



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF CAREER, TECHNICAL, AND ADULT EDUCATION

PROGRAM MEMORANDUM OCTAE 24-1

October 26, 2023

Dear Colleague:

Your state has an opportunity in 2024 to establish a single, unifying vision for how funding for multiple federal education and workforce development programs can be brought together to promote economic mobility and strengthen your state's economy. State¹ plans authorized by the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education (CTE) for the 21st Century Act (Perkins V), and the Workforce Innovation and Opportunity Act (WIOA), provide many policy levers that a state can use to advance its education, workforce, and economic development goals. The purpose of this letter is to highlight several critical policy levers available to Governors and other state education and workforce leaders through the Perkins V state planning process, including some that may not have been fully utilized by states in the past.

A majority of governors focused on expanding and improving CTE and workforce development opportunities in their 2023 State of the State addresses.² In 2024, governors and other state leaders can build on this commitment and continue to advance their state's future by strengthening their state's education-to-workforce system. Specifically, Perkins V requires each state to submit either 1) a new 4-year state plan, or 2) revisions to establish its state-determined performance levels for Fiscal Year (FY) 2024, along with any other revisions to its approved 4-year state plan (Perkins V section 122(a)(2) and (5)). Regardless of which option states pursue, the 2024 Perkins V state plan process gives states the opportunity to conduct broad stakeholder consultation and to elevate CTE as a core strategy to improve student outcomes and strengthen the economy.³ More information on the Perkins V state plan process can be found [here](#).

Similarly, WIOA requires each state to submit a Unified or Combined state plan that outlines a 4-year strategy for the six core WIOA programs (WIOA sections 102(a) and 103(a)(1)). In 2024, states must submit new 4-year Unified or Combined state plans and may include their Perkins V state plan as part of a WIOA Combined plan (Perkins V section 122(b)). States may also choose to collaborate on key activities, such as the state's vision and goals and sector strategies across WIOA and Perkins. More information on the WIOA state plan can be found [here](#).

For both Perkins V and WIOA, the state plan process is a tool that can be used by governors and other state leaders to connect their education and workforce systems and ensure that federal resources are utilized in the best interest of the states' vision. The Perkins V state planning process, alongside the

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

WIOA state planning process, is an opportunity for continued state leadership and the expression of policies that reflect how states respond to changing economic conditions and the needs of learners.

The Biden-Harris Administration is committed to supporting states to improve their education and workforce systems. Through [Investing In America](#)—which includes important legislation signed into law by President Biden, such as the [American Rescue Plan](#), [Bipartisan Infrastructure Law](#), [CHIPS and Science Act](#), and [Inflation Reduction Act](#)—the Administration is mobilizing historic levels of federal and private sector investments to create new, good-paying jobs in key industries such as advanced manufacturing, semiconductors, broadband, electric vehicles and batteries, clean energy, and infrastructure. In these industries, CTE programs are integral to develop a skilled workforce and reach communities and students in every state, including those that have too often been left behind. [Raise the Bar: Unlocking Career Success](#) is an interagency initiative led by the Department of Education to reimagine how our nation’s high schools prepare all students to thrive in their future careers. This initiative is rooted in research-based policies which states can reinforce through their Perkins V state plan.

This memorandum is organized under four policy areas, including: 1) state vision and goals, 2) accountability and data, 3) program quality and alignment, and 4) formula, leadership, and reserve funds—with specific guidance in each section and examples of states already implementing these policies. We encourage state leaders to review this memorandum as they create and expand policies within their Perkins V state plan to improve the quality of CTE programs and help students earn postsecondary degrees and industry credentials that our employers need and our economy demands.

1. State Vision and Goals

Through the Perkins V state plan, each state must create a vision and a set of goals to articulate how its education and training system will respond to economic, social, and labor market needs. The state plan can be used to codify system-wide credential and degree attainment goals, increase graduation and completion rates, and improve the job quality and economic outcomes of a diverse set of learners. It can also be used to set goals for how secondary and postsecondary institutions will work together and with employers, partner with the Office of the Governor, state agencies, and the public workforce system, as well as incorporate the voices of students, families, educators, employers, and other core stakeholders.

In the spring of 2024, each state must submit a new 4-year Perkins V state plan or updates to its existing plan and either a [Unified or Combined WIOA State Plan](#) to the U.S. Departments of Education and Labor. Regardless of how a state chooses to submit its Perkins V state plan, each state should create a strategic vision that puts learners and employers at the center of its education and workforce system, and establish goals within the Perkins V state plan and WIOA Unified or Combined state plan to create the types of partnerships, programs, and innovation necessary to improve the lives of its residents.

Both Perkins V and WIOA require state plans to include a description of the “state’s strategic vision and goals for preparing an educated and skilled workforce and for meeting the skilled workforce needs of employers,” as well as a description of how program funds will be leveraged to achieve the vision and

goals (Perkins V section 122(d)(3) and WIOA section 102(b)(1)(D) and (E)). Below are recommendations to meaningfully improve states' vision and goals during the state plan development process.

1a. Align the state's vision and goals to the economy of today and the future.

Perkins V state plans were last submitted in FY 2020 at the height of the COVID-19 pandemic, and no state has updated its plan vision or goals or the labor market information (LMI) it uses to align CTE programs to the current and future economy. Over the last three years, the economic needs of states have dramatically shifted, as have the needs of communities and learners. The pandemic radically transformed how we live, work, and learn. At present, we face a different set of economic challenges and opportunities than those we experienced before and during the pandemic. **We recommend that each state update its vision and goals to reflect current and projected economic conditions in addition to opportunities made possible through [Investing In America](#), and align LMI and in-demand occupations across its Perkins V and WIOA state plans.**

It is critical for each state to reassess its economic present and future and adjust strategies for what is now a different set of growing and declining industries, working conditions, occupations, and in-demand skills and credentials. Traditional and real-time LMI inform both immediate response and ongoing recovery efforts in a dynamic economic environment. Perkins V state leaders must work closely with different types of LMI and LMI offices, like those that support the state WIOA plan, to understand the needs of their economies and to determine the alignment of eligible recipients' CTE programs with those needs.⁴ States should also incorporate LMI data that is provided directly by business and industry, and seek feedback from its economic development office for those industries or occupations that are targeted for strategic investment and growth, like those connected to [Investing In America](#) and occupations that undergird state and local economies, like education and the care economy.

Exploring the LMI for your state will illuminate differences in labor market outcomes and skills among residents and throw a spotlight on the talent needs of your business and industry. This is an opportunity to establish state goals such as eliminating disparities in labor market outcomes by race, ethnicity, gender, disability status, age, and region; reengage adults who have left the job market and youth who have left school; increase the educational and skill attainment of the workforce to keep and grow existing industries and to attract new industries; and respond to skill shortages that are restraining state economic growth⁵. To the extent program goals are aligned, to make the best use of limited federal education and workforce development funds flowing to your state, your Perkins V and WIOA Unified or Combined state plans should be informed by the same LMI and articulate the same or complementary goals for the state.

