");
- (iv) members and representatives of special populations;
- (v) representatives of business and industry (including representatives of small business), which shall include representatives of industry and sector partnerships in the State, as appropriate, and representatives of labor organizations in the State;
- (vi) representatives of agencies serving out-of-school youth, homeless children and youth, and at-risk youth, including the State Coordinator for Education of Homeless

Children and Youths established or designated under section 722(d)(3) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11432(d)(3));

(vii) representatives of Indian Tribes and Tribal organizations located in, or providing services in, the State;

(viii) individuals with disabilities; and

(B) consult the Governor of the State, and the heads of other State agencies with authority for career and technical education programs that are not the eligible agency, with respect to the development of the State plan.

A2 Section 122(e)(1)

Consistent with section 122(e)(1) of Perkins V, each eligible agency must develop the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education after consultation with the State agencies identified in section 122(e)(1)(A)-(C) of the Act. If a State agency, other than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary. (Section 122(e)(2) of Perkins V)

The New York State Education Department serves as the administrative entity for secondary, postsecondary, and adult career and technical education. The New York State Board of Regents (BOR) serves as the policy-making entity for all of these areas. Thus, the State Plan, as developed by the NYSED and approved by the Board of Regents, does not require consultation with any other state agency in the areas of adult, postsecondary, and secondary career and technical education.

A3 Opportunities for Public Comment

Describe opportunities for the public to comment in person and in writing on the State plan. (Section 122(d)(14) of Perkins V)

NYSED conducted public hearings, after appropriate and sufficient notice, for the purpose of affording all segments of the public and interested organizations and groups an opportunity to present their views and make recommendations regarding the State Plan.

State Plan development activities were conducted in accordance with the framework of consultations required by section 122(c)(1)(A-B) and section 122(c)(2) of the Act. Accordingly, NYSED:

- created a steering committee comprised of representatives from secondary, postsecondary and adult education CTE personnel at NYSED to solicit input from diverse stakeholders to ensure there was a comprehensive and accessible approach to the development of the State Plan;

- developed a State Plan webpage, which included potential new directions under consideration for inclusion in the State Plan, ways to provide stakeholder input, and other Plan-related content such as
 - proposed selection of the state’s quality indicator, measurement definitions, state-determined levels of performance on Perkins V indicators;
 - vision and state priorities for CTE;
 - dates, times, and locations of the public hearings;
 - related documents for background information, including the Perkins V Act and the NYSED 2019-2020 Transition Plan;
 - forms for submitting input to the State Plan; and
 - a Questions and Answers section about the State Plan and the development process
- established a CTE Advisory Panel comprised of representatives from secondary and postsecondary local recipients and experts to provide specific input and feedback on key components of the State Plan, the Comprehensive Local Needs Assessment, and the local application.

Once the State Plan draft was submitted to the New York State Board of Regents for review, three regional public hearings were conducted in New York City, the Capital District, and Central New York to provide opportunities for public input. Plan informational sessions were included in the New York State Career and Technical Education Technical Assistance Center (CTE TAC) fall and winter (December 2019 and January 2020, one on Long Island and one in Albany) meetings. These provided an overview of new features and directions reflected in the application process for formula and competitive funding under the Act.

Public Hearings. NYSED in consultation with the CTE TAC designed and conducted a series of public hearings to obtain input into the drafting of the State Plan. Each public hearing included presentations by NYSED personnel that provided background information on Strengthening Career and Technical Education for the 21st Century Act, the state’s vision and priorities, and the process used to develop the State Plan. Throughout the public hearing period, comments were also received via email and in writing from interested stakeholders. CTE TAC hearing announcements, a summary of comments and recommendations received during the public comment period, and NYSED’s response to those comments and recommendations are found below.

You must include a summary of the above recommendations and the eligible agency’s response to such recommendations in the State plan [Sec. 122(a)(3)]

SUMMARY OF PUBLIC COMMENTS

State Priorities for Perkins V	
<p>As referenced on page 24 of the Perkins V draft plan “The NYSED plans to continue work on expanding access to CTE for special populations by beginning with an inquiry into the nature of the existing barriers to participation and successful completion.” How does the state suggest there are existing barriers to participation for that special population when some program enrollment is predominantly composed of special populations?</p>	<p>Access to programs involves more than the ability to enroll and attend. The New York State Education Department released guidance on equitable course access guidance in November 2019 to assist school districts in their efforts to provide course access equity. The guidance focused on advanced courses, but the guiding principles put forth apply to all subject areas, including CTE. Five district- and school-level guiding principles are offered:</p> <ol style="list-style-type: none"> 1. Providing a course sequence and foundation-building in earlier grades 2. Creating multiple access points to programs 3. Using only enrollment access criteria that are educationally necessary; 4. Offering a robust set of student supports that help all students succeed 5. Publishing materials that encourage all students to participate (e.g., materials available in multiple languages.)¹
<p>Priority one of the State Plan is “increase access to high quality CTE” and priority two is “support at-risk including SWD and ELL’s enrolled in CTE”. The CLNA documents seem to have merged these two priorities as access to high quality CTE for SWD and ELL’s as specifically stated multiple times. Are these the only groups the state is interested in? There may be other special populations, including gifted and talented, that could benefit from the amount of focus being placed on SWD in CTE.</p>	<p>States must develop plans that use the Perkins V definitions. In Perkins V:</p> <p><i>“The term ‘special populations’ means— (A) individuals with disabilities; (B) individuals from economically disadvantaged families, including low-income youth and adults; (C) individuals preparing for non-traditional fields; (D) single parents, including single pregnant women; (E) out-of-workforce individuals; (F) English learners; (G) homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); (H) youth who are in, or have aged out of, the foster care system; and (I) youth with a</i></p>

¹ See [Equitable Course Access Guidance](#) a field memo from Dr. Kimberly Young Wilkins, NYSED Deputy Commissioner of Instructional Support accessed January 10,2020.

<p>State Priorities for Perkins V</p>	
	<p><i>parent who— (i) is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and (ii) is on active duty (as such term is defined in section 101(d)(1) of such title).” Perkins V Sec.1(b)48</i></p>
<p>The State Plan should further specify that NYS is pursuing a mission of broad-based career readiness, utilizing labor market alignment as a guideline for CTE program development primarily to reinforce real-world relevance of instruction and only secondarily as an explicit pipeline development strategy. This matters for 2 reasons (1) the dynamism of the labor market somewhat confounds efforts of teenagers to make fixed career plans, and (2) the concept of "tracking" young people into specific work and life paths is repellant to parents and policymakers.</p>	<p>Perkins V planning has given New York the chance to continue the conversations about serving the needs of all students that were begun during the development of the state’s Every Student Succeeds Act (ESSA) plan. The work done to define measures of success for the state ESSA plan marked a shift in thinking about setting meaningful educational goals for all learners. The broader view taken to define a well-rounded education has created natural points of contact and synergy to unite academic, technical, and social/emotional learning. The acquisition of competencies in these three areas is central to the purpose of Perkins V legislation and is found in its first sentence:</p> <p><i>The purpose of this Act is to develop more fully the academic knowledge and technical and employability skills of secondary education students and postsecondary education students who elect to enroll in career and technical education programs and programs of study. (Perkins V, SEC. 2. [20 U.S.C. 2301])</i></p> <p>The ESSA and Perkins V plans set the stage for developing a new definition of a “well-rounded education.” We seek to enrich the definition beyond achievement in narrow academic areas. The changing nature of work requires the CTE community to deliver programs that are a part of—not a substitute for— a well-rounded education.</p>
<p>NYSED CTE should provide curricular frameworks and templates aligned with existing standardized resources utilized by school districts and BOCES. The frameworks should include the alignment of technical and professional skills. See NYCDOE standardized supplemental resources. NYSED should identify the valued credentials that meet labor market demands and support students beyond high school by working across regional economic development councils (REDC) and consisting of local career pathway stakeholders (e.g. business, industry and postsecondary members) NYSED should utilize set aside funds to support the standardization and evaluation of fast track third-party</p>	<p>NYSED will convene advisory panels of educators and others from the CTE community to develop curricular frameworks. The first content areas under consideration are business and marketing education and work-based learning.</p> <p>Work on credentials of highest value will also be undertaken in collaboration with advisory panelists.</p>

<p>State Priorities for Perkins V</p>	
<p>developed programs for approval. The state should consider licensing/contracting these offerings to reduce the costs to LEAs/BOCES and require them to be audited or to reapply through statewide RFPs to ensure programs remain aligned to postsecondary degree pathways, as well as relevant to industry demand and employer needs.</p>	
<p>Use of Funds</p>	
<p>How were the 6 uses of Perkins funds determined? We don't understand how these 6 uses will be able to improve gaps identified in the 7 steps of the CLNA. It seems like we may need more flexibility in how funding is spent to address gaps.</p>	<p>The six uses of funds were determined by the Perkins V legislation in Section 135.</p>
<p>New Programs without NYSED Approval</p> <p>We are hoping that there are opportunities in the future for a set-aside of the allocation to be used on new programs in emerging fields.</p>	<p>The description of the local plan contents found in Sec. 134 charts the sequence for applicants must use to determine the use of funds. The legislation specifies that applicants must show:</p> <p style="padding-left: 40px;"><i>how the results of the comprehensive needs assessment described in subsection(c) informed the selection of the specific career and technical education programs and activities selected to be funded;</i></p> <p style="padding-left: 40px;">and</p> <p style="padding-left: 40px;"><i>a description of any new programs of study the eligible recipient will develop and submit to the State for approval;</i></p> <p>For secondary programs, this means that program approval comes first and the need for the program is borne out by the CLNA. To apply Perkins funds to programs, districts/BOCES must be sure that they have received their approval/re-approval letters by 11/1. Programs missing this deadline can secure approval in the next year and be assessed in an CLNA that will cover programs that were not included in the “regularly” scheduled CLNAs in the 2019-20, 2021-22, 2023-24 program years. This means that applicants can do a CLNA more often than every two years as specified in Perkins V.</p>

<p>How can Perkins funds be used to develop programs that align with labor market trends if recipients are not able to use their grants to develop new programs?</p> <p>If the CLNA determines a need in a region where there is no existing NYSED-approved program, can Perkins resources be used for development of a new CTE Program?"</p>	<p>The portion of Perkins that states pass through to local recipients (at least 85 percent of the state’s allocation) is governed by several federal definitions. All Perkins funds must be used on programs that meet the state’s definition of size, scope, and quality. This requirement is foundational to all other funding considerations in directing grant use.</p> <p>It is true that Section 135 of the legislation indicates that recipients “shall use such funds to develop, coordinate, implement, or improve career and technical education programs to meet the needs identified in the comprehensive needs assessment described in section 134(c).” But Section 135 also includes fund use requirements for recipients “to support career and technical education programs that are of sufficient size, scope, and quality to be effective” (Perkins V Sec. 135(a-b).</p> <p>It is permissible to use state leadership funds (10 percent of the state allocation) to “develop and implement programs of study aligned to State and local economic and education needs, including, as appropriate, in-demand industry sectors and occupations...” (Perkins V Sec. 124(b)).</p> <p>New York dedicates leadership funds to activities with statewide impact. Thus, leadership grant dollars fund a technical assistance center because it can provide the greatest range of opportunities to improve CTE program delivery statewide.</p>
<p>The Plan proposes issuing a new RFP to fund a Technical Assistance Center that will focus on ESSA related programming. We propose that the Plan include in this RFP programming that addresses postsecondary initiatives, as found under TRIO or similar supports of postsecondary students.</p>	<p>The next TAC will serve both secondary and postsecondary CTE.</p>
<p>Charter Schools</p> <p>We believe that charter schools in New York State should be eligible for Perkins V funding. As a high-performing, independent, community based charter high school in New York City, we have many students who would benefit from CTE training....Being able to provide our students with education and certifications in building trades, computer tech, and other CTE pathways would provide</p>	<p>NYSED-approved CTE programs are a part of a well-rounded education that offers students a graduation pathway option that is driven by their interests and connects forward to additional learning and career opportunities.</p> <p>Currently, no charter schools offer three NYSED-approved programs in three different career clusters—this is one of the eligibility requirements applicants must meet in order to be considered for Perkins funding. The CTE office has</p>

<p>them with additional career pathways and fill gaps in the workforce as well.</p>	<p>worked with Office of Charter Schools to provide information on the Perkins V eligibility criteria.</p>
<p>Middle School</p> <p>We believe that an early start to career exploration in the middle grades can empower students to start thinking about their future after high school, help them explore all the different options and pathways for postsecondary education and career.... Understanding the benefits of career exploration at a younger age, several states across the country are already planning to expand Perkins-funded career and technical education programming to middle school grades...We urge New York to join those states on the leading edge of college and career readiness in the 21st century....</p>	<p>New York is one of the few states that incorporates a middle-level CTE requirement for secondary students. The implementation of the new middle-level frameworks has generated interest in how to best update the required 1.75 units of study at the middle level. Since these units are required by the state, they may not be supported by Perkins funds as this could be considered supplanting of local funds with federal funds. New York will begin examining options that may allow Perkins funding to be used at the middle level in the future.</p>
<p>Dual Enrollment</p> <p>Localities should have flexibility to use a share of Perkins funds to support early college credit-bearing experiences aligned to CTE programs of study. In light of the research-validated importance of dual-enrollment opportunities for postsecondary degree completion and progress along a career pathway, CTE Perkins performance reports to NYSED should indicate the availability and uptake of these offerings.</p>	<p>Localities have this flexibility within the existing options of the secondary program approval process. Use of funds for this type of activity in an approved program is contingent on the CLNA findings and compliance with state restrictions [note: Article VIII of NYS Constitution, use of public funds for individual benefit].</p> <p>NYSED supports making dual enrollment opportunities more widely available. While Perkins V lists this as a permissible use (not required use of funds) in Sec.135 (b)(5)(S) that funds may be used for "support to reduce or eliminate out-of-pocket expenses for special populations participating in career and technical education, including those participating in dual or concurrent enrollment programs or early college high school programs, and supporting the costs associated with fees, transportation, child care, or mobility challenges for those special populations", NYSED's position is that utilizing the Perkins funds strategically on program improvement in order to have an impact on the greatest number of students is the best use of these limited federal resources.</p>
<p>Require Career and Financial Management</p> <p>NYSED should expand access to and consider requiring of all students for high school graduation, the CFM course or its modular components. All young people--not only those in CTE programs--would benefit from greater understanding ...of postsecondary education and training options, how to conduct a job search, and development of transferrable skills.</p>	<p>Implementing a CTE graduation requirement for all students is not within the purview of the Perkins V Plan. The New York State Board of Regents have begun a review of graduation requirements in discussions with stakeholders state-wide.</p>

<p>Can we serve non-matriculated students in postsecondary programs?</p>	<p>Generally, Perkins funding should support students matriculated in CTE programs at the institution receiving the Perkins funding. However, there are exceptions, such as funding devoted to recruiting students into CTE programs. Please make sure to consult a Perkins Grant Liaison regarding potential plans to make sure they are allowable before proceeding.</p>
<p>Will stipends be allowable in Perkins V?</p>	<p>In New York, direct payments or benefits to individual students are not allowable under the grant. Therefore, providing stipends to individual students is prohibited. However, in certain situations providing stipends to faculty, lecturers, and other individuals is allowable. Please consult a Perkins Grant Liaison regarding potential plans to make sure they are allowable before proceeding.</p>
<p>The Plan proposes the use of Perkins Leadership funds to support staffing in the Perkins program offices at the New York State Education Department (~ p. 17). We propose that the Department consult with the assigned Perkins program officer at the Federal level regarding the appropriateness of this fund use.</p>	<p>Neither the United States Department of Education, Office of Career, Technical and Adult Education grant monitoring visit nor a state A-133 audit found exceptions or issues with using Perkins leadership funds to support NYSED staff who provide technical assistance to recipients state-wide.</p>

<p>Performance Indicators</p>	
<p>Selection of Work-based learning as program quality indicator</p> <p>Although we agree with New York's decision to prioritize the work-based learning program quality indicator, we urge NYSED to additionally consider the percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant CTE programs. Other things being equal, postsecondary credentials are the strongest indicators of viability in the labor market and providing early support for low-income students in particular toward completing a degree.</p>	<p>If data on college credit earned by secondary CTE students in approved programs becomes available, NYSED would like to include this measure in a public report.</p>
<p>As the Executive Director of upstate New York's largest commercial construction industry association, I would like to provide some suggestions to better align NYS [CTE programming] to the indicators the CTE indicators construction industry employers prioritize....</p>	<p>New York's four-year Perkins Plan reflects how the state intends to carry out the purpose of the act, which is "to develop more fully the academic knowledge and technical and employability skills of secondary education students and postsecondary education students who elect to enroll in career and technical education</p>

<p>While academic achievement is an important aspect of any student's high school experience, construction industry employers believe an emphasis on these core CTE attributes provide students with the greatest advantages and career opportunities in today's competitive workforce environment:</p> <ul style="list-style-type: none"> Work Based Learning Career Ready Practices National Industry Assessments State Credentials: 	<p>programs...As New York's ESSA plan put forth, a well-rounded education includes a range of knowledge, skills, and abilities acquired in a number of settings, including CTE.</p> <p>Programs are developed at the district/BOCES level. The selection of the program content and culminating technical skills assessment is a local decision. No change is being contemplated for Perkins V implementation purposes.</p>
<p>Broaden program outcomes to include additional measures of program quality for funding eligibility (i.e., including dual/college credit, job/postsecondary placement, earning valued industry credentials). Districts and BOCES could then flexibly meet outcomes to serve all students, including those special populations that may require additional supports and services (e.g., students in temporary housing) rather than recognize outcomes that are not valued by industry or postsecondary institutions.</p>	<p>Performance outcomes reflecting achievement in literacy, numeracy, high school and post-secondary completion are common benchmarks used by employers across industries. States are permitted to add performance measures to those required by Perkins V, but they cannot substitute a measure they prefer for those defined by the legislation.</p>
<p>Perkins V Definitions and Procedures</p>	
<p>CLNA Guidance for [secondary programs] lists at least 54 hours of WBL as a performance indicator. Why are we using 54 hours? Is it so it aligns with CDOS? Based on the way WBL is described in the WBL manual and [in the Perkins plan] this is unrealistic for some programs and students. The Perkins Plan states that improving career development for all students is a priority and... it talks about quality WBL and the need for common measures to define WBL. Is the state defining WBL as attaining 54 hours?</p>	<p>Yes, the 54-hour requirement aligns this Perkins quality indicator with the number of hours needed to earn a CDOS credential.</p> <p>No, quality WBL is not defined as simply the completion of 54 hours. Beginning in 2020, an advisory panel and workgroup will focus on the development of measures of quality.</p>
<p>Will we be required to have a parent on our stakeholder list?</p>	<p>Federal legislation requires institutions to attempt to secure participation of all parties listed. Institutions should retain documentation of all such attempts.</p>
<p>Amend the NYSED CTE program approval/re-approval process in various ways.</p>	<p>It is not within the purview of the Perkins V plan to address the CTE program approval process described in CR 100.5.</p>
<p>How important are partnerships with local high schools/how heavily will they be weighed?</p>	<p>Perkins V legislation and New York State Perkins Grant Guidelines encourage partnerships between secondary and postsecondary institutions. High schools and colleges should work in cooperation with workforce/industry to create a continuum across all three groups.</p>
<p>The plan references "meaningful articulation agreements" as part of the definition of quality, but it isn't part of the</p>	<p>New York State's definition of program of study incorporates the federal requirements and has added</p>