State Example: Kentucky

Kentucky explicitly mentions the use of LMI for decision-making in its Perkins V state plan vision and goals. The state also outlines five priority sectors set by the *Kentucky* Workforce Innovation Board and ensures that CTE programs at the secondary and postsecondary levels are aligned to these priority sectors. In addition, *Kentucky* also provides access to robust [LMI data dashboards](#) which takes this

work a step further to make LMI available to eligible recipients to incorporate within their comprehensive local needs assessment (CLNA).

1b. Use “high-skill,” “high-wage,” and “in-demand” to connect CTE programs and good jobs.

Perkins V emphasizes supporting and improving CTE programs that prepare individuals for “high-skill, high-wage, *or* in-demand industry sectors or occupations.”⁶ Definitions of these terms should guide how CTE programs are eligible for federal funds and the types of occupations and [Good Jobs Principles](#) that your state would like to see anchor its education and training system. Additionally, while the law is structured to highlight CTE programs that prepare individuals for industry sectors or occupations that meet one of these criteria (i.e., “*or*” in statute), **we recommend that states ensure these definitions work together rather than separately, to make the most effective use of limited federal funds and to best serve students in CTE programs that lead to high-skill, high-wage, *and* in-demand careers.** If these definitions remain separate, CTE programs could conclude with students entering the workforce in occupations that are in-demand but require limited skills and provide no economic security. When strategically linked, CTE programs remain focused on growing occupations that provide economic security and skill development which contributes to a strong workforce and thriving communities.

Despite the critical importance of these terms, only 25 states have established definitions of “high-wage,” 24 states have definitions of “high-skill,” 26 states have definitions of “in-demand,” and fewer than half of the states, 22, have definitions of all three terms in their current Perkins V state plans. As a starting place for each state to review its current definitions or to create new ones, we recommend that it review the [Good Jobs Principles](#), published by the U.S. Departments of Commerce and Labor to define job characteristics. For a state that has already defined some or all of these terms, it should review its definitions and update them to ensure they meet this high standard. As an example, several states currently reference the minimum wage in their definition of “high-wage” which may no longer reflect the economic aspirations of these states for their CTE students.

The following provides examples of how states and other eligible entities can meet the statutory requirements related to providing high-skill, high-wage, or in-demand career preparation:

- **High-Skill:** A state’s definition of “high-skill” reflects occupations that require additional skills beyond a high school diploma, which can be demonstrated through the evaluation of skills and prior work experiences, such as those occupations that typically require a residency or demonstrated number of years of experience, an industry credential of value, a registered apprenticeship program, as well as two- and four-year degree programs.
 - We also recommend that states define the process for how industry credentials of value are determined and encourage states to work with employers as well as state and local workforce boards to support this determination.
- **High-Wage:** A state’s definition of “high-wage” reflects occupational earnings data that are measured through a valid and reliable source, such as the state LMI office, and either establish a common wage threshold that can be applied across occupations, such as the all industry statewide

median wage, or create or use a formula that calculates the living wage rate that a full-time worker would require to cover the costs of their family’s basic needs where they live, such as [MIT’s Living Wage Calculator](#).

- **In-Demand:** A state’s definition of “in-demand” specifies occupations across a state or region with a high number of annual job openings due to growth or expected growth within a given timeframe, which may also include occupational data that show current or projected future labor shortages, and may include occupations that the state deems essential, such as education, the care economy, and other occupations that are necessary to maintain society.
 - As a state approaches its definition, we recommend that states also consider the WIOA in-demand occupations list created by the state Workforce Development Board as well as industries and occupations that the state has identified as priorities for sector strategies and economic development, such as those industries and occupations that are needed to support Investing In America or addressing areas of critical need like educator shortages.

State Example: New Mexico

- **High-skill:** *New Mexico* defines “high-skill” as occupations that require the completion of an apprenticeship, industry-recognized certificate or credential, or a postsecondary certificate or degree.
- **High-wage:** *New Mexico* uses the term “living wage” in its definition of high-wage, which it considers to be 185 percent of the federal poverty guidelines for a family of three.
- **In-demand:** *New Mexico* considers “in-demand” careers as those where the (1) demand for a particular occupation exceeds supply; and (2) state, regional, or local labor market data document the demand.

1c. Support joint state planning, alignment, and coordination—particularly for youth.

Investing in youth is a core tenant across the U.S. Departments of Education and Labor (Departments), and the Departments envision a no-wrong-door and no-dead-ends approach to youth workforce systems. This includes the strategic alignment of education and training programs across federal investments such that when working together, they offer seamless access to high-quality programs, resources, and wrap-around services for learners. The Perkins V state plan process is an opportunity for state leaders to work with WIOA core partners, employers, postsecondary institutions including community colleges, sector-based industry coalitions, workforce intermediaries, labor unions, and philanthropy—who are each committed to high-quality career pathways for young workers. **We recommend that the state agency responsible for administering the Perkins V formula grant⁷ partner with agencies administering WIOA core programs and other agencies to strategically position Perkins-funded programs at the intersection of the state’s education and workforce systems.**

In many states, core programs under WIOA, such as the Title I Youth program, Title II Adult Education and Family Literacy Act (AEFLA) program, and Title IV Vocational Rehabilitation (VR) program can be further coordinated with Perkins funded CTE programs. When strategically aligned, these funds can be

braided⁸ to increase the capacity of CTE programs to support innovative education and employment strategies, like dual enrollment, career pathways, paid work-based learning, and career navigation that help young adults meet their employment and educational goals. States and local areas can leverage resources across CTE, Title I Youth, AEFLA, VR, and other workforce or community partners to ensure seamless service provision for youth, such as through co-location and co-enrollment strategies as well as through the provision of pre-employment transition services for students with disabilities under VR.

Additionally, WIOA and Perkins V place heightened emphasis on coordination and collaboration at the state and local levels among these programs to ensure a streamlined service delivery system for youth with barriers to employment⁹ and special populations,¹⁰ including youth with disabilities. Through the Perkins V state plan process, state and local workforce development boards, VR agencies, and educational agencies are required to have a strategy to coordinate agency-specific services with each other as well as with other agencies, such as partnerships with state Medicaid agencies, Centers for Independent Living, and state Intellectual and Developmental Disabilities (I/DD) agencies to better serve students with disabilities to expand occupational supports for learners, increase access to assistive technology and transportation services, and other pre-employment transition services.

State Example: Ohio

Ohio brought together six state agencies—the Departments of Education; Higher Education; Jobs; Family Services; and Aging to work with the Governor’s Office of Workforce Transformation and Opportunities for Ohioans with Disabilities—to develop the state’s 2020 WIOA Combined state plan, which includes the state’s plan for Perkins V. *Ohio* uses this strong foundation of inter-agency partnerships and workforce programs to implement new and innovative strategies that will continue to grow its economy and improve the health and well-being of its citizens.

2. Accountability and Data Systems

The Perkins V state plan includes important information about each state’s implementation of the Perkins V accountability system. This accountability system provides the state with a powerful tool to ensure LEAs, community and technical colleges, and other eligible recipients make investments of Perkins V dollars that result in better outcomes for students, including students from underrepresented racial and ethnic groups and special populations.¹¹ Perkins V identifies secondary and postsecondary performance indicators, specifies the student populations whose outcomes will be measured, defines the unit of measurement, e.g., “CTE concentrators,”¹² and outlines how the data must be reported to the Department and the public.

Because Perkins V significantly changed the law’s accountability provisions, including, for example, establishing a new statutory definition of CTE concentrator to whom the accountability provisions pertain and creating new performance indicators, many aspects of the system were new to states when they submitted their original Perkins V state plan in FY 2020. This made it difficult for a state to describe how its accountability model would function, project student performance and related state targets over the 4-year term of the original state plan, and establish local performance routines, including data

sharing and an explanation of how modifications to the state’s accountability model would be made should the need arise.

Each state is now equipped with three years of CTE student enrollment data and two years of student performance data using the new definition of CTE concentrator. In many states, the Perkins V indicators of performance have a high degree of similarity with measures of “[college and career readiness](#)” that states have established under the Elementary and Secondary Education Act of 1965, as amended (ESEA), and with measures that are established for in-school and out-of-school youth programs that operate under WIOA. To the extent practical, performance indicators developed under all three statutes (Perkins V, ESEA, and WIOA) should be completely aligned by using the same indicators, data collection, and public data sharing. By aligning the indicators for these three statutes, states could have a unified strategic focus on youth workforce development that leads to amplified impact. Below are recommendations to improve and update states’ accountability models and data systems.

2a. Create multiple measures of student success.

High-quality CTE programs are designed to help students achieve many outcomes. At the secondary level, they help young people obtain early college credit, earn an industry credential, enter work-based learning programs, graduate high school, and support postsecondary placement and transition beyond high school. They also help students succeed in content areas like mathematics, reading/language arts, and science. While not required by the law, **we recommend that each state include in its Perkins V state plan multiple measures of CTE program quality at the secondary level—ideally *all three of the statutory program quality measures* as described below—to capture the full range of student outcomes that CTE programs are designed to prepare students to meet.**

Per section 113 (b)(2)(A)(iv)(I) of Perkins V, each state must include at least one of the following program quality measures for secondary CTE programs: [5S1: Recognized Postsecondary Credential](#); [5S2: Attained Postsecondary Credits](#); and/or [5S3: Participated in Work-Based Learning](#).¹³ In FY 2020, thirty-seven (37) states selected one statutory program quality measure, ten (10) states selected two statutory program quality measures, and three (3) states (DE, IN, WA) selected all three statutory program quality measures. Twelve (12) states also developed another program quality measure of student success, such as postsecondary readiness, which is allowable under the statute, see [5S4, 5S5, 5S6: Program Quality – Other](#).¹⁴ Although the law is structured such that a state only needs to select one statutory program quality measure, most states have policies and priorities that support all three statutory program quality measures as core components of a high-quality CTE program.

The expansion to include all three CTE program quality measures can work in concert to support each state’s vision and goals and to give state policymakers a more comprehensive overview of the performance of local programs and the extent to which they are advancing student achievement and state goals. The data are also essential to support student equity, improve the quality of CTE programs, conduct research to improve policy and practice, and ensure that federal and state investments provide

a high return on investment.

State Example: Indiana

Indiana is one of three states that currently reports on all three secondary program quality indicators. In addition to reporting on all three, they also report on the number of students who attain postsecondary credits. They do this by using as the numerator definition the unduplicated number of CTE concentrators in the reporting cohort who earned at least nine (9) postsecondary credits in courses that map toward a postsecondary certificate or degree program.

2b. Align high school accountability models.

Similar to Perkins V, ESEA requires each state and local educational agency (LEA) to collect and report student outcome data. Together Perkins V and ESEA can provide a holistic picture of what students are experiencing in high school. For example, in many states, the majority of high school students enroll in CTE programs and coursework,¹⁵ yet for many the measurement of CTE programs under Perkins V remains separate from the state’s measurement of “college and career readiness” that it established under ESEA (for those states that have identified such School Quality and Student Success indicators in their ESEA consolidated state plans).¹⁶ **We recommend that each state review its ESEA and Perkins V accountability models to align the definitions, indicators, and data collection procedures that are necessary to implement both statutes.**

While not required, many states elected to establish a measurement of “college and career readiness” as a School Quality or Student Success indicator under ESEA as part of the state’s accountability system for high schools. This often includes the measurement of students in advanced coursework, dual and concurrent enrollment coursework, student attainment of industry-recognized credentials, and student participation in work-based learning programs, which can be the same as the Perkins V program quality measures described in Section 2a. A state can also use its measures of “college and career readiness” in ESEA to create another program quality measure of student success under Perkins V (e.g., [Program Quality – Other](#)). Other student outcome measures in ESEA and Perkins V, like academic achievement in mathematics, reading/language arts, and science, and high school graduation rates are identical.

Student outcome measures in Perkins V and ESEA are also very similar to WIOA performance indicators and measures for youth. This includes (see appendix for detailed breakdown):

- WIOA Title I Youth Education and Employment Rates (both 2nd and 4th quarter after exit),¹⁷ which are similar to the 3S1: Post-program Placement¹⁸ metric in Perkins V;
- WIOA Credential Attainment Rate,¹⁹ which is similar to [5S1: Recognized Postsecondary Credential](#)²⁰ in Perkins V and could include 1S1: Four-Year Graduation Rate²¹ in Perkins V and ESEA; and
- WIOA Measurable Skills Gain ²²which is similar to 1S1: Four-Year Graduation Rate, 2S1: Academic Proficiency in Reading/Language Arts, 2S2: Academic Proficiency in Mathematics, 2S3: Academic Proficiency in Science²³ in Perkins and ESEA as well as [5S1: Recognized Postsecondary](#)

[Credential, 5S2: Attained Postsecondary Credits](#), and [5S3: Participated in Work-Based Learning](#) in Perkins V.

The data that are reported through both ESEA and Perkins V are necessary to support and improve high schools across our country. States should align and integrate the accountability systems for the two laws to the extent possible to reduce burden on the state and LEAs and to communicate to LEAs clear and/or complementary goals for improving schools and the outcomes of their students. Using one set of indicators to measure college and career readiness for ESEA and secondary program quality for Perkins V is an important way a state can promote the alignment and integration that is needed. Similarly, using similar measures across Perkins V, ESEA, and WIOA is an important way to support collaboration and alignment across schools and state, local, and/or Tribal workforce development boards.