<p>definition of a program of study which focus on credentialing. Are the requirements for being sufficient in size, scope and quality different than the requirements for a program of study?</p>	<p>other components to our definitions of size, scope and quality.</p>
<p>Timely award notification – it has been our experience that although projects are scheduled to begin on July 1 of each year, it is more often the case that our institutions do not receive their award notifications until mid-to-late fall. This delay negatively impacts the ability to implement new projects; thereby implementing our identified goals.</p>	<p>Depending on the condition of a given application when it arrives at NYSED and the quality and timing of the improvements, this process can take weeks or months. If institutions submit applications to NYSED that are not complete or are not in keeping with all federal and state guidelines, NYSED identifies the shortcomings and allows institutions the opportunity to make the necessary improvements to their applications. Oftentimes institutions submit revised applications that still do not fully meet the requirements, which necessitates further rounds of revisions and additional reviews at NYSED.</p>
<p>The Plan proposes the continuation of State-determined set-asides for assigning Perkins funds to serve special population category students at the postsecondary level (p. 56; D5). However, the Plan also acknowledges that “Local control allows institutions to tailor their programming, thereby maximizing the benefits to special populations and nontraditional students.” (~p. 18). We propose that, except where set-aside percentages or amounts are stated in the enactment, postsecondary set-asides established at the State level be eliminated.</p>	<p>During the 2021 Grant Year, NYSED issued only one set-aside requirement: institutions had to devote 5% of their total allocations to serving Students with Disabilities. The Office of Civil Rights at NYSED has reported a substantial improvement in services for this group over the last several years, resulting in many institutions that were delinquent in their efforts now meeting or nearly meeting OCR regulations. NYSED therefore intends to keep this set-aside in place for the immediate future.</p>
<p>The Plan proposes that State funds also support postsecondary career focused education. This includes grants to the state university and community college systems, state agencies, community organizations, and other providers to develop programs that help students graduate on time with an industry-recognized degree or certificate while preparing for careers that are in demand in their region. Some programs are offered through public/private partnership apprenticeship programs that generate new employment opportunities for community college graduates through newly registered apprenticeships, including paid-on-the-job skills training, a degree or certificate, and assistance in gaining full-time employment upon graduation (~ p. 8). It seems like the only Perkins eligible are those in an industry-recognized degree or certificate. We have our DSP apprenticeship program with WWAARC with students who will get apprenticeship within the six major industry groups, but they would be registered as LBAA majors. It would be</p>	<p>NYSED is currently limited to using the HEGIS Code system.</p>

<p>great if for those who are in registered apprenticeships, regardless of degree type, could count toward number of eligible students. This would require another mechanism beyond the HEGIS Code of 5000-5599, to support those seeking apprenticeship credentials, while enrolled at SUNY ADK for the related instruction. This related instruction could be credit or non-credit, or a combination.</p>	
<p>The second part of the planning process, which builds on and supports the first part of the process, the NYSED requires postsecondary institutions receiving Perkins funding to submit plans for the use of funds. It also requires that institutions integrate these plans into their institutional plans and into their participation on the Local Workforce Investment Boards (as enacted by Title I of the WIA). Further, the NYSED requires the postsecondary institutions to enlist the advice of their Local Advisory Councils (LACs) which include representatives of local businesses and industries and other concerned parties. This is to ensure the relevance of the funded activities to the needs of business and industry and to provide students with opportunities for technical employment in their areas of education....</p> <p>We need to have a streamlined way to use the One-Stops to help this process for the CLNA and future Perkins funding. WIB already has meetings and creating more meetings helps no one. I do not want to accede control of what we submit but let us not waste time. It would be great if the Plan allowed that and not intimate a separate LAC is required</p>	<p>The Local Advisory Council (LAC) requirement is not new; it has been in place for multiple iterations of the grant. The LAC plays a key role in facilitating communication between institutional administrators and local industry. It also serves as a key resource to the Grant Officer in the development of the Perkins Grant Application.</p>
<p>We propose that SUNY and CUNY central administrative offices be consulted to inform the Plan about how labor market data is used and integrated for CTE programming at the postsecondary level.</p>	<p>We welcome input from SUNY and CUNY as we finalize implementation of CLNA processes.</p>
<p>Tracking the “special populations” will be challenging, if not impossible (i.e.: McKinney-Vento Homeless Assistance Act, Youth who have aged out of foster-care, etc.) Of the new special population categories, foster children aging</p>	<p>Postsecondary institutions should begin assessing their current data collection procedures to evaluate a possible</p>

<p>out are not discussed in the draft. The references to homeless individuals appear in the context of secondary educational institutions and BOCES requirements. These are not data post-secondary institutions generally collect on students. How will post-secondary institutions be asked to address these special population.</p>	<p>means to identify these populations (e.g., FAFSA forms) this data in order to be able to report it to NYSED.</p>
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B. PROGRAM ADMINISTRATION AND IMPLEMENTATION

B1a Summary of workforce development activities in New York

Provide a summary of State-supported workforce development activities (including education and training) in the State, including the degree to which the State's career and technical education programs and programs of study are aligned with and address the education and skill needs of the employers in the State identified by the State workforce development board. (Section 122(d)(1) of Perkins V)

The state supports career focused education and training programs aligned with workforce needs in many ways and at many levels. At the secondary level, New York's state aid formula for education builds in support for CTE programs. New York provides increased funding for CTE programs through aid to Boards of Cooperative Educational Services (BOCES). The state provides Special Services Aid to the Big 5 Cities (i.e., New York City, Yonkers, Rochester, Syracuse, and Buffalo) and other non-component districts of one of New York's regional technical centers, the BOCES. This formula takes into account a measure of the district's wealth and the number of students participating in different CTE programs. The formula only considers CTE students in grades 10-12, and funds for students participating in trade, industrial, technical, agricultural or health programs at a higher level than for those participating in business and marketing programs.

Secondary agencies also receive state aid for programs that provide employment preparation for adult students with multiple barriers to securing and maintaining employment. These programs are provided concurrently with occupational training.

State funds also support postsecondary career focused education. This includes grants to the state university and community college systems, state agencies, community organizations, and other providers to develop programs that help students graduate on time with an industry-recognized degree or certificate while preparing for careers that are in demand in their region. Some programs are offered through public/private partnership apprenticeship programs that generate new employment opportunities for community college graduates through newly registered apprenticeships, including paid-on-the-job skills training, a degree or certificate, and assistance in gaining full-time employment upon graduation.²

Education Law §237 and L.1995 c.82: Requires the Board of Regents to create a detailed Statewide Plan for Higher Education that (a) defines and differentiates the missions and objectives of higher education; (b) identifies the needs, problems and interests that programs in higher education must address; (c) defines and differentiates the missions and objectives of institutions of higher education; (d) meets the needs and solves the problems, affects the conditions and respond to the public's interests; (e) optimizes the use of resources; and (f) evaluates program effectiveness.

New York State's workforce development activities are carried out by a network of regional and local assets. In a state as diverse as New York, a single model cannot adequately serve all regions. To accommodate the vast differences, the state defines broad priorities that regions carry out in ways that

² Workforce Development Catalogue of Funding, <https://data.ny.gov/Government-Finance/Workforce-Development-Catalogue-of-Funding/dew2-4qmw/data> accessed 9/12/19

make sense for local conditions. These regional efforts are shaped by stakeholders who are members of Regional Economic Development Councils (REDCs). The REDCs develop strategic plans with input from a broad spectrum of stakeholders. Strategic plans then serve as a road map for the local implementation of programs to improve economic growth and the quality of education and employment opportunities available. REDCs partner with supporting organizations and private sector partners to develop their region's economic development strategic plan. A range of workforce development experts serve on planning committees to ensure that existing educational and technical skills development opportunities match state and regional needs. Planning committee members include representatives from:

- Economic Development, from a local employer, industry group, or Empire State Development;
- Higher education,
- Local Workforce Investment Boards and Career Center partners; BOCES; and
- Empire State Poverty Reduction Initiative representative from the region.

REDC strategic plans use a sector-based approach that outlines the local continuum of career education and employment opportunities. Essentially, the plan crosswalks the types of CTE programs available and the types of skills required by area employers. This strategic plan is used by Local Workforce Development Boards (LWDB) in consultation with the New York State Department of Labor (NYSDOL) to operationalize REDC recommendations. These local plans further refine workforce priorities specific to the area to better match local needs at the occupational and economic sector levels.³

Statewide Significant Industries

Significant industries are identified by the NYDOL on the basis of job counts, wage levels, job growth, and expected job growth based on industry employment projections. Priority industries also may be designated as such by economic development or workforce development plans for growth.

NYSDOL designates 13 statewide industries as “significant.” They fall into six major industry groups:

1. construction;
2. manufacturing;
3. financial activities;
4. professional and business services (which primarily sell to other businesses);
5. educational services; and
6. health care.

The majority of secondary CTE programs deliver technical content that is aligned with New York's most important economic sectors (as identified in the NYSDOL [Labor Market Information for Workforce Planning](#) data). The majority (approximately 80%) of CTE programs align with the state designated significant industrial groups.⁴

³New York State Workforce Development Initiative, <https://www.ny.gov/workforce-development-initiative/workforce-development-initiative-process#regional-workforce-strategies>

⁴ Source: CTE Office approved program data, accessed 9/11/19

	Counts of approved secondary CTE programs by New York State significant industries: 2019								
	Construction	Manufacturing	Financial Activities	Health Care	Professional and Business Services	Educational Services	All Other Approved	total	% in alignment with significant industries
Region									
Big 5 City	25	35	21	26	66	2	49	224	78.13%
Capital District	11	17	15	6	38	5	14	106	86.79%
Long Island	16	9	20	18	58	7	28	156	82.05%
Lower Hudson Valley	16	10	2	7	25	4	22	86	74.42%
Mid-Hudson	9	10	3	8	36	6	22	94	76.60%
Mid-South	7	8	6	6	32	3	14	76	81.58%
Mid-State	6	9	7	5	39	9	12	87	86.21%
Mid-West	10	13	11	9	31	6	12	92	86.96%
North Country Mohawk	14	14	8	10	44	8	27	125	78.40%
West	11	14	16	10	41	6	20	118	83.05%
TOTALS	125	139	109	105	410	56	220	1164	81.10%

As required by the Workforce Investment and Opportunity Act, local workforce boards must focus resources on local priority industries (and eventually on priority occupations within those industries).⁵ In addition to state-level industry sector data, NYSDOL's Division of Research and Statistics provides reports on industries identified as "significant" at the local level.⁶

Data showing alignment of approved CTE programs with regional industries of significance is not available. Since the approval process requires input from local business there is some assurance that business and CTE partners work to develop programs that are tied to local economic sector and labor market conditions. For example, although manufacturing employment has been contracting statewide, the western part of the state is seeing an increase in the number of employees needed in advanced manufacturing. These opportunities are the result of an aging workforce in this sector and region. The local workforce investment board began an initiative with public and private partners to grow local talent in advanced manufacturing, a NYSDOL designated priority industry. The initiative led to the

⁵ United States Department of Labor: WIOA Overview, <https://www.doleta.gov/wioa/about/overview/> (accessed 9/12/19)

⁶ For a sample report, see New York State Department of Labor Research and Statistics, <https://www.labor.ny.gov/stats/cap/index.shtm> (accessed 9/12/19)

creation of Finger Lakes Advanced Manufacturing Enterprise ([FAME](#)). This consortium of 62 employers, 10 BOCES and colleges, and 9 workforce development agencies have developed advanced manufacturing career programs grounded in an industry commitment to provide work experience and job placements for students.

Alignment of the postsecondary non-credit certificates or credentials to regional need is fostered through the REDCs' identification and creation of "in-demand industry" lists. These regional lists guide the development of credential training programs appropriate to current or projected industry need. Actionable labor market information is being deployed more effectively by the key economic development, workforce development, and education entities in New York⁷

New York State funds many workforce development initiatives to provide career training tailored to regional needs. These programs serve adults, out-of-school youth, and other groups of CTE students. Recent projects led by NYSDOL in partnership with other entities include:

Program	Region	Partner
CTE Health Careers program	Capital Region	Capital Region BOCES
Craft Brewing Science and Service Centers Skills Training	Western New York	Erie Community College
Direct Support Professional Training	Finger Lakes	Rochester School of the Holy Childhood, Inc.
Green Construction Skills Training	Long Island	United Way of Long Island
Manufacturing Basics Certification Program	Southern Tier	Broome Community College
Young Adult Food Sector Employment Initiative	NYC	Queens Community House, Inc.
Nurse Assistant Training	Mid-Hudson	Ulster BOCES

⁷ WIOA State Plan for the State of New York FY- 2018, www2.ed.gov/about/offices/list/osers/rsa/wioa/state-plans/ny.pdf (accessed 9/15/19) p. 67

B1b State’s Vision for Education and Workforce Development: Strategic Vision and Goals

Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V)

New York State’s vision for workforce development prioritizes building partnerships to create a continuum of career options that begins with middle and high school career exploration and continues on to postsecondary concentration in an occupational area, technical skill training, and employment. This continuum brings government, education, and business together to form a workforce system that meets the needs of learners and employers.

The state’s vision for educating a skilled workforce through career and technical education begins in P-12 classes in the form of career awareness through exploratory courses and experiences. Elementary courses infuse the Career Development and Occupational Studies (CDOS) standards⁸ into their instruction of core academics. By the middle level, students are formally introduced to the world of work through the state-required 1.75 units of CTE such as the [“Introduction to CTE”](#) coursework that is structured by theme and content modules developed by middle-level CTE educators. State-approved CTE programs at the secondary level mark the next point in the CTE education continuum. NYSED-approved programs provide high school students the chance to obtain in-depth knowledge, skills, and experience in a career area. The mission of the New York State Board of Regents “...to ensure that every child has equitable access to the highest quality educational opportunities, services and supports in schools that provide effective instruction aligned to the state’s standards... so that each child is prepared for success in college, career, and citizenship” calls on the New York CTE community to join in this endeavor: *that all learners have access to high-quality Career and Technical Education opportunities that are equitably and deliberately integrated at all educational levels to better prepare New York students for lifelong learning and career success.*

In order to move toward this shared vision, the state has established a set of priorities which provide a framework for strategies to be implemented over the course of this Four-Year Plan:

1. *Increase access to high-quality CTE programs*
2. *Support at-risk CTE students*
3. *Build regional collaboration – secondary and postsecondary with business and industry grounded in labor market needs—to facilitate the development of regional programs of study, including regional articulation agreements*
4. *Improve career development for all students*

⁸ Standard 1. Career Development: Students will be knowledgeable about the world of work, explore career options, and relate personal skills, aptitudes, and abilities to future career decisions.

Standard 2. Integrated Learning: Students will demonstrate how academic knowledge and skills are applied in the workplace and other settings.

Standard 3a. Universal Foundation Skills: Students will demonstrate mastery of the foundation skills and competencies essential for success in the workplace.

and,

Standard 3b. Career Majors: Students who choose a career major will acquire the career-specific technical knowledge/skills necessary to progress toward gainful employment, career advancement, and success in postsecondary programs.

The state’s network of BOCES is well positioned to adapt to changes in labor market. The close coordination of education and industry professionals fosters the development of programming in emerging fields such as nanotechnology which train talent for the state’s growing high-tech economy. When the gas drilling industry experienced a rapid expansion, BOCES developed “just-in-time” programs to meet this specific industry’s needs. In 2017, business participation on BOCES advisory councils resulted in the development of more than 80 new career programs aligned with regional industry needs in existing and emerging fields. Each year, approximately 5,000 businesses serve on CTE advisory councils to inform program decisions. Typically, over 37,000 secondary and 20,000 adult students participate in CTE and workforce development programming each year.⁹

Occupational projections from the NYS Department of Labor indicate there will be 3.6 million job vacancies in New York between 2014 and 2024 as a result of new jobs (i.e., growth need) and openings from retirements and career changes (i.e., replacement need). Over a third of these available vacancies will require some type of formal education beyond high school, with 335,000 of these jobs available for those who fall into the “middle skill” category. This is approximately 10,000 more openings than those that will, in total, require a bachelor’s, master’s, or doctoral-level degree.¹⁰

Since many future occupational fields will require some type of formal education beyond high school, secondary CTE programs necessarily connect forward to the next level of opportunity in education, specialized training, or employment. The CTE continuum extends beyond high school, frequently to one of the 30 community colleges in state. The community college serves as an agile regional partner in providing education and professional development tailored to local needs. In addition, the community colleges support and collaborate with the numerous economic engines within the state for economic development purposes. There are over 170 occupations that are eligible for NYSDOL registration as an apprenticeship program. Emerging industries have relied on secondary and postsecondary level CTE program developers to build programs to provide students with needed skills. These programs can also include articulation to a NYSDOL registered apprenticeship because employers in emerging occupations can apply to register new categories of skilled occupations. (e.g., Outsourcing (Compounding) Pharmacy Technician).

In addition to federal Perkins and WIOA funds, the NYS budget provides \$175 million in workforce development investments to further the goals of:

- improving regional talent supplies through stronger ties between CTE programs and area industry sectors;
- expanding apprenticeships and other on the job training options;¹¹

⁹ Boards of Cooperative Education of New York State, <https://www.boces.org/about-boces/>, accessed 9/19/20

¹⁰ NYS Department of Labor Employment Projections, “Long-Term Occupational Employment Projections,” <https://www.labor.ny.gov/stats/lproj.shtm>, accessed 9/19/19

¹¹ For example, Onondaga-Cortland-Madison (OCM) BOCES has a two-year course in Media Marketing Communications that is embedded in WCNY, a public broadcast station in downtown Syracuse. Juniors and senior OCM students work side-by-side with WCNY staff on projects involving TV, radio, social media, web and print platforms. They also earn up to 18 college credits through on-site instruction from Onondaga Community College.

- addressing regional workforce needs through a system of flexible and responsive workforce entities;
- anticipating the long-term needs of growing industries—with a particular focus on emerging fields like clean energy, health technology, and computer science; and
- Supporting programs to improve the economic security of women, youth, and other populations that face significant barriers to career advancement.¹²

B1c Strategy for Joint Planning

Describe the State’s strategy for any joint planning, alignment, coordination, and leveraging of funds between the State’s career and technical education programs and programs of study with the State’s workforce development system, to achieve the strategic vision and goals described in section 122(d)(2) of Perkins V, including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and the Higher Education Act of 1965. (Section 122(d)(3) of Perkins V)

Planning and coordination of career and workforce development services begins with the New York State Regional Economic Development Councils (REDCs), which establish the broad themes for local workforce and community development activities. Council membership includes local experts and stakeholders from business, education, local government, and non-governmental organizations whose work focuses on competitively funding a range of projects to advance high-level priorities such as workforce development, downtown revitalization, and regional business incubators.