State Examples: Tennessee and Alabama

- *Tennessee* created the “[Ready Graduate Indicator](#)” which is a Perkins V (“other” program quality indicator) and ESEA School Quality or Student Success indicator that calculates the percentage of students who meet at least one of the following four Ready Graduate criteria (students can only be “counted” once): 1. Score of 21 or higher on ACT (or 1060 or higher on the SAT); 2. Complete 4 Early Postsecondary Opportunity (EPSOs)-aligned exams; 3. Complete 2 EPSOs and earn an industry credential; 4. Complete 2 EPSOs and earn a score of military readiness on ASVAB AFQT.
- *Alabama* established the Governor’s Office of Education and Workforce Transformation to braid education and workforce funding through modifications to the state’s ESEA, Perkins V, and WIOA state plans to support the *Alabama* Career Pathways Model. As an example, in 2022, ED approved [amendments to Alabama’s ESEA state plan](#) to include new indicators of college and career readiness to support CTE programs and in-school youth apprenticeship.

2c. Make CTE data publicly accessible.

Perkins V requires that student data be collected at the local and state level, and that data be made publicly available to support CTE program coordination. Section 113(b)(3)(D) of Perkins V requires that each state disseminate the actual levels of performance for all CTE concentrators and subgroups of students at the end of each program year. **We recommend a state require eligible recipients at the secondary and postsecondary levels publish and update student outcome data, including disaggregated student data by race, ethnicity, gender, and special populations, and share these data publicly, as appropriate, in formats that are user-friendly and accessible to the public.**

The public availability of student CTE data can be used to support eligible recipients to engage stakeholders, develop partnerships that support student equity and strengthen outcomes, and coordinate and provide wrap-around services to students. These data can also be used to support a state’s vision and goals and ways in which programs or services offered by community-based organizations, employers, and other core stakeholders can work together to improve student outcomes and the quality of CTE programs.

Each state should review and update its expectations in its Perkins V state plan for eligible recipients to report student data publicly, ensuring appropriate protection of student information in accordance with state and federal student data privacy laws. States should focus on creating the conditions that empower local leaders to use information to engage the community and their employer networks to support students. This practice can also support local leaders to tie Perkins V data into their public facing goals with their school boards or trustees and use this data to impact how federal, state, and local funds are used to support CTE programs, the types of CTE programs that are offered, and the quality of CTE programs.

State Examples: Maryland and North Carolina

- *Maryland* has [public data dashboards](#) that provide information on CTE student enrollment and performance, gaps and disparities in student performance by race, gender, and special populations categories, and alignment of CTE programs to the labor market.
- The *North Carolina* Community College System has a [website](#) that displays aggregate and disaggregated data for the state and each community college on student participation in postsecondary CTE and their outcomes on the Perkins V core indicators of performance.
- States can also review comparable presentations of student data at the federal level, such as [College Scorecard](#) and [TrainingProviderResults.gov](#).

3. Program Quality and Alignment

Today, most good jobs require some form of career-connected education and training. The Georgetown University Center on Education and the Workforce (Georgetown CEW) estimates that a postsecondary credential is now required to access 80 percent of what it describes as “good jobs”—or those jobs paying a minimum of \$35,000 for workers between the ages of 25 and 44 and at least \$45,000 for workers between the ages of 45 and 64. Moreover, many “good jobs” that the Georgetown CEW identified as accessible to individuals with a high school credential also require some form of postsecondary education or technical training that is beyond what is often available in high school. For example, carpentry and solar photovoltaic installer jobs typically require formal on-the-job training.²⁴

Over the next several years, the federal government and the private sector will be making exceptional, once-in-a-generation investments in critical sectors of our economy such as infrastructure, clean energy, semiconductors, and biotechnology through the--

- Bipartisan Infrastructure Law (BIL) which allocates \$1.2 trillion through distinct programs focused on infrastructure, transportation, climate and the environment, and broadband.
- CHIPS and Science Act (CHIPS) which allocates roughly \$280 billion to bolster semiconductor capacity and support research and development, high-tech hubs, and an inclusive STEM workforce.
- Inflation Reduction Act (IRA) which allocates \$370 billion to support clean energy, climate mitigation and resilience, agriculture, and conservation-related investment programs.²⁵

The strategic use of Perkins V can position your state to take full advantage of these opportunities by supporting the development and expansion of high-quality CTE programs to prepare youth and adults for the good jobs that will be created. To achieve this, each state's CTE programs need to be designed to intentionally link secondary and postsecondary education, create stackable credential and connected degree models, and include the appropriate guardrails to support student success. Below are recommendations to improve and update a state's program quality and alignment.

3a. Use statutory authority to improve program quality.

Perkins V gives each state, through its state plan, the responsibility to establish the criteria CTE programs must meet to qualify for Perkins V funding and establish policy to create the necessary guardrails to ensure that CTE programs support student success. These policy decisions often inform how CTE programs and programs of study are developed across secondary and postsecondary education systems, across institutions of higher education bridging workforce and degree programs, and across Perkins V consortia. **We recommend that each state use this statutory authority to create CTE “programs of study” that expand access to high-quality education and training and use “size, scope, and quality” to create policy conditions that improve student success.**

Through the Perkins V state plan, states have several levers to create and ensure high-quality CTE programs. Specifically, each state establishes criteria for creating and approving state and local CTE programs and programs of study, which is defined by Section 3(41) of Perkins V.²⁶ A state can use this authority to identify in its state plan the types of education and training programs that are eligible for Perkins V funding, which can include registered apprenticeship programs, described in [prior guidance](#). States can also require that CTE programs align across the P-12 and postsecondary education systems and be developed as part of a career pathway to be eligible for funding under Perkins V. Each state also has approval authority under Section 122(d)(4)(B) to create, “the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address state workforce development and education needs...”. States can use this authority to create, within their state plan, approval processes that have sufficient rigor to establish and enforce quality and student success. States can also use this policy to eliminate programs that do not meet these criteria.

At the local level, Perkins V funds must be used to support CTE programs that “are of sufficient size, scope, and quality to be effective,” per section 135(b). The following illustrates how states can ensure local programs meet the statutory requirement by defining:

- **“Size”** to specify numeric characteristics that are deemed necessary to implement the CTE program and program of study, such as the minimum number of CTE programs or programs of study that must be offered in a school or local education agency to be effective, minimum student enrollment in those programs inclusive of all sub populations, the number of credits or clock hours or competency model to document student learning, and other numeric aspects of the CTE programs implementation. These numeric aspects could include student-teacher ratio for classroom-based instruction or student-supervisor ratio for work-based learning programs, and may include the occupancy standard for a CTE classroom or instructional lab to maintain student safety.

- **“Scope”** to specify aspects of instructional design related to development and implementation of the CTE program and program of study, which includes the appropriate academic, technical, and employability skill standards that CTE programs and programs of study must include, expectations for employer engagement, expectations for the types of industry credentials of value, expectations for work-based learning programs, the alignment of secondary and postsecondary coursework within the CTE program which includes expectations for dual or concurrent enrollment and/or alignment to registered apprenticeship, and to ensure that CTE programs and programs of study are designed with multiple entry and exit points for students to transition into the workforce and higher levels of education.
- **“Quality”** to specify the types of student outcomes and support services that are necessary to ensure student access and success within the CTE program and program of study. This includes the expectation that CTE programs and programs of study are designed to prepare students to meet the core indicators of performance in [Section 113 of the statute](#) and are kept up-to-date based on data from the bi-annual comprehensive local needs assessment (CLNA); include student supports like postsecondary and career counseling and multi-tiered systems of support that create additional guardrails at the program and institutional level to support educational equity and student enrollment, matriculation, and completion; and meet other placement characteristics such as wage data and the types of occupations and industries that students pursue.
 - Institutional support for students can be further reinforced by states through the authority under Section 134(a) of Perkins V, which requires an eligible subrecipient to submit an application for Perkins V funds that has been approved by the state, and Section 134(b) which specifies the nine elements that must be part of states’ application for funds but gives states broad discretion to establish additional requirements that it deems appropriate.

State Examples: Alaska and West Virginia

- *Alaska* includes guardrails for non-credit programs in its postsecondary size definition. *Alaska’s* scope definition has multiple well-developed criteria including a requirement that postsecondary programs culminate in a postsecondary credential. *Alaska’s* quality definition requires that CTE programs align to “high-skill, high-wage, and in-demand” occupations.
- *West Virginia’s* definition of “quality” includes, but is not limited to, requiring that schools offering CTE achieve a minimum 70% overall rating on the state CTE Data Profile. CTE schools and programs must actively engage local business and industry sectors and postsecondary partners in institutional and programmatic advisory councils. Dual credit, Earn a Degree - Graduate Early (EDGE), and other advanced credit opportunities exist in all applicable programs of study and career pathways. Programs must meet two of the following three criteria: (1) The program of study leads to (a) high-skilled credential, (b) the program is in a high-wage career, and (c) individuals receive credentials for an in-demand occupation

3b. Ensure CTE programs are designed to *Unlock Career Success* for all students.

[Raise the Bar: Unlocking Career Success](#) is an interagency initiative that reimagines how our nation’s high schools prepare all students to thrive in their future careers. The initiative blurs the lines between

high school, college, and career, to provide students with accelerated and innovative opportunities to earn college credits and gain real-world career experiences in high school. Through the initiative, the Administration seeks to use CTE as a core driver of high school transformation and increase the number of high school students who accomplish the following four (4) keys--

1. Receive personalized career advising and navigation that is informed by labor market data, shapes plans for next steps, and empowers students and their families to make choices about their futures;
2. Engage in paid work-based learning in which students solve real-world problems, hone their skills, build networks of social capital, and gain experience in the workplace;
3. Receive their first industry credential(s) that demonstrates that they have the competencies and skills that employers are seeking; and
4. Earn at least 12 college credits, including academic and career-connected courses through dual or concurrent enrollment opportunities.

The four keys to [Raise the Bar: Unlocking Career Success](#) are often present in high-quality CTE programs and can be further supported through Perkins V state plans and related policies. CTE programs and programs of study are essential to provide students with career-connected learning experiences that sharpen their skills, build their networks, and help them define their future selves.

We recommend that states use given statutory authority under Perkins V to create criteria and requirements for CTE programs to equip students with the four (4) keys that they need to drive their future. This can include the development of state CTE programs and programs of study that embed the four (4) keys using the states' authority in section 122(d)(5)(A) to create CTE programs and programs of study. States may also require locally developed CTE programs and programs of study to include the four keys using states' authority in Section 124(b)(2) to approve CTE programs and programs of study. States may also ask eligible recipients who apply for Perkins funds to describe how dual enrollment, work-based learning, industry credentials, and career navigation are embedded within CTE programs using their authority in Section 135(b) to ensure that funds made available to eligible recipients are used to support CTE programs that are of sufficient "size, scope, and quality."

State Examples: Idaho and New York

- *Idaho* uses the authority under section 135(b) to require 3 of the 4 keys through its definition of scope. Secondary programs must include at least one articulation agreement or opportunity to earn college credits under Idaho's Advanced Opportunities program, the ability for students to earn a recognized postsecondary credential, and participate in WBL.
- *New York* uses its authority under section 124(b)(2) to require 3 of the 4 keys as elements required by the state's program approval process. Secondary programs must include the opportunity to earn college credit or advanced standing while still in high school via an articulation agreement with a postsecondary entity offering certification, apprenticeship, or college degree programs in a technical content area, work-based learning opportunities, and preparation for industry-based assessments or certifications.

3c. Support student equity.

Student equity is a core tenant of Perkins V. The national CTE program data that were submitted in FY 2021 and FY 2022 show stark disparities in student outcomes and differences in the educational opportunities that are afforded to students based on their gender, race, ethnicity, and by special population status. For example, during the 2020-21 school year, 66.25 percent of all CTE concentrators at the secondary level transitioned to postsecondary education or employment after high school ([Perkins V indicator 3S1](#)), but only 37.18 percent of CTE concentrators with disabilities and 18.66 percent of CTE concentrators who are English learners successfully transitioned to postsecondary education or employment.²⁷

These data are critical for states as they create and expand policies to improve CTE program quality (as described above), improve and link state accountability models (also described above), and to identify funds that can be used to support closing equity gaps and increasing wrap-around services for students (described below). **As states reexamine and update their goals, strategies, accountability model, financial supports, and other actions, they should use student outcome data to make changes to these systems to support student equity and the special populations defined in Perkins V.**

States should update their Perkins V plans to include strategies and student supports that they have found to be the most effective at engaging and supporting students and in addressing equity gaps. For example, we know that transition and student support services are paramount to students thriving beyond high school and in higher education. States should prioritize the alignment of federal programs, including programs that support learners from low-income backgrounds—like the alignment of Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) within community and technical colleges, and those supporting individuals with disabilities, like pre-employment transition models—to address students’ basic needs and promote economic stability for learners that are often left out of economic growth and opportunity. For example, many community and technical colleges use student Federal Application for Student Aid (FAFSA®) data to administer federal programs as described [here](#).