Local One-Stop activities are developed and coordinated by an interagency team that operationalizes New York’s WIOA state plan. This team consists of staff from the NYSDOL; NYSED; Office of Children and Family Services; New York State Commission for the Blind; New York State Office for the Aging; the Office of Temporary and Disability Assistance and postsecondary Perkins recipients.

Each program year the implementation strategies developed by these partners is carried out at the local level in the development sector-based workforce strategies that align with REDC priorities. Sector-based workforce strategies build partnerships of businesses, training providers, community organizations, and other key stakeholders around specific industries to address the workforce needs of businesses and the training, employment, and career advancement needs of workers. The NYSDOL [provides labor market information designed](#) to assist in the development of sector strategies that anticipate needs of workers and employers in existing and emerging occupational areas.

The regional framework guides planning done by local One-Stop partners led by the NYSDOL.

Coordination among agencies implementing state and federal career related education and employment programs occurs across the CTE continuum in programs serving high school students, out-of-school

¹² New York State Regional Economic Development Council Guidebook, <https://regionalcouncils.ny.gov/sites/default/files/2019-04/2019REDCGuidebook.pdf>

youth, adults lacking a high school diploma, college students, and displaced workers in need of upskilling.

At the secondary level, New York’s Perkins and ESSA plans share common goals. Providing all students access to a “well-rounded education” is the foundational theme in New York’s ESSA plan. The definition of a well-rounded education considers more than the core academics that organized state priorities during implementation of No Child Left Behind. The new definition of a well-rounded education in New York now includes “a robust array of courses, activities, and programs in visual and performing arts; science, technology, engineering, and math (STEM); humanities; civics and government; economics; computer science; career and technical education; health and wellness; and physical education.”¹³ The New York State ESSA accountability framework includes a College, Career, and Civic Readiness Index as a measure of school quality and student success. This measure gives additional credit for students who achieve beyond minimum requirements. In this index, successful completion of a NYSED-approved program is given the same weight as attainment of a Regents Diploma with Advanced Designation, and other academic achievements. The use of a College, Career, and Civic Readiness Index places value not only on the mastery of content knowledge but also the application of that knowledge in a productive way. In CTE, success is measured by more than seat time. The state ESSA accountability and support system raises the profile CTE achievements and makes possible school improvement plans that incorporate CTE-based strategies to address achievement gaps.

Our ESSA plan recommends that schools “include meaningful opportunities very early on during the high school experience for students to learn about themselves and their interests, strengths, needs, resources, and aspirations.”¹⁴ Preparing students to graduate *to something*, instead of *from something* is a foundational value of CTE instruction. New York will explore ways to join ESSA and Perkins initiatives to infuse more career-based learning experiences for students of all ages.

The NYSED will be issuing an RFP for a career and technical education technical assistance center (CTE TAC) that will build upon the gains made by the current CTE TAC. One priority area for the next CTE TAC will be to find ways to base service delivery on ESSA data. The Perkins V CTE TAC initiatives will include local and regional support to districts or schools that have been identified for Comprehensive Support and Improvement or Targeted Support and Improvement in the ESSA accountability results.

Other likely intersections of Perkins V and ESSA work will be in two additional ESSA areas.

[Title I, Part D](#), which provides supplemental educational/transitional services to students in residential facilities across New York State. ESSA requires every Local Educational Agency (LEA) to designate a Transition Liaison to facilitate a student's educational transition into, out of, and between facilities and academic settings. NYS’s ESSA Plan defined a number of steps intended to improve these transitions. The first was to convene staff involved with court-involved youth from the NYSED and Office of Children and Family Services to identify priorities and policy recommendations. The CTE Office participates in this workgroup to develop a state transition implementation plan.

¹³ New York State’s Final Every Student Succeeds Act (ESSA) Plan Summary: January 2018 accessed 9/12/19 <http://www.nysed.gov/common/nysed/files/programs/essa/nys-essa-plan-summary.pdf>, p.51

¹⁴ Revised State Template for the Consolidated State Plan the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act, www.nysed.gov/common/nysed/files/programs/essa/nys-essa-plan.pdf, January 2017, accessed 9/12/19, p. 127

[Supporting Students with Disabilities](#): The New York State ESSA plan supports effective transition practices throughout a student’s educational experience. This emphasis on coordinated transitions directly aligns with the Department’s initiatives in transition planning for students with disabilities under the Individuals with Disabilities Education Act (IDEA).

Intersections with WIOA programs will take place primarily in the youth programs.

[WIOA Youth Programs](#). While Perkins funds are allocated to serve court-involved students in residential placement, no specific projects exist to address the needs of out-of-school youth. We will explore ways Perkins leadership funds might support state-wide initiatives that strengthen WIOA youth programs through closer work with NYSDOL’s Program Development Office, which is responsible for oversight WIOA youth programs and coordinating with other youth-serving state agencies (i.e., NYSED, OCFS, and OTDA).

B1d State Leadership Fund Use

Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of Perkins V for each of the purposes under section 124(a) of the Act (Section 122(d)(7) of Perkins V)

In order to properly administer Perkins and associated activities, NYSED will continue to use leadership funds to staff P-12 and postsecondary offices administering the grant. In addition to backfilling existing and anticipated vacancies caused by retirements, the offices administering Perkins V anticipate approval for four new staff positions. Staffing these positions will improve NYSED’s capacity to develop Perkins V implementation guidance, as well as provide technical assistance in CTE content and data reporting to the field. The NYSED will continue to use leadership funds to operate a CTE TAC to provide professional coaching and support to the CTE community to create better CTE opportunities for all learners. The focus of the services provided by the CTE TAC will be aligned to the four established priorities.

A common theme in much of the stakeholder input received in summer forums related to the high value the field places on standardized content, expectations, and reporting in work/career-based experiences specifically, but also in program content in general.

Meetings held with professional CTE organizations generally included some type of request for tools, content framework, templates, etc. that would standardize program delivery and grant implementation to a greater degree statewide. In New York State, local control provides districts freedom to meet state learning standards in ways that are appropriate for their area. But local control is not always beneficial at the instructional level because it promotes unnecessary and duplicative efforts to develop CTE (and other) program content.

The meetings with CTE practitioners revealed great interest in creating some level of standardization in certain areas. Areas suggested for initial review include:

- developing statewide curriculum frameworks to ensure all students receive instruction in agreed-upon core areas, with some instructional time left for local modifications (e.g. [Theme and Content Modules](#) for middle level instruction, [or Career and Financial Management](#) curricular framework);

- using prior BOCES statewide assessment project as a foundation for standardized core curriculum modules;
- regional workshops offered by CTE content area with industry personnel and statewide craft committees to lift the burden from local program developers; and
- standardization in any of the components of CTE instruction to support CTE teachers who are singletons in their district.

Based on the above, NYSED will convene advisors to define the types of state-level frameworks and templates that will best support the implementation of Perkins V activities like

- work-based learning;
- core curriculum development for targeted programs; and
- industry practitioner and employer led professional development; advisory activities.

Consistency in core program content through standardized curricular frameworks will contribute to statewide articulation agreement development efforts.

At the college level, local control allows institutions to tailor their programming, thereby maximizing the benefits to special populations and nontraditional students. Postsecondary Perkins IV state policies requiring institutions to target at least some funding toward serving the students with the greatest need has prepared recipients to direct funds in a manner consistent with the Perkins V CLNA-determined fund use.

As two of the previous six Core Indicators focused on Nontraditional students, and one of the current three Core Indicators focuses on nontraditional students, the postsecondary Perkins office has and will continue to emphasize the importance of serving this essential group of students. Postsecondary recipient institutions must devote a significant portion of their funding to serving nontraditional students. In addition, NYSED contracts with the Nontraditional Employment and Training (NET) Program, located at the University at Albany. This group provides technical assistance to the Office of Postsecondary Access, Support and Success as well as the institutions. Over the last several years the group has provided many hours of research-based guidance to institutions regarding how they can improve their nontraditional student recruitment, retention, completion, and placement efforts.

NYSED encourages institutions to take advantage of professional development opportunities within the United States when they offer information or training that professionals can then pass down to CTE students. The Perkins postsecondary office holds annual conferences focused on serving new grant officers and on best practices. The office also occasionally offers webinars on legislative updates, data collection, etc.

NYSED Perkins program administrators provide technical assistance to grant officers at recipient institutions on an ongoing basis. Further, the NET Program administrators provide technical assistance regarding nontraditional student recruitment, retention, completion and placement.

B2 a. Implementing CTE Programs and Programs of Study

Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of

*study to be developed at the State level and made available for adoption by eligible recipients.
(Section 122(d)(4)(A) of Perkins V)*

New York's state developed CTE programs of study are in the health sciences and appearance enhancement occupations.

The New York State Department of Health and Education Departments carry out required activities to align nurse assisting (NA) and home health aide (HHA) programs with state and federal regulations. NA and HHA programs in the secondary, adult, and college settings use state-developed curriculum and must meet state operational approval criteria for classroom and competency evaluation program components.

State determined content and program design standards (in areas such as staffing criteria for classroom and supervised clinical experiences, clinical affiliation agreements, facilities, etc.) ensure state-wide consistency in the delivery of these high demand programs.

State programs in appearance enhancement (i.e., cosmetology, barbering, esthetics, natural hair styling, and nail specialty) operate at the secondary and adult levels. Program content is set by state regulations and laws (see 19 CRR-NY 162 NY-CRR). NYSED oversees and supports operational approval of these programs. Successful completers of these programs are licensed by New York's Department of State..

Initial consultation with stakeholders representing well over half of the state's student population (i.e., NYC, Buffalo, Yonkers, Utica, Newburgh, several BOCES across the state) did not result in uniform agreement. The most prominent concerns were on-going financial commitment to third-party vendors, true levels of instructional support available after the first year, and fidelity of implementation. There was more agreement around provision of curricular frameworks to outline broad content areas that would be used as a starting point for local delivery. Third-party developed programs that best serve state priorities may still be identified as an option for a fast track" to CTE program approval.

Instead, CTE practitioners and administrators suggested a middle ground approach to standardize procedural requirements and expectations for program content to provide more consistent programming statewide. Local control may determine content refinement particular to the region. Standards and technical skills in a career cluster, however, are driven by industrial sectors at the state and national level.

Advisory panel and professional organization members proposed that state-level templates and frameworks be developed in the following areas:

Standardize

- curricular frameworks and assessments, with possible addition of state-directed development of end of program CTE assessments
- work-based learning core curriculum, mentor training, program modules
- academic integration modules

Regionalize

- business advisory activities, internship placements, curriculum update to industry standards in a way the benefits the entire region, not individual program providers
- articulation agreements to benefit multiple secondary CTE programs

Additionally, advisory panel members urged collaboration with college programs that offer WBL certification extension programs to update content of the courses where needed

Duplication of effort is a frequent by-product of a local control model. Eliminating some redundancy would free up time to monitor student progress and focus on instructional approaches to meet individual student needs. NYSED will continue work with the advisory panel to identify which program areas and procedures should be evaluated for revision and consolidation.

B2b i. Program Approval Process

Describe the process and criteria to be used for approving locally developed programs of study or career pathways (see Text Box 3 for the statutory definition of career pathways under section 3(8) of Perkins V), including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132¹⁵ will—

promote continuous improvement in academic achievement and technical skill attainment;

The process used for approving secondary CTE programs in New York was launched in 2001 as a way for students to complete programs of study while satisfying new graduation requirements that decreased the amount of time available to concentrate in a CTE content area. The Board of Regents CTE program approval policy also put in place a framework for continuous improvement with each application for program re-approval. The process identified components of quality CTE programs for continual review and alignment with industry standards. These components are:

- *Opportunity to apply academic concepts to real-world situations:* The program approval policy increased the availability of integrated academics in CTE programs, which solved the problem of inadequate time in student schedules to accommodate the half-day programs offered at technical centers. Schools and BOCES that have NYSED-approved CTE programs can offer students up to eight units of integrated academic credit through the approved program. According to Commissioner’s Regulation 100.5, an integrated CTE course combines CTE and academic commencement level learning standards and may be jointly

¹⁵ [OCTAE note: Based on the context of this requirement, the reference to the local application process under “section 132” appears to be a typographical error in the Perkins V statute. The correct section for local applications in Perkins V is section 134. Therefore, eligible agencies should respond to this item using the provisions in section 134 of Perkins V.]

developed and taught by an academic subject teacher and/or a CTE teacher. Successful completion of one unit of study in an integrated CTE course may be awarded only one unit of credit but may be used to meet the distribution requirements in more than one subject. For details on this option, please see [Commissioner's Regulations 100.5\(d\) \(6\) Diploma Requirements](#) and [Expansion of Integrated Credits in Approved CTE Programs](#).

- *Preparation for industry-based assessments or certifications:* Technical assessments offered by approved programs usually have a written and a performance component where students demonstrate physical skills and/or produce a culminating project. All approved CTE programs must include a technical assessment that is nationally recognized and based on industry standards.
- *Work-based learning* opportunities for students to practice employability and technical skills in a real-world setting.
- *The opportunity to earn college credit* or advanced standing while still in high school is built into an approved program through the requirement for an articulation agreement with a postsecondary entity offering certification, apprenticeship, or college degree programs in technical content areas.

The approval process addresses needs of workforce development by requiring industry and postsecondary partnerships to guide program development. Programs applying for approval must convene a planning group represented by a number of stakeholders that mirror the composition of existing local advisory councils (LACs) required by state law. LACs must consist of at least ten members who cannot be employees of the agency(ies) served by the LAC. Further, the LAC membership must include, but not necessarily be limited to, representatives of each of the following:

1. persons familiar with the CTE needs and problems of management and labor in the service area;
2. persons familiar with programs of CTE at the secondary, postsecondary and adult levels;
3. persons familiar with the workforce needs and requirements of the community to be served;
4. persons familiar with the special educational needs of individuals with disabilities;
5. persons representative of community interests, including persons familiar with the special needs of the population to be served; and
6. persons enrolled as CTE students at the agency served by the LAC.

The self-study review, required for all approvals and re-approvals, is done by a team comprised of business, industry, labor, academic, and postsecondary advisors who participate in the review of the CTE program of study including content, course sequence, instructional setting, and equipment to ensure that there is alignment with industry standards, expectations, and trends. These partners validate the appropriateness of the program's academic and technical content and employability skills in providing students with the skills and knowledge required for entry into industry and/or post-secondary education.

Steps of the CTE program approval process to promote program improvement

Completing the program approval and subsequent reapproval process typically takes at least one year. Applicants must show that they have conducted a series of reviews and revisions which include:

1. conducting the CTE self-study
2. conducting the external review

3. processing all modifications necessary as the result of the external review
4. obtaining the chief administrator's and Board of Education president's certification on the application
5. completing the application for program approval and submitting it to the NYSED

Prior to application submission, self-study and external review committees will have reviewed the program in its entirety to ensure quality in all program components. After five years, an application for reapproval must be submitted. The program re-approval process is the same as first-time approvals, except returning programs must report data about program performance for the previous five-year period.

The NYSED CTE application review is performed by content specialist associates who review CTE program of study applications in their respective areas to ensure program elements include:

- An appropriately certified CTE teacher
- A self-study, with justification of the program in terms of local and statewide workforce development data
- Instruction on career development and employability skills¹⁶
- A meaningful, non-duplicative sequence of courses that increases in specificity from all aspects of an industry to more in-depth studies
- Access to work-based learning opportunities for all students
- Data reporting procedures and the CIP code alignment with program content
- An employability profile for 21st Century skills and technical skills in the appropriate content area
- A technical assessment that is designed to assess all areas of the program. In New York, all assessments must include a written component, a performance component, and a locally developed portfolio of projects and experiences completed within the program.
- An external review of the program by outside persons
- Signatures indicating support of the program from district administration

When carried out with fidelity, the initial program approval process builds course sequences of increasing complex academic, technical, and process skills. The creation of the CTE graduation pathway option in 2015 permits students to use successful completion of an approved program to meet graduation requirements.

Programs are required to obtain re-approval every five years. At this time, student completion and technical assessment performance rates are evaluated. Plans are put into place when necessary to support deficiencies in academic growth and achievement. In addition, content area associates, supported by the contracted CTE TAC, design and deliver targeted professional development opportunities to assist teachers in raising the rigor and relevance of their programs.

The original program approval process created a process for re-approval that is almost identical to the initial process. Inclusion of CTE pathways as an option to meet graduation requirements points to the need to review standards for re-approval decisions. With the addition of the comprehensive local needs

¹⁶ In New York, this is done through a required half-unit (at a minimum) course called Career and Financial Management. Local education agencies may elect to embed this content throughout their course content, or they may present the course content under a locally developed course name.

assessment (CLNA), each eligible recipient will be reviewing the quality of their programs of study, at minimum, every two years. This will provide an opportunity to assess the quality of programs on a more regular basis. Because of the inclusion of the CLNA, in the upcoming years, NYSED will consider streamlining the re-approval process by more clearly defining performance expectations. Questions for consideration with our stakeholders include:

- What benchmarks for success should all students in NYSED-approved be expected to achieve?
- What documentation of instructional goals and approach should be expected of CTE teachers?
- How might current CTE programs be modified so that course sequences challenge students with increasingly complex content?
- What additional information do NYSED program reviewers need to determine if program implementation addresses the needs of all learners?

Before a postsecondary institution can offer a college program, it must obtain approval by the NYSED. Postsecondary CTE programs are reviewed by the Office of College and University Evaluation (OCUE) through the Inventory of Registered Programs (IRP) process described below. Non-credit bearing programs are reviewed by the postsecondary Perkins program administrators.

Colleges seeking program approval submit to OCUE applications that describe the content of their programs and propose corresponding HEGIS codes according to the [Commissioner's regulations 52.1 Registration of postsecondary curricula](#). Programs approved for CTE include HEGIS codes ranging from 5000.00 and 5599.00; some of the more common programs include nursing, veterinary sciences, hospitality, and criminal justice. OCUE then verifies that the proposed HEGIS codes align with the content that the institutions have proposed. If the OCUE determines that the HEGIS code suggested by the institution does not align properly with the applicable content, OCUE proposes a more appropriate HEGIS code. OCUE reviews the codes of other registered programs in similar areas and at the same levels of study, to ensure consistency of HEGIS codes across institutions and programs.

Additionally, the NYSED assists colleges in the establishment and maintenance of quality CTE certificate and associate degree programs through required planning and evaluation activities. This is done through a two-part process.