States should include support for local communities and educators to address the mental health needs of students. Mental health affects the well-being of every student, educator, school, and community in America. A February 2023 [CDC report](#) underscores the critical need for schools to expand school-based services and to connect youth and families to community-based sources of care. Schools could expand their strategies using funds provided by the Bipartisan Safer Communities Act (BSCA), and implement recommendations to increase access to services through the [Medicaid and school based services guide](#).

As they consider a new Perkins V state plan or amendments, states should consider how they support modularized, innovative, and personalized services—which can create a more nimble learning environment for students. This could include plans for better leveraging technology, as described in the [National Education Technology Plan](#) and [Advancing Digital Equity for All](#), for synchronous and

asynchronous program delivery, including work-based learning, and providing greater flexibility and adaptability for students as they are balancing competing commitments and schedule challenges.

4. Formula, Leadership, and Reserve Funds

A state's ability to strategically blend, braid, and connect federal and state investments in its education and workforce systems is essential to fully achieve its vision and goals. The Perkins V state plan provides several opportunities for states to strategically leverage formula, leadership, and reserve funds to support its vision, create incentives to support its goals, and apply federal resources to support innovation, develop partnerships, and address inequities for learners.

Perkins V formula funds are issued to secondary and postsecondary eligible recipients by statutory formula, per Section 131(a) and Section 132(a), respectively, but states have some discretion in how these formulas are developed and may offer alternatives that are more equitable based on the needs of a state and its learners. Each state also has the option, per Section 112(c), to develop a "reserve fund" to foster innovation and promote labor market alignment. Additionally, each state has the discretion to apply "state leadership funds" that are authorized by the statute to support system innovation and responsiveness as well as through the required state set-asides per Section 112(a)(2). Per the statute, state set-asides include the amount each state allocates in providing financial support for correctional institutions and juvenile justice facilities, institutions that serve individuals with disabilities, as well as the types of activities that the state supports to increase student equity through non-traditional training and employment, and special populations recruitment. Each state should review the amounts and uses of its formula, reserve, and leadership funds under Perkins V. Below are considerations for how to do so.

4a. Consider an alternative postsecondary funding formula.

Per Section 132(b), each state has the flexibility to either adopt the postsecondary funding formula that is defined in section 132(a) of Perkins V, which distributes funds to eligible postsecondary institutions based on the percentage of students receiving Pell Grants and recipients of assistance from the Bureau of Indian Affairs enrolled in CTE programs at such institutions, or states may develop an alternate postsecondary funding formula that is more equitable. Should a state desire to develop an alternate postsecondary funding formula, the state must submit a waiver application to the Secretary that demonstrates that the statutory postsecondary formula "does not result in a distribution of funds to the eligible institutions or consortia within the state that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution," as cited in Section 132(b)(1) of Perkins. **We recommend that each state review how postsecondary formula funds are distributed and ensure that the methodology the state chooses to support is the most equitable based on the needs of students and how the state's postsecondary CTE system functions.**

To date, nine (9) states have created an alternate postsecondary funding formula that includes Pell *and* additional measures of student poverty such as SNAP, TANF, Medicaid, and other public benefit programs. Some states also include student enrollment in specific census tracts that have high concentrations of poverty, which is often done in WIOA core programs.²⁸ Most often, states with an

approved alternate postsecondary funding formula are seeking to ensure that Perkins funds are distributed to eligible postsecondary recipients that enroll the highest percentages of economically disadvantaged learners and these decisions are based on how states' postsecondary CTE systems function. For example, FAFSA completion in many states is often lower at community and technical colleges than in predominantly four-year institutions²⁹; and states may choose to allow Perkins funds to support industry credential programs that are not Pell-eligible—thus, an expanded definition of economically disadvantaged learners may be necessary to create a more predictable and equitable postsecondary funding formula.

An alternative formula that includes receipt of public benefits like TANF and SNAP may also create an incentive to postsecondary institutions to connect their students with public benefit programs and agencies to better address students' basic needs. Specifically, an eligible postsecondary recipient that increases the proportion of CTE students who meet the alternate measures of economic disadvantage may see an increase in the amount of Perkins V funds that the institution receives in the next fiscal year. To further support institutions through their Perkins V state plans, states can also include policy guardrails that support the co-enrollment of students in these services, which can help to facilitate data sharing agreements between state agencies and joint service management agreements across public benefit providers and institutions of higher education.

State Examples: California and Delaware

- *California* proposed an alternative formula that enables the state to more equitably recognize and serve economically disadvantaged CTE participants in courses conducted by adult schools and Regional Occupational Centers (ROCPs), as well as those enrolled in the community colleges. The elements that are included in this alternative formula are:
 - Pell Grants; Promise grants; CalWORKs; WIOA; Supplemental Security Income; General/Public Assistance; Eligibility for economic public assistance or student aid; Annual income level below poverty level as determined by county of resident; Self-declaration by adults.
- *Delaware* proposed an alternative postsecondary formula that will result in a distribution of funds to those eligible institutions or consortia within the state that have the highest numbers of economically disadvantaged individuals. The elements that are included in this alternative formula are:
 - Federal Pell Grant recipients; Federal Supplemental Nutrition Assistance Program (SNAP) recipients; Federal Temporary Assistance for Needy Families (TANF) recipients; Federal Medicaid recipients; and Delaware Promise Communities residents. Delaware's Promise Communities are those geographic areas, designed under Federal WIOA Title I guidance, using factfinder.census.gov, that have high concentrations of low-income families and high poverty.

4b. Leverage state leadership and reserve funds.

Perkins V gives each state the opportunity to target up to 22.75 percent of its Perkins V grant award to promote innovation and address state priorities and goals. A state may reserve 10 percent of its total allocation for state leadership activities and use 15 percent of the 85 percent of funds available for distribution to eligible recipients (or 12.75 percent of the total allocation) for the reserve fund. **We recommend that each state fully leverage state leadership funds and the reserve fund to support student equity, spur innovation, and improve state and local CTE programs and ecosystems.**

Under Section 112(a)(2) of Perkins V, a state may use up to 10 percent of its Perkins V grant award to carry out state leadership activities to improve CTE within a state. Each state has discretion in how it uses state leadership funds, but it must use some of the funds for preparing students for non-traditional fields (not less than \$60,000 and not more than \$150,000); serving individuals in state institutions (up to an amount equal to 2 percent of the state's allocation); recruiting, preparing, or retaining CTE teachers and faculty; and providing technical assistance for eligible recipients. It also must use a portion of the funds to report on the effectiveness of its state leadership investments in achieving state goals, state determined performance levels, and addressing equity gaps in student outcomes. Once a state has used state leadership funds for the required uses of funds, it may use the remainder for a wide range of activities.³⁰ During the most recent program year, four (4) states did not use the full 10 percent available to them for state leadership activities.

State leadership funds can also be used in innovative ways to support agency coordination or as braided funds, such as with WIOA core partners, to create data-sharing agreements, like those that are needed to support student co-enrollment and wrap-around services. Funds can also be used to support innovation by supporting the implementation of the four (4) keys of [Raise the Bar: Unlocking Career Success](#). A state can also apply state leadership funds to address CTE workforce issues, like supporting the CTE teacher workforce or licensure requirements to aid in the transition of industry trained professionals into education, which is described in [prior guidance](#) on educator preparation.

On July 1, 2023, incarcerated and confined persons became eligible for Pell Grants. Your state correctional agency and some of the postsecondary institutions in your state are likely working now to develop and submit for Department approval [Prison Education Programs](#) for which Pell Grant funds may be used. Perkins V state leadership funds may be used to bolster these efforts by, for example, supporting the adaptation or development of curriculum, purchasing equipment, and preparing instructors. **We recommend that states leverage the full two (2) percent that may be reserved from state leadership funds for correctional institutions and juvenile justice facilities to develop new prison education programs.** At present only nine (9) states use the full two (2) percent.

Under Section 112(c) of Perkins V, states may reserve up to 15 percent of the Perkins V funds required to be distributed to eligible recipients by formula under sections 131 and 132 to award grants to certain eligible recipients through means other than the statutory formula (referred to as the reserve fund). These funds may be awarded to eligible recipients by the state competitively or through a state-devised formula to foster innovation through the identification and promotion of promising and proven CTE

programs, practices, and strategies, or to promote the development, implementation, and adoption of programs of study or career pathways aligned with state-identified high-skill, high-wage, or in-demand occupations or industries.

To date, 14 states allocate the full 15 percent available to support the reserve fund, 13 states allocate between 15 and 10 percent, 11 states allocate between 10 and 5 percent, eight (8) states allocate less than 5 percent, and seven (7) states do not implement a reserve fund under the statute. Reserve funds are most commonly used to spark innovation across a region, target growth in specific industry sectors or improve CTE program quality, address the demonstrated needs of learners, support technical assistance based on the state accountability model, or implement new ideas. The state reserve fund may also be used to support CTE programs to include the four (4) keys to [Unlocking Career Success](#) that is described in section 3b including support services for all students to access these programs or technology to support both access and innovation. These funds can support statewide or regional efforts, allowing states to address needs across an area, not just at a local level.

Additionally, reserve and state leadership funds could be strategically leveraged by a state to ensure that CTE programs and programs of study are aligned to the state's economic needs, including the states' industry sector strategy, and be leveraged to support [Investing In America](#) and the BIL, CHIPS, and IRA acts. Each state should review its financial model in Perkins V and ensure that these federal investments are generating the impact that the state would like to see.

State Examples: Colorado, Illinois, Idaho

- *Colorado* uses state leadership funds to make CTE performance data public and to assist eligible recipients to use data to inform decision making. Colorado also uses the reserve funds for its "Innovations in CTE" grant program, which awards funds to identify best practices for replication.
- *Illinois* allocates roughly \$377,000 in state leadership funds to the Illinois Department of Corrections (IDOC) to offer CTE courses in 25 state correctional facilities. Illinois also uses state leadership funds to support the Higher Education in Prison (HEP) Task Force which works with the state legislature to expand access to prison education programs.
- *Idaho* uses state leadership funds to support the Occupational Certified New Teacher Training program to support individuals who switch careers to become CTE teachers. The program includes a pre-service academy, coursework to support teaching and learning pedagogy, and mentorship during the entire period of initial certification.

Conclusion

Next year will present you with a powerful opportunity to influence how federal education and workforce dollars will be invested in your state for years to come. I hope you will take advantage of the policy tools outlined in this letter to strengthen the contributions your state's CTE programs can make to supporting economic growth and promoting economic mobility in your state.

The Office of Career, Technical, and Adult Education is available to support you in your planning efforts. Please contact your Perkins Regional Coordinator if you have any questions regarding the submission requirements and procedures for your state's FY 2024 Perkins V grant award. A state-by-state listing of these staff members is available at <https://cte.ed.gov/contact/staff-by-state-responsibility>.

Sincerely yours,

/s/

Amy Loyd, Ed.L.D.
Assistant Secretary for Career, Technical,
and Adult Education

Legal Requirements

Other than statutory and regulatory requirements referenced in the document, the contents of this letter do not have the force or effect of law and do not bind the public and school communities. This document is intended only to provide clarity regarding existing requirements under the law or agency policies.

Legal Disclaimer

For the reader's convenience, this document contains examples of strategies and policies used by states. Inclusion of such information does not constitute an endorsement by the Department or the federal government, nor does it indicate a preference or support for these examples as compared with others that might be available and be presented.

Appendix

Comparison of Perkins V and WIOA Title I Youth Performance Indicators

Perkins V	WIOA Title I Youth
<p><u>Four-Year Graduation Rate (1S1)</u>: The percentage of CTE concentrators who graduate high school, as measured by the four-year adjusted cohort graduation rate defined in section 8101 of ESEA.</p> <p><u>Extended-Year Graduation Rate (1S2)</u>: At the state’s discretion, the percentage of CTE concentrators who graduate high school, as measured by extended-year adjusted cohort graduation rate defined in section 8101 of the ESEA.</p> <p><u>Program Quality – Attained Recognized Postsecondary Credential (5S1)</u>: The percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.</p>	<p><u>Credential Attainment</u>: The percentage of those participants enrolled in an education or training program (excluding those in OJT and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.</p> <p><u>Note</u>: A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant also is employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.</p>
<p><u>Academic Proficiency in Reading/Language Arts (2S1)</u>: CTE concentrator proficiency in the challenging state academic standards adopted by the state under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act.</p> <p><u>Academic Proficiency in Mathematics (2S2)</u>: CTE concentrator proficiency in the challenging state academic standards adopted by the state under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in mathematics as described in section 1111(b)(2) of such Act.</p>	<p><u>Measurable Skill Gains</u>: The percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.</p>

Perkins V	WIOA Title I Youth
<p><u>Academic Proficiency in Science (2S3)</u>: CTE concentrator proficiency in the challenging state academic standards adopted by the state under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in science as described in section 1111(b)(2) of such Act.</p> <p><u>Program Quality – Attained Postsecondary Credits (5S2)</u>: The percentage of CTE concentrators graduating from high school having attained postsecondary credits in the relevant career and technical education program or program of study earned through a dual or concurrent enrollment or another credit transfer agreement.</p>	
<p><u>Post-Program Placement (3S1)</u>: The percentage of CTE concentrators 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.</p>	<p><u>Title I Youth Education and Employment Rate – 2nd Quarter After Exit</u>: The percentage of program participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the program.</p> <p><u>Title I Youth Education and Employment Rate – Fourth Quarter After Exit</u>: The percentage of program participants who are in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the program.</p>
<p><u>Program Quality – Participated in Work-Based Learning (5S3)</u>: The percentage of CTE concentrators graduating from high school having participated in work-based learning.</p>	<p>No comparable performance indicator.</p>

Perkins V	WIOA Title I Youth
No comparable performance indicator.	<u>Median Earnings – 2nd Quarter After Exit</u> : The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program, as established through direct unemployment insurance wage Record match, Federal or military employment records, or supplemental wage information.