In the first part of this planning process, the NYSED mandates that postsecondary institutions engage in institutional planning. The mandatory institutional planning process requires that every four years, an institution re-examine its vision, mission, and goals in the context of the State's foci and institutional needs and modifies these as necessary. The institution also must develop comprehensive, long-term strategies that are appropriate to the institution and the region it serves. Part of that process entails obtaining advice and feedback from business and industry, the professional accrediting bodies overseeing the licensure-qualifying programs offered, and the community at large. A goal of the process is to ensure that the programs, courses, and services offered remain relevant to available occupational categories and employment patterns students will face upon graduation. If the institution discovers shortfalls in this self-examination process, it is expected to modify its plans and strategies accordingly.

In the second part of the planning process, which builds on and supports the first part of the process, the NYSED requires postsecondary institutions receiving Perkins funding to submit plans for the use of funds. It also requires that institutions integrate these plans into their institutional plans and into their participation on the Local Workforce Investment Boards (as enacted by Title I of the WIA). Further, the NYSED requires the postsecondary institutions to enlist the advice of their Local Advisory Councils (LACs) which include representatives of local businesses and industries and other concerned parties. This is to

ensure the relevance of the funded activities to the needs of business and industry and to provide students with opportunities for technical employment in their areas of education. The NYSED evaluates the effectiveness of the plan and requires modifications as appropriate. This evaluation process will continue and will be modified as needed to support the goals of the Perkins legislation.

Institutions that offer noncredit bearing programs must describe in their local applications how their programs meet the definition and standards for CTE. These justifications are then reviewed for approval by Perkins program administrators at NYSED.

Postsecondary Perkins creates a list of eligible institutions based on the following criteria:

1. Minimum of 5 approved CTE programs;
2. Ability to generate a minimum of \$50,000 in formula funding on their own or by partnering with another institution in the form of a consortium; and
3. At least one approved program that meets the federal definition of Program of Study.

Since 2006, the NYS Education Department Postsecondary Perkins Program Office has restricted the eligible institutions to those with a minimum of 5 approved CTE programs.

Postsecondary Perkins requires institutions to describe in the Major Effort Formats or the narrative section of the local application how they promote continuous improvement in academic achievement, expand access to career and technical education for special populations, and support the inclusion of employability skills. In the Major Effort Formats/narrative, institutions must present clear goals, focused on program improvement and meeting the core indicators of performance. Programs must demonstrate continuous improvement in academic achievement and technical skill attainment through the activities and expenditures described in their local applications.

B2b ii. Expanding Access to CTE for Special Populations

ii. expand access to career and technical education for special populations; and

The NYSED plans to continue work on expanding access to CTE for special populations by beginning with an inquiry into the nature of the existing barriers to participation and successful completion. New York's recent efforts to better understand barriers to CTE faced by students with disabilities and English language learners included allocating state funds for 12 projects to learn what remedies might improve access. Priority areas identified by these projects include:

New teacher certification and use of certification extensions for existing teachers (e.g., math teacher instructors obtain bilingual certification extension).

Accommodation of social-emotional issues *and need for* professional development for instructional and counseling staff on national policy developments affect the mental health of immigrant students.

Outreach to CTE programs serving large numbers of special populations showed general agreement that most significant barriers CTE practitioners face are:

- supporting general education students who may have disabilities but are not identified or who has been declassified;
- equipment to accommodate a range of needs;
- availability of translated materials; and
- support for CTE teachers in understanding ELLs academic levels to set an attainable bar for success.

Moreover, through the analysis of local data in the CLNA, all local recipients will examine gaps in the representation of students in all special populations, not just those studied in the above-mentioned pilots. Local recipients will be required to address the most significant gaps by implementing strategies to improve access to and success in programs

B2biii. Inclusion of Employability Skills

iii. Support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V)

The acquisition and practice of employability skills is a priority in New York's approved secondary CTE programs. Applicants seeking CTE program approval must develop employability profiles that relate specifically to their CTE program of study and that include both technical and employability skills aligned to the expectations of future employers and post-secondary partners. Employability profiles for 21st century skills are developed using the 21st Century Skills Framework. Employability profiles for technical skills are built using industry-specific standards in that area of study. Knowledge and skills on employability profiles must also align with student IEP/504 plans. Applicants must also develop a process that will be used to review and update each student's employability profile.

Additionally, programs seeking approval are required to offer a Career and Financial Management (CFM) course either as stand-alone or as integrated content. NYSED provides a [curricular framework](#) for CFM that outlines the topics that should be covered. The framework connects modules to related New York State CDOS standards and the Common Career Technical Core Career Readiness Practices. The career management modules provide an instructional framework for employability topics including:

- Career Development
- Options Beyond High School
- The Job Search Process
- Workplace Regulations
- Career Readiness Skills (Transferrable Skills)
- Lifelong Learning
- Leadership and Ethics
- Business Communications & Technological Innovations

Modules are grounded in essential questions about employability topics and student activities designed to demonstrate skills. For example, the module dedicated understanding and developing career readiness skills outlines instructional topics covering:

1. *Career Readiness Skills (Transferrable Skills) Students will:*

- a. *Identify career readiness skills (e.g., critical thinking, problem solving, decision making, communication)*
 - b. *Explain how career readiness skills contribute to success in a variety of career and life settings*
 - c. *Reflect on experiences that provide opportunities to gain and/or strengthen career readiness skills*
2. *Self-Advocacy Students will:*
- a. *Define the term “self-advocacy” as it relates to success in a variety of career and life settings*
 - b. *Identify and discuss strategies to overcome obstacles and challenges to success in a variety of career and life settings*
 - c. *Explain how self-advocacy can assist in reaching short-, mid-, and long-term goals²*

Perkins postsecondary eligible institutions are required to maintain a partnership with their local One Stop Career Center System. This, along with work-based learning opportunities are critical methods to supporting the inclusion of employability skills in CTE programs. All institutions must maintain a local advisory council to facilitate connections with local industry and stay abreast of workforce needs. This collaboration addresses alignment between workforce and special populations with emphasis on providing special populations access to in-demand and high-wage employment opportunities. Moving forward, NYSED will seek stakeholder input on how to expand and strengthen quality work-based learning in both secondary and postsecondary programs. Moreover, there will also be a focus on developing tools and resources to provide recipients to better align to labor market information and workforce development needs. This will also involve the input, collaboration, and expertise of other state agencies.

B2c. i-vii Describe how the eligible agency will—

B2c i. Make CTE pathway information available

make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;

School counselors can be an important resource of CTE information. NYSED needs to provide stronger support and guidance to assist school counselors in providing students accurate information about CTE. In September 2019, NYSED held its first workshop directed to school counselors, whose preparation programs focus primarily on academic counseling rather than on career counseling. The workshop, delivered by Advance CTE trainers, limited attendance to 50, but many more called to enroll. NYSED plans to provide more professional development so that counselors can share up-to-date information about CTE to students and parents.

Approved CTE programs for high school students have gained more visibility since a CTE graduation pathway was approved by the Board of Regents in 2015. Since then, all information targeted to students about graduation requirements includes details about [the multiple pathways to graduation](#). Students and parents can review secondary programs with current NYSED approval on [the CTE webpage for approved programs](#) to see the variety of offerings in their district. Parents can also stay informed by subscribing to updates from the Commissioner and the State Education Department listservs. For example, in February 2019, the launch of “[Paths to the Professions](#)” web site was announced via Commissioner’s update. The new web resource provides parents and students information on the licensed professions in New York.

Additionally, the CTE community, particularly the state’s professional organizations of CTE teachers and administrators, perform important outreach to students, parents, school counselors, and special populations to inform them about available programs of study. This is accomplished through various methods including professional development; visits to component districts to arrange site visits for interested students; counseling services; informational documents; career fairs; college nights; and other opportunities for students, parents, and other interested individuals.

NYSDOL continues to host [CareerZone](#) which is used by middle and high school students statewide as a tool for career exploration and up-to-date education and labor market information. Many instructors include the use of CareerZone in the delivery of the half unit study “Career and Financial Management,” which is required content for all NYSED-approved CTE programs. Resources are available for students, parents, school counselors, and teachers. Like the NYSED web pages, this site offers translation services powered by Google Translate.

NYS Commissioner’s Regulations require that districts engage with parents of ELL students in their preferred language. In 2016, new Part 154 regulations clearly defined policies about partnering with families of ELL students in the language learning and educational goal setting, including career and technical education.

NYSED’s CTE TAC maintains a statewide field presence to connect district administrators, counselors, CTE teachers with current information about CTE developments in the state. Their model program recognition initiative shares promising practices with the field.

New York’s regional technical centers, the BOCES, offer NYSED-approved programs in all regions of the state outside of the Big Five cities. Orientations to BOCES CTE programs are offered to students in their service areas each year. Peer-to-peer classroom visits are held to connect BOCES students with students considering CTE. On-site tours of the BOCES facilities are scheduled regularly. All Perkins recipients provide counseling services, informational documents, career fairs, college nights, and other opportunities for students and parents. Most BOCES and Big Five cities host Pathways to Career events where students interact with employers.

The CTE professional organizations partnered to develop an awareness campaign, [CTE Strong](#), that provides materials to the CTE community to promote CTE statewide. The CTE TAC professional leadership meetings have strengthened the working relationship of these organizations.

The postsecondary office will expand their website to include portals to target specific audiences: students/parents, educators, and institutions. These portals would include information regarding program availability, work-based learning opportunities, dual enrollment, and employment trends.

NYSED continues to gather input from the field to determine if there are additional means to raise the profile of NYSED-approved programs. Work is also underway to design a CTE-specific report that will display secondary CTE student performance in the accessible format of the NYSED public data web page.

B2c ii Collaboration among eligible recipients

facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;

Secondary-level approved CTE programs provide students a way to create an interest-driven graduation plan. During the Perkins IV years, NYSED focused efforts on creating the CTE graduation pathway that permits students to use a technical skills assessment to fulfill an assessment requirement. The Perkins V efforts will use that foundation to improve connections between learner-levels.

Perkins V brings the opportunity to revisit the practices governing articulation agreements between secondary and post-secondary entities. Approved secondary CTE programs, by definition, link secondary programs with postsecondary and occupational entry points. All approved programs offer at least one articulation agreement with postsecondary studies for certification, apprenticeship, or college degree.

These singleton agreements have limited the growth in the number and quality of career pathways available. Articulation agreements that serve an entire region instead of a single program would make program of study development accessible to more districts. Districts and BOCES seeking NYSED program approval develop their own agreements with local postsecondary training entities, colleges, or apprenticeships. These program-level agreements are not durable and can be discontinued with changes in administrators. As mentioned in B1d, regional articulations seem more likely with the implementation of standardized curricular frameworks that define core program content statewide.

Work on regional articulation agreements to strengthen secondary to postsecondary connections depends on what is first accomplished at the curriculum level. To address the identified priority of building regional collaboration among secondary, postsecondary and business and industry, NYSED will utilize the strength of their professional organizations, coupled with the assistance from the CTE TAC to develop suggested protocols, processes, and tools that could be utilized in fostering regional collaboration. These tools could be refined and piloted in targeted regions with the goals of scaling these incrementally throughout all regions in the state.

In New York, discussions have begun on how graduation requirements could be reframed to better address the future readiness of our students. The ESSA plan's College, Career, and Civic Readiness Index signals a broadening of expectations for secondary education. The next year may build on this theme and shine a brighter light on the knowledge, skills, and abilities needed for future readiness and success. The review of graduation requirements presents NYSED with the opportunity to incorporate ways high school CTE pathways connected to post-high school career learning can be built for all students. The CTE Office plans to provide exemplar pathway maps to serve as resource for school counselors as they

implement new requirements of the comprehensive developmental school counseling/guidance programs regulations¹⁷ on career planning. Similar visualizations of possible graduation and career plans will be offered to graduation requirement review committees.

Presently, there is the opportunity for dual or concurrent enrollment with the NYS P-TECH programs. NYS P-TECH is a public-private partnership that will prepare New York students for high-skills jobs of the future in technology, manufacturing, healthcare and finance. The NYS P-TECH model is designed to deliver five core benefits to students:

- A rigorous, relevant and cost-free “grades 9 to 14” education focused on the knowledge and skills students need for Science, Technology, Engineering and Math (STEM) careers;
- Workplace learning that includes ongoing mentoring by professionals in the chosen career sector, worksite visits, speakers and internships;
- Intensive, individualized academic support by K-12 and college faculty within an extended academic year or school day that enables students to progress through the program at their own pace;
- An Associate of Applied Science degree in a high-tech field; and
- The commitment to be first in line for a job with the participating business partners following completion of the program.

The program is also designed to:

- Develop programs of study in high-wage, in-demand career areas;
- Align school, college and community systems in these programs of study;
- Support strong academic performance;
- Promote informed and appropriate career choice and preparation; and
- Ensure that employers in key technical fields have access to a talented and skilled workforce.

Through these programs of study, students will be able to earn transcripted college credit toward an Associate degree. Career pathways begin in grade nine and include workplace learning and high school and college coursework. The pathway provides a seamless sequence of study extending through two years of postsecondary career and technical education which culminates in an A.A.S degree.

The NYSED will collaborate with the CTE advisory panel to identify new models to strengthen collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points.

¹⁷ See [8 CRR-NY 100.2](#) Beginning in the 2019-20 school year, districts must implement a comprehensive developmental school counseling/guidance program which includes annual individual progress review plan, reflecting “each student’s educational progress and career plans.” Required core curriculum will also be delivered to all students that will address student competencies related to career/college readiness, academic skills and social/emotional development.

B2c iii Program Alignment to Labor Market Data

use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;

The use of labor market information is built into the CTE program approval and Perkins grant review processes. Districts and BOCES with approved programs are required to meet regularly with advisory councils and all program and project development begins with advisory committee input regarding local labor market conditions. New York Education Law specifies required board composition as follows:

1. *The board of education of each school district and of each board of cooperative educational services maintaining an approved career education program shall appoint an advisory council for career education consisting of at least ten members. The membership shall include, but not be limited to, persons:*
 - a. *Familiar with the vocational needs and problems of management and labor in the region.*
 - b. *Familiar with programs of career education at the postsecondary and adult levels.*
 - c. *Familiar with the manpower needs and requirements of the region to be served.*
 - d. *Familiar with the special educational needs of the physically and mentally handicapped.*
 - e. *Representative of community interests, including persons familiar with the special needs of the population to be served.*
 - f. *A student who is participating in a career education program at the school district or board of cooperative educational services district being served by the advisory council.*
2. *It shall be the duty of such advisory council for career education to advise the board of education or board of cooperative education on the development of and policy matters arising in the administration of career education, including the preparation of long-range and annual program plans submitted to the commissioner of education, and assist with an annual evaluation of career education programs, services and activities provided by the school district or board of cooperative education.*
3. *Advisory councils may appoint consultant committees representative of specific occupational fields to assist in the work of the council and the board of education or board of cooperative education with respect to the planning, development and requirements for establishment of in or evaluation and revision of existing programs.*
4. *The board of education of any school district or the board of cooperative educational services may employ such professional, technical and clerical personnel as may be necessary to enable the advisory council to carry out its functions specified in this section.¹⁸*

Local data on high growth, emerging, and/ or significant industries and occupations is produced by the NYSDOL. The NYSDOL 's regional workforce research and national BLS data is integrated

¹⁸ New York State Consolidated Laws, EDN Art. 93 Sec. 4601, "Advisory Councils," <https://www.nysenate.gov/legislation/laws/EDN/4601>, accessed 9/18/19

into two on-line resources that provide current state and regional labor market data for program developers and grant reviewers to evaluate how program content aligns with current conditions. These tools, “[CareerZone](#),” (used by school counselors and students), and [the Job Zone](#), (targeted to adult job seekers) provide data and outlooks at the career cluster and occupational specific levels. CTE learners of all ages can use this accessible career development information to chart their course forward in rapidly changing occupational categories and employment patterns.

Short-and long-term trend data for agencies participating in workforce development activities is provided by the NYSDOL ’s [Research and Statistics Office](#) and is another resource for advisory boards and CTE program developers. These projections include occupations with the most openings and the fastest growing occupations on a state and regional level.

The extent to which CTE programs relate to existing regional industries and occupations creates useful, but temporary benchmarks for program developers. The best CTE programs in the state fulfill the dual role of giving students skills needed in current entry-level positions and those needed throughout their careers regardless of occupation. According to a recent study by the McKinsey Global Institute, “major transitions lie ahead that could match or even exceed the scale of historical shifts out of agriculture and manufacturing.” The study’s models suggest that by 2030,

- “75 million to 375 million workers (3 to 14 percent of the global workforce) will need to switch occupational categories...
- all workers will need to adapt, as their occupations evolve alongside increasingly capable machines.”
- adaptation may take the form of “additional educational attainment or spending more time on activities that require social and emotional skills, creativity, high-level cognitive capabilities and other skills relatively hard to automate.”¹⁹

B2c iv CTE Access

ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;

New York employs a number of strategies to ensure equal access to approved CTE programs assisted under Perkins.

New York funds the center for non-traditional employment and training through the use of the nontraditional set-aside funds described in 112(a)(2)(B). The Non-traditional Employment and Training Project (NET) is housed in the Center for Women in Government and Civil Society at SUNY Albany’s

¹⁹ JOBS LOST, JOBS GAINED: WORKFORCE TRANSITIONS IN A TIME OF AUTOMATION. McKinsey Global Institute, accessed at <https://www.mckinsey.com/global-themes/future-of-organizations-and-work/what-the-future-of-work-will-mean-for-jobs-skills-and-wages> 3/6/18

Rockefeller College. The NET Project provides statewide technical assistance to eligible recipients on nontraditional career options. Assistance to the field includes

- website provides resources to support the mission of building a nontraditional workforce through expanded educational and career opportunities for students.
- a monthly newsletter distributed electronically to a state and national audience.
- Sponsorship of the Vanguard Award, which recognizes outstanding secondary and postsecondary level students throughout New York State who are enrolled in Career & Technical Education programs that are not traditional for their gender.
- programs to encourage middle and high school girls in Science, Technology, Engineering and Math (STEM) career pathways.
- strategies for CTE providers for student recruitment and retention

Section 112 (a)(2)(C) funds set-aside for the recruitment of special populations will be used to assist the Office of Bilingual Education and World Languages in addressing barriers to participation for ELLs. Components of a shared service model for ELLs in use at one BOCES may be deployed at the secondary and postsecondary levels to bolster recruitment.

Ensuring special populations equal access and opportunity for success in all educational opportunities is built into all program areas at the NYSED. ESSA, Perkins, and IDEA activities are centered on the success of all students. New York's ESSA mission statement illustrates the degree to which advancing equity informs our work: "New York State is committed to ensuring that all students succeed and thrive in school no matter who they are, where they live, where they go to school, or where they come from."

Access to programs involves more than the ability to enroll and attend. The New York State Education Department released guidance on equitable course access guidance in November 2019 to assist school districts in their efforts to provide course access equity. The guidance focused on advanced courses, but the guiding principles put forth apply to all subject areas, including CTE. Five district- and school-level guiding principles are offered:

Access to programs involves more than the ability to enroll and attend. The New York State Education Department released guidance on equitable course access guidance in November 2019 to assist school districts in their efforts to provide course access equity. The guidance focused on advanced courses, but the guiding principles put forth apply to all subject areas, including CTE. Five district- and school-level guiding principles are offered:

1. Providing a course sequence and foundation-building in earlier grades
2. Creating multiple access points to programs
3. Using only enrollment access criteria that are educationally necessary;
4. Offering a robust set of student supports that help all students succeed
5. Publishing materials that encourage all students to participate (e.g., materials available in multiple languages.).²⁰

²⁰ See [Equitable Course Access Guidance](#) a field memo from Dr. Kimberly Young Wilkins, NYSED Deputy Commissioner of Instructional Support accessed January 10,2020.

Another strategy supporting equity and access is the Regents initiative on Social and Emotional Learning (SEL). Launched in 2018 to guide schoolwide goals for SEL, this school improvement approach creates a framework for students to take full advantage of educational opportunities and to prepare them for college and/or career through practice in

- Developing self-awareness and self-management skills essential to success in school and in life;
- Using social awareness and interpersonal skills to establish and maintain positive relationships; and
- Demonstrating ethical decision-making skills and responsible behaviors in personal, school, and community contexts.

These three process skills are introduced to all students in the required middle-level CTE course that is structured around the [middle-level theme framework](#).

The CTE TAC contributes to equity and access efforts through the professional development workshops focused on instructional strategies to meet the needs of a range of learning needs.

Improved data reporting and visibility in published CTE outcome data will give us greater clarity on where improvement is needed. Program-level data may yield new insights about the specific programs where equity and access issues may exist. The secondary local application is a direct extension of the CLNA findings. Projects must clearly define how the use of funds address equity and access issues. Recipients with persistent shortfalls in this area will be required to set aside a certain percentage of funds to make improvements.

At the postsecondary level, Perkins administration is within the purview of the Office of Postsecondary Access, Support, and Success. This office administers a number of opportunity programs that target access and equity issues and Perkins V implementation is shaped by the office's overall mission.

New York fulfills federal requirements pursuant to 1979 "Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Career and Technical Education Programs." NYSED secondary and postsecondary staff provide technical assistance to agencies receiving federal financial assistance, (i.e., local school districts, BOCES, and public two-year colleges). These reviews and the technical assistance provided are geared toward the prevention, identification, and remediation of discrimination on the basis of race, color, national origin, sex, disability and age in career and technical education programs that receive federal assistance. These reviews monitor access of special populations to career and technical education programs and services. NYSED performs annual risk assessment using available enrollment data and other information to identify to the possible non-compliance of secondary or postsecondary programs, develops targeting plans and process that are approved of USDE Office of Civil Rights.

B2c v. Coordination to develop career pathways

coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;

The development of career pathways occurs under the purview of the New York State Board of Regents. District level or college-level program developers, in consultation with state-mandated advisory committees, secure program approval from the NYSED. Employer and industry partners are always a part of any program development process as this is required by New York State education law. Local

industry representation on secondary and post-secondary advisory committees and workforce development initiatives provide on-going sector information to guide program content. The NYSED participates in the WIOA interagency workgroup with other One-Stop partners to provide insights about the high school and postsecondary approved programs in the CTE continuum. All partners assess the ways in which CTE programs contribute to the overall system of CTE delivery

B2c vi. Experiences in all aspects of an industry

support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities;

In New York, students begin exploring all aspects of an industry in middle school. The required middle-level CTE instruction is in place to help prepare students to make informed decisions about high school programs of study. In September 2017, the Board of Regents revised the CTE portion of [Commissioner's Regulations 100.4\(c\)](#) to expand flexibility of the middle-level requirement. The main provisions are that

- all middle-level students are entitled to 1 ¼ unit career and technical education;
- instruction can begin as early as grade 5; and
- instruction can be delivered by teachers certified in any title in any CTE content area.

A curricular guidance framework was developed in collaboration with CTE teachers statewide to assist schools in the implementation of the changed middle-level CTE regulation. The curricular guidance is comprised of Theme Modules and Content Modules. (For more information regarding how the modules are designed to work together, please see [About the Modules](#) . NYSED will support collaboration between middle and high schools through the development of additional guidance and strategies for WBL to connect middle level CTE initiatives to high school programs of study.

Local service delivery focuses on meeting the needs of businesses and jobseekers through public-private sector partnerships with priority given to removing barriers to employment for individuals in special populations. In accordance with WIOA, New York created eligibility criteria for local board membership that promotes responsiveness to local conditions.

All NYSED-approved secondary CTE programs are required to offer work -based learning through placements in local businesses or nonprofit agencies and through simulated work environments. Student run enterprises in particular expose students to a number of occupational categories inherent in the student enterprise (e.g., product development, construction, marketing, accounting, etc. in a student tee-shirt business). New York will issue more detailed guidance about the provision of quality work -based learning and will convene a state-wide advisory group for this purpose. For the 2019-20 transition year New York defined participation in work-based learning as any of the four New York State registered work-based learning programs (WECEP, CEIP, GEWEP, and Co-op) as well as the following non-registered experiences: school-based enterprise; supervised clinical experience (health sciences and appearance enhancement programs only); community service; school-based projects; and job shadowing. Field trips, guest speakers, routine classwork, college visits, and non-school affiliated employment will not count as work-based learning. The WBL quality indicator will be based on the percentage of CTE concentrators who have completed 54 hours or more of work-based learning

experiences. These experiences can be of any combination of registered or non-registered experiences listed above.

State standards for implementation would improve uneven quality of experiences offered to students in different regions of the state. Advisory panel members identified several themes that frame out what all work-based learning experiences should offer. The initial suggestions for standardization relate to establishing common

- content of college course work required to receive the WBL extension;
- training of work-place supervisors;
- measures of student learning;
- data elements needed to assess program quality;
- labor market data to provide current picture of occupational categories within regional industries; and
- advisory and work-based learning site resources.

WBL coordinators usually manage numerous responsibilities—often in addition to regular teaching duties. Providing standardized definitions and expectations for work-based learning experiences can provide a common structure to WBL programs in all regions of the state. WBL coordinators can build upon a common state-determined framework to incorporate all aspects of regional industries. The current state WBL manual provides useful descriptions and related regulations but does not provide guidance about how and what should be measured when evaluating what learning outcomes have been achieved through WBL. The NYSED intends to make use of existing models and technical support that can be provided by the CTE TAC or other entities specializing in work-based learning implementation to provide more specific guidance and tools. The aim is to provide better clarity on what constitutes impactful WBL experiences. To do this, NYSED will form a WBL advisory committee to develop common measures to define quality.

As mentioned above, coordination between secondary and post-secondary CTE providers does not occur on a regional basis. Individual programs develop their own work-based learning resources, internships, mentorships, simulated work environments, and other project-based learning. This approach guarantees duplication of efforts. The selection of work-based learning as New York’s program quality indicator provides the opportunity to develop state- or region-wide resources.

B2c vii. Improving outcomes and reducing performance gaps

improve outcomes and reduce performance gaps for CTE concentrators²¹, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V)

Reducing performance gaps can begin with the identification of the gaps in the CTE delivery system. The first gap is the above-mentioned structural impediment to CTE access caused by the crowded 9th and

²¹ In New York, a concentrator at the secondary level is a student who has completed at least two sequenced CTE courses (equivalent to two full school-year courses) in an LEA approved program, or BOCES CTE course work in a state-approved program equivalent to two full-year high school courses.

10th grade schedules to fulfill current graduation requirements. Ideally, 9th and 10th grade CTE options would further focus student graduation plans through more exposure to career content and introduction of technical skills. In 2001, the Board of Regents instituted a CTE policy that solved the problem of time in student schedules that prevented many from accessing two-year BOCES programs of study in 11th and 12th grades. To solve the problem of time, BOCES and districts having programs approved by the NYSED could offer integrated academic credit that would count toward graduation requirements. The 9th and 10th year CTE gap presents us with the same problem of time in student schedules. These are critical years for academic credit accumulation. Even in the most robust CTE programs, a gap exists in academic credit availability via CTE at these grade levels. Increasing the opportunities for earning graduation credits through CTE courses in grades 9 and 10 encourages student engagement and persistence to graduation. Approved CTE programs offer integrated academic credits for graduation but these programs are mostly offered in grades 11 and 12 and most frequently in CTE themed high schools or BOCES.

The gap in CTE access in the 9th and 10th grades could be addressed with changes to the graduation requirements. Challenges to be resolved include:

- The current CTE policy design has proved most favorable to the BOCES extended time model for integrated credit by allowing students to receive integrated instruction at the BOCES. School district CTE programs have not been able to fully take advantage of integrated instruction benefits and program approval due to limited resources and facilities.
- There are few examples of integrated courses that could serve as models.
- There are few incentives for school districts to change to an integrated approach (most take a course by course (“specialty course”) approach).

Other options could include specialized and project-based instruction that use core academic courses to continue development of the middle level [process skills](#) (e.g., problem definition and problem solving, self-management, communication skills, etc.). Continuing the continuum of CTE learning experiences in the 9th and 10th grades can improve student engagement and persistence for all students, not just those at risk of becoming disconnected from school.

New York Perkins planning to improve outcomes for CTE concentrators will include services that work in concert with New York’s ESSA strategy of supporting culturally responsive and sustaining education by focusing on educator preparation, social and emotional learning, and equity in resources. Perkins V planning has highlighted the need for better measures to determine which schools need support to improve student success. Using the ESSA framework as a guide, technical assistance during Perkins V will be provided in a differentiated manner in order to support schools that need it the most. The publication of CTE student outcomes in relation to other students will point to any differences in subgroup performance that should be addressed with Perkins-funded projects.

All offices at NYSED promote initiatives to foster student engagement and achievement. Program improvement through the use of evidence-based practices is the department-wide goal. Strengthening the use student progress data to make deliberate instructional decisions creates a learning environment centered on the individual needs of students.

To support eligible recipients, the NYSED offices administering Perkins V must address data quality. Reliable data is the foundation for all other planning. We plan to make use of the expertise offered through Advance CTE, department, district and regional data managers, and other sources of expertise to build performance reports to give a bigger picture than the Perkins indicators. Program level evidence

like completion rates by location, attrition rates by year of enrollment, technical endorsement attainment, CTSO membership levels etc. give a fuller understanding program quality and areas in need of improvement.

B2 d Dual or Concurrent Enrollment

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. (Section 122(d)(4)(D) of Perkins V)

Approved secondary CTE programs, by definition, link secondary programs with postsecondary and occupational entry points. All approved programs offer at least one articulation agreement with postsecondary studies for certification, apprenticeship, or college degree programs. There is also the opportunity for dual or concurrent enrollment with the NYS P-TECH programs.

Reporting student participation in dual or concurrent enrollment programs is an ESSA school quality indicator. Most districts in the state (658 of 732 districts) report enrollments in classes offering college credit in CTE. Of the 246,169 enrollments in dual credit high school classes, just over 16% were in CTE content areas. The secondary CTE Office is exploring ways of including this data element on CTE performance reports so that programs can monitor gains in availability.²²

B2 e Involving Stakeholder Groups

e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs. (Section 122(d)(12) of Perkins V)

NYSED plans to continue to rely on the existing communication channels within regional service areas of the BOCES and community colleges. The advisory councils mandated by New York State education law includes broad representation that includes of CTE and special education teachers/administrators, school counselors, and representatives of business and industry, unions, Indian Tribes, and students/parents.

The New York State Education Department is developing a Parent [Dashboard](#) to increase transparency and make information about school performance and other school-level data easier for parents and the public to access. The CTE Office will coordinate publication of CTE program reports with the dashboard development, which was begun as a part of [New York's ESSA plan](#) to provide public data to inform decisions about plan revisions.

²² Source, NYSED's Information Reporting Services enrollment by course code data, accessed 9/26/19

B2 f Local applications

Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V. See Text Box 4 for the statutory requirements for local applications under section 134(b) of Perkins V.

See Attachment 2

B2 g Comprehensive local needs assessment templates

Include a copy of the comprehensive local needs assessment template and/or guidelines that the eligible agency will require of eligible recipients to meet the requirements of section 134(c) of Perkins V. See Text Box 5 for the requirements for the comprehensive local needs assessment under section 134(c) of Perkins V.

See Attachment 3

B2 h Size, scope and quality definitions

Provide the eligible agency's definition for "size, scope, and quality" that will be used to make funds available to eligible recipients pursuant to section 135(b) of Perkins V.

For secondary programs, the following definition will be used:

Programs of sufficient size

- BOCES or school districts must provide a minimum of 3 NYSED-approved CTE programs of study in 3 of the 16 national career clusters (see <https://careertech.org/career-clusters>)
- Each program of study must be serving a minimum of 8 CTE concentrators (this includes concentrators in grades 9-12 with active program service records reported to the SIRS)
- Enrollment must be open to all students with adequate supports provided for student success

Programs of sufficient scope

- Progress in specificity, beginning with exploration of multiple aspects of an industry or career cluster and leads to more occupation-specific instruction
- Are a nonduplicative sequence of courses offering academic, technical, and employability skills to expose students to multiple aspects of an occupational area
- Align with the needs of industry in the economy of the state, region, or local area
- Offer multiple entry and exit points
- Culminate in the ability for students to attain a recognized postsecondary credential

Programs of sufficient quality

- Achieve or make progress toward achieving performance targets established for Perkins core indicators
- Are aligned to state academic learning standards and industry standards and are delivered by appropriately certified teachers who have on-going professional development in instructional strategies to meet the needs of all learners
- Include articulation agreements including dual credit with postsecondary institutions and apprenticeship programs.
- Result in student attainment of a credential that confers added value to the high school diploma. The CDOS Credential, an industry recognized certification (e.g., Microsoft Office Specialist) or the CTE technical endorsement, or a combination of these.

For postsecondary programs, the following definitions will be used:

- Size—eligible institutions must have a minimum of five approved CTE programs and the ability to generate a minimum of \$50,000 in formula funding on their own or by partnering with another institution in the form of a consortium.
- Scope—programs must prepare concentrators for employment in high-skill, high-wage, or in-demand careers. Programs must lead to technical skill proficiency or a recognized postsecondary credential. Scope must ensure all students are provided with equitable access to CTE programs of study.
- Quality—is measured by evaluation of the program’s progress on the Core Indicators of Performance as compared to federal and state targets.

B3. Meeting the Needs of Special Populations

B3a Describe the eligible agency’s program strategies for special populations, including a description of how individuals who are members of special populations—

B3a i. will be provided with equal access to activities assisted under this Act;

NYSED’s CTE Office (and other offices) review grant activities for compliance with the least restrictive provisions IDEA. Yearly grant applications require a summary of efforts to ensure equal access. The CTE TAC provides instructional support and teacher training focused on differentiated instruction to meet the needs of all learners.

The CTE Office requires that programs submit data on the number of students with Individual Education Plans (IEPs) and 504 plans in applications for program approval or reapproval.

NYSED will identify other sources of data that will provide a broader scope of information about disparities in program enrollment and completion rates for special populations. Currently, a report of

students earning the CDOS credential or CTE technical endorsement is not available at the CTE program level. Provision of these data elements will give programs yearly feedback on special population attainment of these milestones. Tracking these markers of success needs to be easier and readily available to students and parents.

A more standardized process for Perkins project review and approval will be based on goals beyond the Perkins indicators. A new framework to be developed for review will be rubric based and give clearer definitions of the evidence needed to show that action steps and funded activities relate to priorities identified in the needs assessment. This will include a focus on any student group where enrollment rates and levels of achievement lag behind others.

Performance data at the program level will allow grantees to better evaluate which programs require support to improve student outcomes. In addition to student performance and achievement data, other data elements may be considered including:

- Program attendance and completion;
- Enrollment patterns of special populations (e.g., program departures during the first few weeks);
- Demographics of CTE program vs region;
- Rates of de-classification of students with disabilities prior to enrollment in BOCES; and
- Involvement of CTE educators in IEP review

The postsecondary program office will promote equal access to activities for special populations through the website and presentations/workshops. The postsecondary comprehensive local needs assessment template will require examination of data to assess gaps in access and equity and to develop a plan to address these. The local application will require all projects to describe a plan to recruit, educate, and support special populations in CTE and nontraditional fields. Institutions must provide in their local applications a description of how members of special populations will not be discriminated against. Institutions are required to describe approaches they will utilize in order to prevent such discrimination.

During a stakeholder consultation session, CTE program administrators proposed developing specific measures to assist homeless CTE students. The NYSED agrees that addressing the needs of this special population could improve CTE participation rates and school persistence. Districts and post-secondary service areas with significant enrollments of homeless students will be consulted to explore how Perkins funds may be applied to connect or sustain homeless students in a CTE program of study.

B3a ii. will not be discriminated against on the basis of status as a member of a special population;

There are a number of state and federal mechanisms in place to protect members of special populations from discriminatory acts.

In New York, the Dignity for All Students Act added instruction in civility, citizenship, and character education by expanding the concepts of tolerance, respect for others, and dignity to include: an awareness and sensitivity in the relations of people, including but not limited to, different races; weights; national origins; ethnic groups; religions; religious practices; mental or physical abilities; sexual orientations; gender identity; and sexes. The Dignity Act also requires Boards of Education to include language addressing The Dignity Act in their codes of conduct. Additionally, under the Dignity Act,

schools will be responsible for collecting and reporting data regarding material incidents of discrimination, harassment, and bullying. A state-funded technical assistance center New York State [Center for School Safety](#) provides information on DASA provisions and implementation.

New York State Human Rights Law was amended in July 2019 to cover public schools. The new law gives the NYS Division of Human Rights the ability to investigate reports of bullying, harassment, or other forms of discrimination at public schools.

The NYSED Office of Special Education works to promote educational equity and excellence for students with disabilities through its roles and responsibilities to:

- oversee the implementation of federal and State laws and policy for students with disabilities;
- provide general supervision and monitoring of all public and private schools serving New York State preschool and school-age students with disabilities; and
- ensure a system of due process, including special education mediation and impartial hearings.

NYSED's secondary and postsecondary offices administering the Perkins grant carry out civil rights reviews as required by the Methods of Administration outlined in the Vocational Education Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Disability.

B3a iii-iv Special population programming

iii. will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations; and

iv. will be provided with appropriate accommodations;

New York State provides a comprehensive set of accommodations to ensure that Students with Disabilities and/or English Language Learners/Multilingual Learners (ELLs/MLLs) will have an equitable opportunity to participate in CTE. New York State's testing accommodations for students with disabilities are provided in six major categories: Flexibility in Scheduling/Timing; Flexibility in Setting; Method of Presentation; Method of Response; Other Accommodations; and Accommodations for Physical Education Assessments. Individualized Educational Program (IEP) team members and school administrators are provided extensive guidance on the proper selection of specific accommodations within these categories and the application of accommodations in test administration. Specific testing accommodations are made available for all ELLs/MLLs and applied as determined by school administrators, in accordance with guidance provided by the NYSED.

As mentioned above, homeless students confront barriers to accessing CTE programs. Identifying possible accommodations to mitigate these barriers would target funds to this underserved population. State education laws include provisions that homeless students

be provided services comparable to services offered to other students in the school...including the following: transportation services; educational services for which the child or youth meets the eligibility criteria, such as services provided under Title I of the Elementary and Secondary Education

*Act of 1965 or similar state or local programs; educational programs for children with disabilities; educational programs for English learners; programs in career and technical education; programs for gifted and talented students; and school nutrition programs.*²³

Accessing timely support through this law would not be certain (i.e., districts are not required to offer NYSED-approved CTE programs) and, therefore, not responsive to needs arising during CTE program enrollment/participation.

The NYSED will work with advisory committees to define the ways Perkins may be deployed in ways that are responsive to the needs of homeless students.

B3a v. will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)

In accordance to state and federal law, instruction and other activities, such as work-based learning, are provided in the least restrictive environment appropriate for individual students. This requires schools to provide supplementary services to enable students with disabilities to attend regular education classes. New York has authorized the use of consultant teachers to provide “direct and/or indirect services to students with disabilities who attend regular education classes, **including career and technical education classes**, and/or to such students’ regular education teachers.”²⁴

In New York, transition services are provided to students with IEPs at age 15. These services include planning post-high school learning or employment in competitive settings as appropriate. CTE programs provided by New York’s BOCES are a major source of programming leading to positive outcomes for special populations. The half-day, two-year delivery model results in higher graduation rates for students with disabilities than their counterparts taking CTE at the component high school. Two-year programs at the BOCES provide the in-depth study and real-world application of knowledge that prepares students for further study or competitive employment.

B4. Preparing Teachers and Faculty

Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including PD that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)

Many CTE providers face challenges in securing appropriately certified CTE teachers. Recruitment of CTE instructors is complicated by the need for candidates to have industry knowledge and experience and the ability to acquire pedagogical skills to deliver content to secondary and postsecondary settings. Approved secondary CTE programs frequently integrate academic instruction. CTE teachers are often

²³ Section 3209, NYS Consolidated Laws, <https://www.nysenate.gov/legislation/laws/EDN/3209> accessed 9/25/19.

²⁴ 8 CRR-NY 200.6, emphasis added

supported by core academic area teachers, but they are expected to contribute to school-wide efforts to improve student literacy and numeracy levels.

New York has made several modifications to Transitional A certification²⁵ requirements for secondary teachers that allow a broader range of industry professionals with technical knowledge and skills to begin teaching while they acquire pedagogical skills to meet the needs of different types of learners. More specific guidance has been posted to the Office of Teaching Initiatives [certification page](#).

Requirements for postsecondary instruction are set by locally by the CTE provider. Most community college CTE instructors possess a combination of degrees and industry experience.

Schools are making use of new teacher induction trainings offered in the summer. The Teaching to Lead program has been embraced by numerous locations to enhance skills new teachers need immediately (e.g., lesson planning, differentiated instruction, basic classroom management). The program improves new teacher retention. The CTE TAC is involved in train the trainer sessions to increase the use of the Teach to Lead strategies and approach.

NYSED is considering ways to make broader use of teacher externships and may integrate this as a state priority for fund use in future Perkins applications. First, recipients must use the CLNA to evaluate how well program content aligns with current industry standards.

²⁵ For a description of the 10 Transitional A options see <http://www.highered.nysed.gov/tcert/certificate/cte/certificate-types.html>

C. FISCAL RESPONSIBILITY

1. Program Approval

Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—

C1a academic achievement

each eligible recipient will promote academic achievement;

For the 2019-20 program year, NYSED designated several priority areas to focus local applications. Applicants developed at least two projects: One required project regarding program evaluation to begin work that would be the foundation for the CLNA and at least one other project to address one of three state priorities: 1. Developing and sustaining work-based learning programs and activities; 2. Supporting students with disabilities (SWD) and English Language Learners (ELLs); or 3. Building program connections to business and industry. New York will determine other state-wide priorities for local recipients in future program years that consider common gap areas uncovered by the comprehensive local needs assessments.

C1b skill attainment

each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and

For Perkins V, NYSED has elected to focus Perkins funding on approved programs. Programs without NYSED approval cannot be funded as in past years.

NYSED will promote skill attainment by phasing in higher standards for continued Perkins funding. To be considered for Perkins funding for Program Year 4 (2022-23), approved programs must show that all students

- exit with a credential that supplements their high school diplomas such as the CDOS Credential, an industry recognized certification (e.g., Microsoft Office Specialist) or the CTE technical endorsement, or a combination of these.
- take part in quality work-based learning experiences
- are provided with a continuum of supports necessary for successful program completion

These Year 2-4 state priorities will be carried out in projects that align with the six Perkins V requirements for uses of funds established in Section 135(b)

All approved programs culminate in a three-part technical skills assessment. New York regulations do not require students to take the exam so there is great variation statewide in the numbers of students taking the technical skills assessment. During Perkins V, NYSED will be placing greater emphasis on

increasing the numbers of students who attempt these assessments as a way to build in rigorous content and effective instruction.

NYSED selected the Perkins program quality indicator that tracks student participation in work-based learning after obtaining input from stakeholders. This is the option that offers students the chance to learn technical and employability skills as they explore in greater detail occupational fields. Stakeholders expressed concern that technical skills assessment was not selected as New York’s quality indicator. While NYSED remains committed to maintaining technical skills assessments as a required component of approved programs, most of them do not meet the definition in Section 113. The majority of approved programs use an end of program assessment such as the NOCTI or Precision, but neither confer a post-secondary or industry credential as defined in Perkins V.²⁶ The NYSED will explore other options for highlighting student achievement in challenging the technical skills assessments of their approved programs.

The postsecondary program office continues to require institutions to provide in their local applications specific criteria and processes explaining how they will promote and evaluate student academic achievement. They are required to analyze data such as enrollment, retention, completion, placement data, and any other measures that reveal performance gaps. New with Perkins V is the requirement for applicants to complete a CLNA using a state-developed template. Once areas for improvement are identified, Perkins funds must be directed to the CTE programs with performance issues.

Each project proposed must include a plan detailing what specific skills students need to attain in their five or more program majors. In the local application, institutions must list all of their CTE programs to demonstrate eligibility.

C1c local needs assessment:

each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations. (Section 122(d)(5) of Perkins V)

Secondary and postsecondary eligible recipients will be required to use a common template provided by NYSED. Additionally, common data sources are identified and must be used to complete the CLNA. These data sources are:

- Secondary Program-level performance by location and program code (provided by NYSED)
- Data submitted by postsecondary institutions to NYSED via the HEDSLive system.
- [Most recent secondary report cards](#) showing outcomes on the Perkins indicators to be compare to [prior year report cards](#)
- [New York State Department of Labor Industry and Occupation Projections by NYS Region](#)
- NYS Department of Labor Regional [Long-term Projections by Industry: 2016-26](#)
- NYS Department of Labor Long-Term [Occupational Employment Projections: 2016-26](#)

²⁶ Perkins uses the definition in the Workforce Innovation and Opportunity Act (29 U.S.C. 3102): “The term ‘recognized postsecondary credential’ means a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.”

C2 Fund distribution

Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed:

C2a.Secondary: among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace;

Funds received through the allotment made under Perkins are allocated among secondary level and postsecondary level CTE providers based on the last 10 years of enrollment reports. Enrollment trends remain fairly consistent. Secondary students made up 52.08 percent of the CTE enrollments and 47.93 percent were served in postsecondary/adult CTE programs. The split of funds will remain 52 percent for secondary providers and 48 percent for postsecondary providers. A portion of the funds allocated to postsecondary are distributed to Education Opportunity Centers, BOCES, and school districts for adult CTE programs.

C2b and among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace. (Section 122(d)(8) of Perkins V)

The minimum award for secondary grants is \$15,000. Secondary agencies with an allocation of less than \$15,000 or agencies not wishing to apply directly may partner with BOCES and/or school district(s). One of the partners must serve as the lead agency/applicant for the consortium and be responsible for the legal requirements, program evaluations, local advisory council, and fiscal duties and requirements of the entire consortium.

Members of the consortium sign this agreement with the understanding that the fiscal agent and agencies that enter into the consortium will conduct programming in accordance with the provisions of Perkins Section 131(f)(2) which states: *FUNDS TO CONSORTIUM. —Funds allocated to a consortium formed to meet the requirements of this subsection shall be used only for purposes and programs that are mutually beneficial to all members of the consortium and can be used only for programs authorized under this title. Such funds may not be reallocated to individual members of the consortium for purposes or programs benefitting only 1 member of the consortium.*

School districts in rural and sparsely populated areas may qualify for a waiver to the \$15,000 threshold if they are located in a rural, sparsely populated area, or is a public charter school operating secondary CTE programs; and can demonstrate its inability to enter into a consortium.

Postsecondary eligible institutions with an allocation of less than \$50,000 may partner with another institution to form a consortium. Each consortium must identify a lead fiscal institution and must provide evidence of a signed agreement. The consortium must also demonstrate how the programs offered through the partnership are mutually beneficial to all members within the partnership and agree that funds are used only for programs authorized under Perkins V. Perkins funds may not be reallocated to individual consortium members for the purposes of benefitting only one of its members.

C3 Secondary allocations

For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 131(a)-(e) of the Act and describe how these allocations are distributed to local educational agencies, areas career and technical education schools and educational service agencies within the State. (Section 131(g) of Perkins V)

For the transition year, the allocation for secondary eligible institutions was \$ 24,719,368

New York's use of funds will mostly continue the patterns established in Perkins IV with two exceptions. The state will make use of the reserve funding option and will make available the amount of leadership funds required by Section 112(a)(2)(C) for the recruitment of special populations to enroll in CTE.

New York secondary formula funds 2019-20 program year will be calculated with the same method used for the 2018-19 program year. The secondary allocations are posted on the [NYSED Perkins webpage](#), once available.

The Big 5 cities (New York City, Yonkers, Syracuse, Rochester, and Buffalo) and twelve small city school districts apply for their funds directly. All other districts join consortia led by their BOCES, who develop the local application and serve as fiscal agent.

C4 Postsecondary allocations

For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.

For the transition year, the allocation for postsecondary eligible institutions was \$22,817,878

These funds will be distributed using the previously approved NYS Career and Technical Education formula that includes additional programs that target economically disadvantaged students in addition to the Pell Grant factors set forth in the Act. The use of this formula has been "conditionally approved" by the Office of Career and Adult Education on May 6, 2019 pending submission of the New York transition plan. This formula serves more economically disadvantaged students as outlined in section 7(a) and (b) in this plan.

The funds are distributed by this formula by taking the number of disadvantaged students participating in Perkins funded programs at each institution and dividing that number by the total number of economically disadvantaged students in the Perkins program statewide; the percentage of Perkins students at each school is multiplied times the total Perkins allocation providing a projected allocation amount for each institution. This formula is based upon the number of enrolled economically disadvantaged CTE students reported by each institution. [Allocations are found in Attachment 4.](#)

C5 Use of data

Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education. (Section 131(a)(3) of Perkins V)

NYSED's Office of Information Reporting Services maintains district and enrollment data that reflects changes in school district boundaries. The [SAIP district boundary data](#) is also referenced to confirm changes.

C6 Secondary waiver

If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—

- a. include a proposal for such an alternative formula; and*
- b. describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V)*

New York will not be submitting a waiver for the secondary allocation distribution at this time. We may consider proposing an alternative formula in the future.

C7 Postsecondary waiver

If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—

- a. include a proposal for such an alternative formula; and*
- b. describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the State that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution. (Section 132(b) of Perkins V)*

Since the implementation of the previous legislation, the postsecondary program office has applied for and received approval for a waiver, contingent upon acceptance of the statewide transition plan, in order to distribute funds in a way that is more equitable within New York State.

This request is the exact waiver that was approved under Perkins IV and better targets postsecondary funds to serve economically disadvantaged students who are enrolled in credit-bearing and noncredit career and technical programs operated by both postsecondary and secondary education agencies. In addition to Pell Grants and Bureau of Indian Affairs Grants, the requested formula includes a broad range

of eligibility criteria. These eligibility criteria expand the scope of economically disadvantaged individuals to include postsecondary students in noncredit career programs who are not eligible for Pell Grants.

The proposed alternative formula defines Economically Disadvantaged to mean individuals who participate in any of the following economic assistance programs:

1. Pell Grant
2. Tuition Assistance Program (TAP)
3. Aid for Part-Time Study (APTS)
4. Educational Opportunity Program (EOP); Higher Education Opportunity Program (HEOP); Search for Education, Elevation and Knowledge (SEEK); and College Discovery (CD).
5. Bureau of Indian Affairs Higher Education Grant Program (BIA)
6. TANF Funded Services and Assistance
7. Workforce Investment Act
8. Supplemental Security Income
9. Women, Infants, and Children
10. Other public assistance programs serving economically disadvantaged, such as: Supplemental Nutrition Assistance Program, Home Energy Assistance Payments, Supplemental Security Income, Trade Readjustment Act, and Refugee and Immigration Affairs Assistance.

Or who may be documented as low income:

11. New York State's Low-Income Guidelines define an economically disadvantaged student as one who is a member of a household that meets the following income eligibility standards: The total annual income of such household is equal to or less than 185 percent of the amount under the annual United States Department of Health and Human Services poverty guidelines for the applicant's family size for the applicable year. For 2019, the Low-Income Guidelines are as follows: a total family income below \$22,459 for single persons, \$30,451 per couple, or \$38,443 for a family of three, with an additional \$7,992 per dependent child.

It is the Department's belief that the addition of these other program factors results in a more effective distribution of funds to serve economically disadvantaged students. The [attached chart](#) provides the basis for this assertion. The first column of the chart lists those agencies which qualified for a postsecondary career and technical education allocation based on the number of economically disadvantaged students enrolled in their postsecondary career education program in the period July 1, 2016 to June 30, 2017.

Economically disadvantaged was defined as those in receipt of Pell Grants as well as those students who met eligibility requirements for the economic assistance programs mentioned above. The number of such economically disadvantaged students for each agency is given in the second column. These numbers are unduplicated unit counts of enrollees in workforce, public assistance, and other programs of economically disadvantaged status.

The third column shows the number of career education students who would be served if only Pell Grants were used as a distribution factor. The fourth column gives the numbers of economically disadvantaged career students who would not be served if Pell Grants were the only factors used for the Postsecondary formula. The fifth column gives the Postsecondary allocations calculated for each of the agencies based on their economically disadvantaged student enrollment. The minimum award is

\$50,000. The sixth column shows the allocations that would result for these agencies if Pell Grants were the only factors used for the distribution of formula funds.

Several results become immediately clear from the allocations which would result from the use of Pell Grants as the sole formula factors:

1. If exclusively Pell Grant recipients were considered, at least 30,094 unduplicated economically disadvantaged students would receive no support through Perkins V Postsecondary formula funds.
2. None of New York's Educational Opportunity Centers (EOC) would receive Perkins V funding. These EOC, located in urban settings, are the branch of New York's postsecondary education system which reaches out to economically disadvantaged populations and offers remedial and noncredit career instruction. These EOC together serve approximately 4,000 students annually.
3. While not yet finalized, projected enrollment data for the period July 1, 2019 -June 30, 2020 is consistent with the 2018-2019 period, supporting the rationale for an alternative allocation formula.

For the above reasons, New York State proposes the addition of other programs of economically disadvantaged eligibility to Pell Grants for use in the formula distribution of Perkins V Postsecondary funds.

C8 Reserve funds

New York state will award reserve funds to innovative projects following the Pathways in Technology Early College High School P-TECH) model. The New York State Education Department will fund programs through a competitive grant process. Eligible applicants are formed from partnerships of school districts, higher education institutions, and committed business/employers. Program proposals are evaluated based on the number of students to be served, the quality of the program design, and efficient use of funds.

The P-TECH model includes five core benefits to students: 1. A rigorous, relevant and cost-free grades 9 to 14 education focused on the knowledge and skills students need for Science, Technology, Engineering and Math (STEM) careers; 2. Workplace learning that includes ongoing mentoring by professionals in the chosen career sector, worksite visits, speakers, and internships; 3. Intensive, individualized academic support by K-12 and college faculty within an extended academic year or school day that enables students to progress through the program at their own pace; 4. An Associate of Applied Science degree or the two-year degree that is the industry standard for the targeted jobs in a high-tech field (referred to as an AAS degree for the purpose of this RFP); and 5. The commitment to be first in line for a job with the participating business/employer partners following completion of the program.

The award process conforms to that used by NYSED for all competitive grant awards. Criteria for awarding funds include the review of the following program elements:

- Location of the new program and transportation plans for students recognizing the extended day and year calendar;
- Creation of an up-to-date skills map by the business/employer partner for the industry/sector that identifies essential job requirements;

- The steering committee, with the support and participation of key leadership at each partner,
- Recruitment and selection of staff with appropriate licensure and experience (as needed);
- Design of a Six-Year Integrated Scope and Sequence for each career pathway reflecting all necessary high school and college coursework and work-based learning activities for students to complete a high school diploma, AAS degree, and master professional skills for the targeted jobs;
- Development of instructional modules for the first year of instruction;
- Identification, targeting, recruitment, and enrollment of a full complement of academically and economically at-risk students for the first cohort;
- Identification of individuals who will provide mentoring for students;
- Professional development for participating high school and higher education faculty has been conducted, and preparation of non-classroom program staff to offer adequate support to students has been completed; and
- Plan to address any local challenges for implementing the specific NYS P-TECH program design, including but not limited to transportation requirements, student recruitment from targeted population to meet enrollment goals, staffing particularly in STEM fields, etc.

C9 State's fiscal effort

Provide the State's fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary's annual determination on whether the State has maintained its fiscal effort and indicate whether the baseline is a continuing level or new level. If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)

Worksheet to Calculate Perkins MOE

	2016-17	2017-18
Special Services-Career Education Aid	\$157,187,916	\$156,046,811
BOCES Shared Services Aid (CTE)	\$378,111,691	\$389,443,640
State Administrative expense	\$1,243,869	\$1,243,869
Total State MOE	\$536,543,476	\$546,734,320

Career Education Aid

The city school districts having a population in excess of one hundred twenty-five thousand (New York City, Buffalo, Rochester, Syracuse, Yonkers) and any other school district that was not a component of a BOCES in the base year are entitled to aid for certain career education pupils in grades 10-12. Aid per pupil equals the career education aid ratio multiplied by \$3,900.

The formula for calculating Career Education Aid is:

$\$3,900 \times \text{Career Education Aid Ratio} \times \text{2017-18 Weighted Career Education Pupils}$

Weighted pupils is defined as the sum of the attendance of students in grades 10-12 in career education sequences in trade, industrial, technical, agricultural, or health programs plus 0.16 multiplied by the attendance of students in grades 10-12 career education sequences in business and marketing.

BOCES Shared Services Aid (CTE)

Shared Services Expense by BOCES from the Annual report "Financial and Statistical Outcomes of the Boards of Cooperative Educational Services" report (i.e., the Chapter 602 report).

State Administrative expense

Derived from the NYSED Office of Fiscal Management worksheet to calculate OMS, P-12, OHE PS, OTPS costs including the admin expenses associated with the NYS School for the Deaf at Rome and NYS School for the Blind at Batavia. Also includes a proportionate share of the state-paid salaries for the BOCES District Superintendents.

Percentage is calculated on the relative cost of CTE programs vs. total operating expenses.

PART D: ACCOUNTABILITY FOR RESULTS

D1 Program quality indicator

Identify and include at least one (1) of the following indicators of career and technical education program quality—

- a. the percentage of CTE concentrators (see Text Box 6 for the statutory definition of a CTE concentrator under section 3(12) of Perkins V) graduating from high school having attained a recognized postsecondary credential;
- b. the percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or
- c. the percentage of CTE concentrators graduating from high school having participated in work-based learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)

New York has selected the work-based learning program quality indicator. It is a component of approved programs that has the potential to impact the greatest number of students. Recent consultation with program directors and work-based learning coordinators helped identify the types of support most needed in the field. Most proposals relate to providing standardized training and templates (e.g., statewide core training for coordinators and workplace mentors, standardized templates for WBL student plans, activity journals, etc.).

Include any other measure(s) of student success in career and technical education that are statewide, valid, and reliable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins V) Please note that inclusion of “other” program quality measure(s) is optional for States.

New York State is not including other measures of student success at this time.

D1 c Quality indicator definition

Provide the eligible agency’s measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

Secondary definition for the work-based learning quality indicator

Code	Indicator	Numerator	Denominator
5S3	Program Quality– Participated in Work- Based Learning	CTE concentrators in the most recent exiting graduation cohort who have participated in 54 hours of work-based learning and have graduated high school.	Total number of CTE concentrators in the most recent four-year graduation cohort who have graduated high school.

D2 State determined performance levels

Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined performance levels or each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the State. (Section 113(b)(3)(A)(i)(I) of Perkins V)

See Section V

D3 Procedures to determine SDPLs

Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—

D3 a Public comment process.

a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance.²⁷ (see Text Box 7 for the

Public comment on proposed performance levels was sought through a number of channels including

- publication on the CTE website with notice to [all] districts of their opportunity to provide feedback on the definitions and /or target levels
- direct distribution to the State CTE Advisory Panel with a follow-up meeting to discuss
- CTE content area listservs
- meetings with district superintendents of the state's 37 service area regions
- presentation to the Board of Regents attended by members of the public and press; subsequent posting of the report to the Board of Regents to the Board's meeting summary pages.

²⁷ statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V) are:

(B) PUBLIC COMMENT.—

IN GENERAL.—Each eligible agency shall develop the levels of performance under subparagraph (A) in consultation with the stakeholders identified in section 122(c)(1)(A).

WRITTEN COMMENTS.—Not less than 60 days prior to submission of the State plan, the eligible agency shall provide such stakeholders with the opportunity to provide written comments to the eligible agency, which shall be included in the State plan, regarding how the levels of

performance described under subparagraph (A)— (I) meet the requirements of the law;

(II) support the improvement of performance of all CTE concentrators, including subgroups of students, as described in section 111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48); and (III) support the needs of the local education and business community.

ELIGIBLE AGENCY RESPONSE.—Each eligible agency shall provide, in the State plan, a written response to the comments provided by stakeholders under clause (ii).

D3 b an explanation for the State determined levels of performance that meet each of the statutory requirements in (Section 113(b)(3)(A)(i)(III) of Perkins V)

New York's state determined levels of performance meet the requirements of Section 113(b)(3)(A)(i)(III) of Perkins V inasmuch as they:

- (aa) are expressed as a percentage
- (bb) project incremental improvements in all indicators
- (cc) have been subject to the public comment process described in Section 113(b)(3)(A)(i)(III) of Perkins V
- (dd) when being adjusted pursuant to clause (ii), take into account how the levels of performance involved compare with the State levels of performance established for other States, considering factors including the characteristics of actual (as opposed to anticipated) CTE concentrators when the CTE concentrators entered the program, and the services or instruction to be provided;
- (ee) when being adjusted pursuant to clause (ii), be higher than the average actual performance of the 2 most recently completed program years, except in the case of unanticipated circumstances that require revisions in accordance with clause (iii); and
- (ff) take into account the extent to which the State determined levels of performance advance the eligible agency's goals, as set forth in the State plan

D3c Description of SDPL alignment and baseline

- c. a description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

Secondary process

New York's secondary academic indicators are based on the levels, goals and objectives of ESSA. The ESSA accountability structure was built to provide districts with the information needed to target resources to where they are most needed. The broad themes of data-driven program development for school improvement, teacher development, and provision of student supports found in New York's ESSA Plan, are reiterated and reinforced in our Perkins V Plan.

Definitions and baselines for New York's Perkins academic indicators for ELA, mathematics, science, and graduation will be drawn from the same source, the Total Cohort Regents Results. Students in the four-year cohort as of June 30th of the current reporting year (Cohort). It includes the following subgroups: not tested (Not Tested) and tested (Tested) on Regents examinations, performing at each of the performance levels (Level 1, Level 2, Level 3, Level 4, and Level 4 and above), and scoring Proficient (Level 3 and above for ELA & mathematics, Levels 3 & 4 for science). Perkins V indicators will be disaggregated by subgroup in the same manner as in ESSA reporting. District data contain data for all schools in the district as well as out-of-district placement students who are the reporting responsibility of the district.

Secondary baseline

To establish our baseline for Perkins four-year graduation rate, we used the most recent year's ESSA four-year graduation results. New York's ESSA graduation rate targets increase by 2.054% each year and this is the framework we will apply in determining our state determined performance levels on the Perkins graduation and academic indicators.

CTE specific indicators for post-program placement (3S1) and non-traditional concentration (4S1) use the average performance for three years of Perkins outcome data for post-program placement (5S1) and nontraditional completion (6S2 in Perkins IV). Perkins IV nontraditional completion data was used because, unlike the it reports on the performance of concentrators. The average difference in yearly Perkins IV performance for 5S1 and 6S2 was used as the multiplier to calculate the increments for progress for the next four program years (i.e., until 2023-24). For placement the average rate of change is .0020 each year, and for non-traditional completion, it is .0052.

New York has selected participation in work-based learning as the program quality indicator (5S3). Work-based learning is already built into the structure of approved programs. Program-level work-based learning data is not currently reported to the state's data warehouse. Changes to CTE data reporting will address this beginning in the 2019-20 school year.

To establish state developed performance levels for the next four years, we will use data that the CTE program office collects applications for CTE program re-approval. The NYSED CTE office data is the only program-level data available. WBL participation on applications for CTE program reapproval ranges from 25% to 100 % (as would be true in certified nurse assistant programs with required hours of clinical experience). The Perkins program quality indicator baseline of 62.5% was determined by using the midpoint of this range. The multiplier of 0.0254 used for the ESSA indicator is used to project expected improvements. See tables in Section V for performance indicator and targets.

Postsecondary process

In developing Proposed Core Indicator of Performance Levels, the postsecondary Perkins office considered the following factors:

Perkins V legislation lists three Core Indicators, which differ from the six Core Indicators provided in Perkins IV. Some of these new Core Indicators have similarities to the previous Indicators, but none are taken verbatim from the previous legislation. Therefore, it was not possible to directly crosswalk the old data to establish new Performance levels.

The overlap that does exist between the Perkins IV Core Indicators and the Perkins V Core Indicators allows us to use the last four years of data to establish benchmarks.

The Target Levels will increase in each of the next four years in order to ensure continuous improvement at the institutions and at the state level.

Because many recipient institutions will make major changes to their programming in the 2020 and 2021 grant years, they will need time to establish this new programming and to problem solve as issues arise. Therefore, we expect their Core Indicator performance to waver somewhat during the first two years of this Four-Year Plan. Some will surely find early success, whereas others might struggle more.

They will also need time to establish new baselines for data.

For many years, the New York State Education Department has used the data submission system called HEDSLive. NYSED will use this system for one final year in 2020; thereafter, it will use a new system called IDEX. Typically, the first year of data reporting under any new system brings unexpected challenges and delays, which can ultimately lead to weaker data.

D4 Responding to public comments

Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V).

As part of the written response, include a description of any the changes made to the State determined performance levels as a result of stakeholder feedback.

Stakeholders based their comments on the follow indicator definitions

Secondary indicator definitions

Code	Indicator	Numerator	Denominator
1S1	Four-year graduation cohort rate	CTE concentrators in the most recent exiting graduation cohort who earned a Regents or local diploma, including August graduates.	Total number of CTE concentrators in the most recent four-year graduation cohort.
2S1	Academic proficiency in English language arts	CTE concentrators in the most recent exiting graduation cohort who earned a Level 3 (proficient) or above on a Regents ELA assessment as of June 30 of their fourth year of high school.	Total number of CTE concentrators in the most recent four-year graduation cohort.
2S2	Academic proficiency in mathematics	CTE concentrators in the most recent exiting graduation cohort who earned a Level 3 (proficient) or above on a Regents mathematics assessment as of June 30 of their fourth year of high school.	Total number of CTE concentrators in the most recent four-year graduation cohort.
2S3	Academic proficiency in science	CTE concentrators in the most recent exiting graduation cohort who earned a Level 3 (proficient) or above on a Regents science assessment as of June 30 of their fourth year of high school.	Total number of CTE concentrators in the most recent four-year graduation cohort.
3S1	Post-Program Placement	The number of CTE concentrators in the prior year's four-year graduation cohort who, in the second quarter after exiting from secondary education, are in postsecondary education or advanced training, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed.	Total number of CTE concentrators in the prior year's four-year graduation cohort.
4S1	Non-Traditional Program Concentration	CTE concentrators enrolled in CTE programs that are non-traditional for their gender in the reporting year. ¹	Total number of CTE concentrators enrolled in CTE programs that lead to non-traditional fields in the reporting year.
5S3	Program Quality–Participated in Work-Based Learning	CTE concentrators in the most recent exiting graduation cohort who have participated in 54 hours of work-based learning and have graduated high school.	Total number of CTE concentrators in the most recent four-year graduation cohort who have graduated high school.

Secondary Comments Summary	
<p>Big Five Cities: “the targets aggressive,” and possibly unattainable for the Big Five districts who serve large numbers of high-need students.</p>	<p><i>The academic indicators for English and math are the same used for Perkins IV. Report cards from the past several years show that Big 5 students as a whole meet at least 90 % of the targets for ELA and math. In Perkins accountability, the 90 % threshold is sufficient and does not require an improvement plan. Perkins IV did require that recipients look at the special populations not meeting this threshold and develop efforts to improve.</i></p> <p><i>Perkins V continues with a more specific accountability model by requiring recipients to focus more on the groups of students not achieving the targets at the program level.</i></p>
<p>BOCES: While the indicators are not inappropriate, some are not areas in which a BOCES has much impact on when students only attend the CTE programs offered by BOCES for the half a day in 11th and 12th, grade. The indicators identified may not be a true representation of the success students have in CTE or a quality indicator for a BOCES CTE program, but rather that of the home district of the students. Given the fact that BOCES will now be held accountable to these standards, we recommend that the Department provide additional guidance on how BOCES' will respond to indicators that may not be fully under our control, or, provide additional guidance on how a BOCES will or will not be responsible for indicators that may not be under our organization's direct control.</p>	<p><i>The academic indicators for English and math are the same used for Perkins IV. Report cards from the past several years show that BOCES students as a whole exceed the state average for ELA and math. The change that Perkins V brings is for recipients to focus more on the groups of students not achieving the targets.</i></p>

Comments received for secondary-level SDPLs were focused on the following areas of concern:

Postsecondary indicator definitions

Code	Indicator	Numerator	Denominator
1P1	Postsecondary Retention and Placement	Number of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are placed or retained in employment.	Number of CTE concentrators who completed their program in the reporting year.
2P1	Earned Recognized Postsecondary Credential	Number of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion.	Number of CTE concentrators who left postsecondary education in the prior reporting year.
3P1	Non-Traditional Program Concentration	Numerator: Number of CTE concentrators, from underrepresented gender groups, in career and technical education programs and programs of study that lead to non-traditional fields.	Number of CTE concentrators in a CTE program or program of study that leads to a nontraditional field, during the reporting year.

Stakeholder feedback	NYSED Response
<p>Proposed graduation rate: given that the current state-wide graduation rate is 24%, a proposed goal of 42-43.5% (goal 2P1) is both ambitious and unrealistic.</p> <p>— Recommendation: proposed goal to be more aligned with the current state average with a “stretch goal” OR allow each college to set their own graduation rate based on performance trends</p>	<p>After considering stakeholder feedback NYSED has adjusted the targets for the 2P1 Core Indicator for the 2021 year to 33.00%.</p> <p>Note that the 24% state-wide graduation rate captures all majors at all New York State community colleges. CTE students at Perkins-recipient institutions graduate at an average rate, over the last three years, of 46%, according to data submitted by the institutions.</p>

Proposed Core Indicator Targets

Postsecondary Indicators	Baseline	FY 2021	FY 2022	FY 2023	FY 2024
1P1	64.00%	64.50%	64.75%	65.00%	65.25%
2P1	32.50%	33.00%	33.25%	33.50%	33.75%
3P1	24.00%	24.50%	24.75%	25.00%	25.25%

D5 Addressing performance gaps

Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V) (minimum required set-asides, technical assistance)

As part of the written response, and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP),⁸ the eligible agency could indicate that it will analyze data on the core indicators of performance to identify gaps in performance, explain how they will use evidence-based research to develop a plan to provide support and technical assistance to eligible recipients to address and close such gaps, and how they will implement this plan. The eligible agency is not required to submit a new State plan prior to the third program year in order to address this requirement.

More complete data will improve the CTE Office's ability to identify where supports are most needed. Gaps in performance cannot be closed by Perkins programs alone. Many factors contribute to disparities

in student achievement. The funding model used by New York has provisions that address the large differences in resources among the wealthiest and poorest districts in the state, but that does not remove the opportunity gaps experienced by students in low resourced districts.

The P-12 CTE Office intends to use leadership resources on activities that better target the CTE students and programs needing the most assistance. Program-level data will give the necessary view of programs needing improvement. Workplans for the next CTE technical assistance center will be structured to allocate available services according to need as revealed in performance data.

The postsecondary Perkins office will encourage, in the application, all potential recipients to focus their efforts on identifying gaps in performance and creating programming that will actively address these gaps.

Additionally, the postsecondary office will provide ongoing technical assistance to all recipients as they identify and address gaps in performance, and as they problem solve in their efforts to help all CTE students, particularly those in special populations.

Further, the postsecondary office will consider the use of Minimum Required Set-Asides. Perkins IV implementation included several set-asides for postsecondary recipients. For 2019-20 and the 2020-21 Perkins V programs NYSED has reduced the number to one. This set-aside will target funds to support the success of students with disabilities. Future set-asides will be determined by performance data. As in the past, a certain percentage of allocations will be dedicated to a targeted group.

Both secondary and postsecondary offices look forward to having more detailed data to inform services and action plans.

III. ASSURANCES, CERTIFICATIONS, AND OTHER FORMS

A. Statutory Assurances

The eligible agency assures that:

1. It made the State plan publicly available for public comment⁹ for a period of not less than 30 days, by electronic means and in an easily accessible format, prior to submission to the Secretary for approval and such public comments were taken into account in the development of this State plan. (Section 122(a)(4) of Perkins V)
2. It will use the funds to promote preparation for high-skill, high-wage, or in-demand industry sectors or occupations and non-traditional fields, as identified by the State. (Section 122(d)(13)(C) of Perkins V)
3. It will provide local educational agencies, area career and technical education schools, and eligible institutions in the State with technical assistance, including technical assistance on how to close gaps in student participation and performance in career and technical education programs. (Section 122(d)(13)(E) of Perkins V)
4. It will comply with the requirements of this Act and the provisions of the State plan, including the provision of a financial audit of funds received under this Act, which may be included as part of an audit of other Federal or State programs. (Section 122(d)(13)(A) of Perkins V)
5. None of the funds expended under this Act will be used to acquire equipment (including computer software) in any instance in which such acquisition results in a direct financial benefit to any organization representing the interests of the acquiring entity or the employees of the acquiring entity, or any affiliate of such an organization. (Section 122(d)(13)(B) of Perkins V)
6. It will use the funds provided under this Act to implement career and technical education programs and programs of study for individuals in State correctional institutions, including juvenile justice facilities. (Section 122 (d)(13)(D) of Perkins V)

B. EDGAR Certifications _

By submitting a Perkins V State Plan, consistent with 34 CFR 76.104, the eligible agency certifies that:

1. It is eligible to submit the Perkins State plan.
2. It has authority under State law to perform the functions of the State under the Perkins program(s).
3. It legally may carry out each provision of the plan.
4. All provisions of the plan are consistent with State law.
5. A State officer, specified by title in Item C on the Cover Page, has authority under State law to receive, hold, and disburse Federal funds made available under the plan.
6. The State officer who submits the plan, specified by title in Item C on the Cover Page, has authority to submit the plan.
7. The entity has adopted or otherwise formally approved the plan.
8. The plan is the basis for State operation and administration of the Perkins program.

C. Other Forms _

The eligible agency certifies and assures compliance with the following enclosed forms:

1. Assurances for Non-Construction Programs (SF 424B) Form (OMB Control No. 0348-0040) - <https://www2.ed.gov/fund/grant/apply/appforms/sf424b.pdf>
2. Disclosure of Lobbying Activities (SF LLL) (OMB Control No. 4040-0013):
https://apply07.grants.gov/apply/forms/sample/SFLLL_1_2-V1.2.pdf
3. Certification Regarding Lobbying (ED 80-0013 Form):
<https://www2.ed.gov/fund/grant/apply/appforms/ed80-013.pdf>
4. General Education Provisions Act (GEPA) 427 Form (OMB Control No. 1894-0005):
<https://www2.ed.gov/fund/grant/apply/appforms/gepa427.pdf>

IV. BUDGET

B: Budget Form [2019-20 budget used for reference only 20-21 budget is pending]

State Name: New York State

2019-20

Line Number	Budget Item	Percent of Funds	Amount of Funds
1	Total Perkins V Allocation	Not applicable	\$ 56,867,904
2	State Administration	%	\$ 1,243,869
3	State Leadership	%	\$ 5,686,789
4	<input type="checkbox"/> Individuals in State Institutions	%	\$
4a	- Correctional Institutions	Not required	\$ 296,685
4b	- Juvenile Justice Facilities	Not required	\$ 272,012
4c	- Institutions that Serve Individuals with Disabilities	Not required	\$ 0
5	<input type="checkbox"/> Non-traditional Training and Employment	Not applicable	\$ 150,000
6	<input type="checkbox"/> Special Populations Recruitment	%	\$ 50,000
7	Local Formula Distribution	%	\$ 49,937,246
8	<input type="checkbox"/> Reserve	%	\$ 2,400,000

9	- Secondary Recipients	100%	\$ 2,400,000
10	- Postsecondary Recipients	%	\$
11	□ Allocation to Eligible Recipients	%	\$ 47,537,246
12	- Secondary Recipients	52%	\$ 24,719,368
13	- Postsecondary Recipients	48%	\$ 22,817,878
14	State Match (from non-federal funds)	Not applicable	\$ 1,243,869

V. STATE DETERMINED PERFORMANCE LEVELS

New York State's Perkins V Proposed Performance Levels for Secondary Programs					
Secondary Indicators	Baseline Level	Proposed Performance Levels			
		FY 2020	FY 2021	FY 2022	FY 2023
1S1: Four-Year Graduation Rate	81.80%	82.30%	84.40%	89.70%	92.50%
2S1: Academic Proficiency in English Language Arts	85.00%	87.16%	89.37%	91.64%	93.97%
2S2: Academic Proficiency in Mathematics	83.00%	85.11%	87.27%	89.49%	91.76%
2S3: Academic Proficiency in Science	83.00%	85.11	87.27%	89.49%	91.76%
3S1: Post-Program Placement	97.35%	97.54%	97.74%	97.93%	98.12%
4S1: Non-traditional Program Concentration	25.95%	26.09%	26.22%	26.36%	26.49%
5S3: Program Quality–Work-based Learning	62.50%	64.09%%	65.72%	67.38%	69.10%

Proposed Core Indicator Targets					
Postsecondary Indicators	Baseline	FY 2021	FY 2022	FY 2023	FY 2024
1P1	64.00%	64.50%	64.75%	65.00%	65.25%
2P1	32.50%	33.00%	33.25%	33.50%	33.75%
3P1	24.00%	24.50%	24.75%	25.00%	25.25%

ATTACHMENT 1: NEW YORK STATE'S PUBLIC HEARINGS

Counts of Participant Type

16	Academic teachers, faculty and administrators
56	Career and technical education teachers, faculty and administrators
24	Representatives of eligible secondary providers
16	Representatives of eligible postsecondary providers
32	Interested community members, including parents, students and community organizations
2	Representatives of business and industry
9	Representatives of labor organizations

As publicized by the NYS TAC

On Homepage of CTETAC Site:

CTE BLOG

PUBLIC INPUT ON PLANS FOR IMPROVING CTE IN NEW YORK (PERKINS V PLAN)

Dick Jones, *Center Specialist*, November 2019

The Strengthening Career and Technical Education for the 21st Century Act (Perkins V) provides federal funds to NYS to improve CTE. The revised act approved last year went into effect on July 1, 2019. New York submitted a one-year transition plan in May 2019 to guide 2019-20 funding. The next step is the draft four-year state plan which was presented to the NYS Board of Regents on November 4, 2019.

[Read More](#)



EVENTS

Jan Public Hearing on
7 Perkins V State Plan
January 7, 2020 4:00 pm - 7:00

pm
UFT Headquarters- NYC

[Register Here](#)

CTE NEWS

PERKINS V STATE PLAN PUBLIC HEARINGS

The New York State Education Department has scheduled three formal public hearings to gather input/comments from the public regarding the four-year plan. Those wishing to present oral testimony about the State Plan at the meetings should complete a pre-registration form. **You may register here.**

The next public hearing will be held January 7th, 2020 at UFT Headquarters in NYC.

[Read More](#)

PDF copies of the main registration page, and an individual registration form are included in attachments. The only active pages as of the date of request is the main registration page and the individual page for January 7th hearing. The other two dates had identical registration pages.

Public Hearing on Perkins V State Plan - December 10, 2019

Sorry Registration for this event ended on December 10th, 2019 3:30 PM

Registration is closed for this event

Public hearing on Perkins V State Plan Location: OCM BOCES - Liverpool, NY Time: 4PM-7PM

When

December 10th, 2019 4:00 PM through 7:00 PM

Location

110 Elwood Davis Rd
OCM BOCES
Liverpool, NY 13088

The screenshot shows a web browser window with the URL nyccenter.org. The page content is organized into three vertical columns:

- EVENTS:**
 - Jan 7** **Public Hearing on Perkins V State Plan**
January 7, 2020 4:00 pm - 7:00 pm
UFT Headquarters- NYC
[Register Here](#)
 - Mar 11** **Spring PBL Academy - Hilton Garden Inn | Clifton Park, NY**
March 11, 2020 10:00 am - April 24, 2020 3:00 pm
SPRING SESSION (Register Here)
March 11, 2020
March 24, 2020
April 23, 2020
 - Mar 25** **Assessing Project-Based Learning - Hilton Garden Inn | Clifton Park, NY**
March 25, 2020 10:00 am - 3:00 pm
[Learn More and Register Here](#)
 - Apr 21** **Assessing Project Based Learning - Hilton Long**
- CTE NEWS:**
 - PERKINS V STATE PLAN PUBLIC HEARINGS**
The New York State Education Department has scheduled three formal public hearings to gather input/comments from the public regarding the four-year plan. Those wishing to present oral testimony about the State Plan at the meetings should complete a pre-registration form. [You may register here.](#)

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[Read More](#)
 - FACS VACANCY: COLUMBIA HIGH SCHOOL (ANTICIPATION OF NEED, PENDING BUDGET)**
The East Greenbush Central School District is creating a new CTE Pathway in Human Services and will be hiring a FACS teacher for this HS level position (or to
- TWITTER FEED:**
 - Jan 06, 2020
RT @SpohnConnie: The best part of these nominations is 5 of them are from Career and Technical Education programs! Last year one of 5 NY C...
<https://t.co/2KH0nTn02p>
 - Jan 06, 2020
RT @WhyMaker: Love this!
<https://t.co/0SLTg1WSge>
 - Jan 06, 2020
RT @CareerTecTweets: China Moody from #troj, "has a passion for helping people." She chose the @CapRegionBOCES Adult Practical Nursing prog...
<https://t.co/AuqbaBcEdb>
 - Dec 22, 2020
RT @WhyMaker: Edison Robots and High School Math class!!! @goshen You CAN incorporate STEAM into Math Classes! You can make learning more...
<https://t.co/bfzblxGPY>
 - Dec 22, 2020


nyctecenter.org

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[Read More](#)



nyctecenter.org/PerkinsVPublicHearings

PERKINS V STATE PLAN PUBLIC HEARINGS

Please select the Perkins V State Plan Public Hearing you wish to attend from the options below.

If you experience any technical difficulties while attempting to register, please contact the CTETAC at ctetac@spnet.us or by phone at 518.723.2137 for assistance.

- December 10, 2019
4PM - 7PM
OCM BOCES - Liverpool, NY
[Register Here](#)
- December 12, 2019
4PM - 7PM
Capital Region BOCES - Albany, NY
[Register Here](#)
- January 7, 2020
4PM - 7PM
UFT Headquarters - NYC
[Register Here](#)

nyctecenter.org/perkinsvhearingjan7

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PERKINS V PUBLIC HEARING - JANUARY 7, 2020

Public Hearing on Perkins V State Plan - January 7, 2020

Register below to indicate attendance at the Perkins V State Plan Public Hearing.

January 7, 2020
4PM-7PM
UFT Headquarters
52 Broadway
Shankar Hall
NYC

Perkins V State Plan Public Hearing Attendee

First Name*

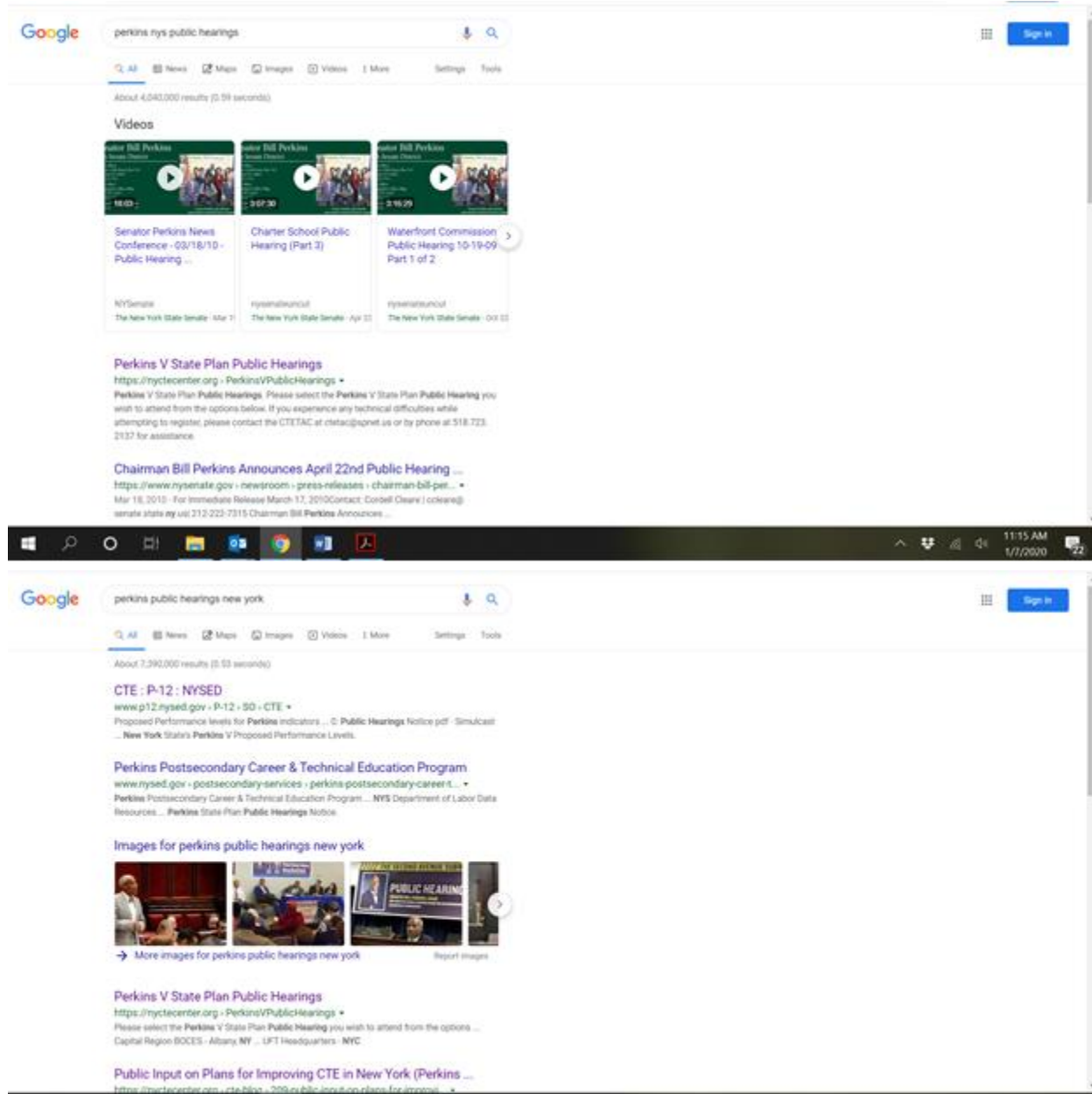
Last Name*

Email*

Organization

Title

Google placement – showing TAC site Search engine optimization. People could easily find registration/hearings info with simple google searches.



POSTSECONDARY ALLOCATIONS

[2019-20 used as reference]

Institution	Total Perkins Students * 2017	All Institution Students Receiving Pell Aid 2017 **	Difference	Allocation Amount (\$) With Total Perkins Student Counts	Allocation Amount (\$) Using All Institution Pell Student Counts
CLINTON COMMUNITY COLLEGE	713	583	-130	\$141,872	\$116,005
ADIRONDACK COMMUNITY COLLEGE	2102	1,367	-735	\$418,255	\$272,005
SUNY COLLEGE OF TECHNOLOGY AT ALFRED	1807	1,945	138	\$359,556	\$387,016
BOROUGH OF MANHATTAN COMM COLLEGE	17199	16,721	-478	\$3,422,257	\$3,327,144
BRONX COMMUNITY COLLEGE	7837	7,624	-213	\$1,559,406	\$1,517,023
BROOME COMMUNITY COLLEGE	4082	2,891	-1,191	\$812,236	\$575,251
SUNY COLLEGE OF TECHNOLOGY AT CANTON	825	1,809	984	\$164,158	\$359,954
CAYUGA COUNTY COMMUNITY COLLEGE	1341	1,280	-61	\$266,832	\$254,694
SUNY COLLEGE OF AGRICULTURE AND TECHNOLOGY AT COBLESKILL	840	1,180	340	\$167,143	\$234,796
VAUGHN COLLEGE OF AERONAUTICS AND TECHNOLOGY	1087	809	-278	\$216,291	\$160,974
CITY UNIVERSITY OF NEW YORK COLLEGE OF STATEN ISLAND	2698	5,736	3,038	\$536,848	\$1,141,349

Institution	Total Perkins Students * 2017	All Institution Students Receiving Pell Aid 2017 **	Difference	Allocation Amount (\$) With Total Perkins Student Counts	Allocation Amount (\$) Using All Institution Pell Student Counts
STATE UNIVERSITY OF NEW YORK COLLEGE OF TECHNOLOGY AT DELHI	1283	1,546	263	\$255,291	\$307,623
FINGER LAKES COMMUNITY COLLEGE	2363	1,802	-561	\$470,189	\$358,561
CORNING COMMUNITY COLLEGE	1661	1,296	-365	\$330,505	\$257,878
CULINARY INSTITUTE OF AMERICA	2982	775	-2,207	\$593,358	\$154,209
DUTCHESS COMMUNITY COLLEGE	4435	2,219	-2,216	\$882,476	\$441,536
ERIE COMMUNITY COLLEGE	6505	4,776	-1,729	\$1,294,364	\$950,328
FASHION INSTITUTE OF TECHNOLOGY	4675	2,389	-2,286	\$930,231	\$475,363
FULTON-MONTGOMERY COMMUNITY COLLEGE	1405	1,051	-354	\$279,566	\$209,127
GENESEE COMMUNITY COLLEGE	3007	2,173	-834	\$598,332	\$432,383
HERKIMER COUNTY COMMUNITY COLLEGE	1475	1,248	-227	\$293,495	\$ 248,327
EUGENIO MARIA DE HOSTOS COMM COLLEGE	6717	4,679	-2,038	\$1,336,548	\$931,027
HUDSON VALLEY COMMUNITY COLLEGE	6172	3,095	-3,077	\$1,228,104	\$615,843
JAMESTOWN COMMUNITY COLLEGE	1734	1,582	-152	\$345,031	\$314,786

Institution	Total Perkins Students * 2017	All Institution Students Receiving Pell Aid 2017 **	Difference	Allocation Amount (\$) With Total Perkins Student Counts	Allocation Amount (\$) Using All Institution Pell Student Counts
JEFFERSON COMMUNITY COLLEGE	2071	1,591	-480	\$412,087	\$316,577
KINGSBOROUGH COMMUNITY COLLEGE	7379	6,969	-410	\$1,468,273	\$1,386,691
FIORIELLO HGUARDIA COMM COLLEGE	11816	8,507	-3,309	\$2,351,147	\$1,692,722
MEDGAR EVERS COLLEGE	1424	4,115	2,691	\$283,347	\$818,802
MOHAWK VALLEY COMMUNITY COLLEGE	3069	2,747	-322	\$610,669	\$546,598
NASSAU COMMUNITY COLLEGE	8215	7,933	-282	\$1,634,620	\$1,578,508
CUNY NYC COLLEGE OF TECHNOLOGY	7400	8,903	1,503	\$1,472,452	\$1,771,518
NIAGARA COUNTY COMMUNITY COLLEGE	3256	2,262	-994	\$647,878	\$450,092
NORTH COUNTRY COMMUNITY COLLEGE	872	540	-332	\$173,510	\$107,449
ORANGE COUNTY COMMUNITY COLLEGE	2069	1,924	-145	\$411,689	\$382,837
QUEENSBOROUGH COMMUNITY COLLEGE	8909	7,261	-1,648	\$1,772,712	\$1,444,793
CUNY STELLA AND CHARLES GUTTMAN COMMUNITY COLLEGE	470	700	230	\$93,520	\$139,286
ROCKLAND COMMUNITY COLLEGE	4388	1,862	-2,526	\$873,124	\$370,500

Institution	Total Perkins Students * 2017	All Institution Students Receiving Pell Aid 2017 **	Difference	Allocation Amount (\$) With Total Perkins Student Counts	Allocation Amount (\$) Using All Institution Pell Student Counts
SCHENECTADY COUNTY COMMUNITY COLLEGE	2221	1,776	-445	\$441,934	\$353,388
SUFFOLK COUNTY COMMUNITY COLLEGE	9751	7,049	-2,702	\$1,940,253	\$1,402,610
SULLIVAN COUNTY COMMUNITY COLLEGE	757	666	-91	\$150,627	\$132,520
TOMPKINS CORTLAND COMMUNITY COLLEGE	2036	1,464	-572	\$405,123	\$291,306
ULSTER COUNTY COMMUNITY COLLEGE	1286	841	-445	\$255,888	\$167,342
BRONX COMMUNITY COLLEGE EOC	655	0	-655	\$130,331	\$1,517,023
COLUMBIA-GREENE COMMUNITY COLLEGE	532	605	73	\$105,857	\$120,382
MARIA COLLEGE OF ALBANY	404	392	-12	\$80,387	\$78,000
SUNY COLLEGE OF AGRICULTURE AND TECHNOLOGY AT MORRISVILLE	1491	1,636	145	\$296,679	\$325,531
SUNY COLLEGE OF TECHNOLOGY AT FARMINGDALE	976	2,822	1,846	\$194,204	\$561,521
ONONDAGA COMMUNITY COLLEGE	5653	3,934	-1,719	\$1,124,833	\$782,787
STATE UNIVERSITY OF NEW YORK AT BUFFALO EOC	191	0	-191	\$38,005	\$ -
WESTCHESTER COMMUNITY COLLEGE	7444	4,653	-2,791	\$1,481,207	\$925,853

Institution	Total Perkins Students * 2017	All Institution Students Receiving Pell Aid 2017 **	Difference	Allocation Amount (\$) With Total Perkins Student Counts	Allocation Amount (\$) Using All Institution Pell Student Counts
MONROE COMMUNITY COLLEGE	6880	6,415	-465	\$1,368,982	\$1,276,456
TROCAIRE COLLEGE	1191	714	-477	\$236,985	\$142,071
STATE UNIVERSITY OF NEW YORK COLLEGE AT BROCKPORT - COOPER HALL EOC	1200	0	-1,200	\$238,776	\$ -
Grand Total	188,951	158,857	-30,094	\$37,597,469	\$31,609,365
<i>Note: Total Perkins Student Counts is UNDUPLICATED (students in two or more programs at one institution are only counted once)</i>					
* - This unduplicated count is obtained from 2017 CTEA data collected by NYSED					
** - This count is obtained from 2017 NCES data maintained at College Navigator website					