¹ For the purpose of this memo, the 50 States, the District of Columbia, Puerto Rico, Guam, American Samoa, Commonwealth of Northern Mariana Islands, and Palau are collectively referred to as "states."

² National Governors Association (2023), *Governors Tout Bold Investments in Workforce Development During 2023 State of The State Addresses* (March 20, 2023). Retrieved from: <https://www.nga.org/news/commentary/governors-tout-bold-investments-in-workforce-development-during-2023-state-of-the-state-addresses/>.

³ Perkins V requires states to consult with a broad range of stakeholders and provide an opportunity for public comment both in developing a state plan and in establishing state-determined performance levels for submission to the U.S. Department of Education. The consultation and public comment requirements for the development of state plans are in sections 122(a)(3) and (4) and 122(c)(1)(A) of Perkins V. The consultation and public comment requirements with respect to state determined performance levels are described in section 113 (b)(3)(B) of Perkins V.

⁴ For example, Perkins V section 122(d)(4)(C)(iii) requires the eligible agency to describe in its state plan how it will "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."

⁵ WIOA Section 102(b)(1)(B) and *Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements* (OMB control # 1205-0522), section II(a)(1)(B).

⁶ For example, one of the purposes for which states may award reserve funds is "to promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, high-wage, or in-demand occupations or industries." See section 112(c)(2)(B) of Perkins V.

⁷ The Perkins V state plan must be submitted by an "eligible agency," which is defined by Perkins V as a "State board designated or created consistent with State law as the sole State agency responsible for the administration of career and technical education in the State or for the supervision of the administration of career and technical education in the State." See sections 122(a)(1) and 3(18) of Perkins V. The eligible agency submitting the state plan must give the governor 30 days to sign the state plan. If the governor does not sign the plan within that 30-day period, the eligible agency submits the plan to the U.S. Department of Education without that signature. See section 122(e)(3) of Perkins V.

⁸ Braiding funds means coordinating two or more funding sources to support the total cost of a service or activity while separately tracking and reporting on each source of funding. Cost-allocation methods are required to ensure that each funding source is charged its fair share. See Urban Institute (2022), *Local Workforce System Guide*. Retrieved from: <https://workforce.urban.org/node/57.html>.

⁹ Section 3 (24) of WIOA defines "individual with a barrier to employment" as a "member of one or more of the following populations: (A) Displaced homemakers. (B) Low-income individuals. (C) Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166 [of WIOA]. (D) Individuals with disabilities, including youth who are individuals with disabilities. (E) Older individuals. (F) Ex-offenders. (G) Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))). (H) Youth who are in or have aged out of the foster care system. (I) Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers. (J)

Eligible migrant and seasonal farmworkers, as defined in section 167(i). (K) Individuals within 2 years of exhausting lifetime eligibility under part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.). (L) Single parents (including single pregnant women). (M) Long-term unemployed individuals. (N) Such other groups as the Governor involved determines to have barriers to employment.”

¹⁰ Section 3(48) of Perkins V defines “special populations” to mean: “(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 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.”

¹¹ Ibid.

¹² Section 3(12) of Perkins V defines “CTE concentrator” to mean: “(A) at the secondary school level, a student served by an eligible recipient who has completed at least 2 courses in a single career and technical education program or program of study; and (B) at the postsecondary level, a student enrolled in an eligible recipient who has—(i) earned at least 12 credits within a career and technical education program or program of study; or (ii) completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.”

¹³ These performance indicators are the percentage graduating from high school having attained a recognized postsecondary credential (5S1); attained postsecondary credits in the relevant career and technical education program or program of study earned through a dual or concurrent enrollment or another credit transfer agreement (5S2); and participated in work-based learning (5S3).

¹⁴ Perkins V gives states the opportunity to establish additional indicators for “achieving on any other measure of student success in career and technical education that is statewide, valid, and reliable, and comparable across the State.”

¹⁵ U.S. Department of Education (2019), Bridging the Skills Gap: Career and Technical Education in High School. Retrieved from: <https://www2.ed.gov/datastory/cte/index.html>

¹⁶ Section 1111(c)(4)(B)(v) of ESEA requires states to identify for school accountability purposes one indicator of school quality or student success for each grade span that “allows for meaningful differentiation in school performance” and is “valid, reliable, comparable, and statewide.” They may include measures of “(III) student engagement; (IV) educator engagement; (V) student access to and completion of advanced coursework; (VI) postsecondary readiness; and (VII) school climate and safety; and (VII) any other indicator the State chooses that meets the requirements of this clause [section 1111(c)(4)(B)(v) of ESEA].”

¹⁷ There are two WIOA title I Youth performance indicators that pertain to the education and employment status of participants after exiting the program: (1) The percentage of title I Youth program participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the program; and (2) The percentage of title I Youth program participants who are in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the program. See U.S. Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter No. 10-16, Change 2. Retrieved from: <https://www.dol.gov/agencies/eta/advisories/tegl-10-16-change-2>

¹⁸ This Perkins V performance indicator is “the percentage of CTE concentrators 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.”

¹⁹ The WIOA title I credential attainment performance indicator is “the percentage of those participants enrolled in an education or training program (excluding those in on-the-job-training and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program. A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant also is employed or is enrolled in an education or

training program leading to a recognized postsecondary credential within one year after exit from the program.” Sec. 116(b)(2)(A)(i)(IV) of WIOA.

²⁰ This Perkins V performance indicator is “the percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.”

²¹ This Perkins V performance indicator is “the percentage of CTE concentrators who graduate high school, as measured by the four-year adjusted cohort graduation rate defined in section 8101 of ESEA.”

²² The WIOA title I measurable skill gains performance indicator is “the percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. Sec. 116(b)(2)(A)(i)(V) of WIOA.

²³ These Perkins V performance indicators are CTE concentrator proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of ESEA, as measured by the academic assessments in reading/language arts, mathematics, and science as described in section 1111(b)(2) of such Act.

²⁴ National Center for O*NET Development, (n.d.), O*NET OnLine. Retrieved from: <https://www.onetonline.org/>.

²⁵ The Invest.gov website has an interactive map that highlights the location of these and other investments in America for a given community, region, or State.

²⁶ “The term “program of study” is defined as a coordinated, nonduplicative sequence of academic and technical content at the secondary and postsecondary level that—(A) 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; (B) addresses both academic and technical knowledge and skills, including employability skills; (C) is aligned with the needs of industries in the economy of the State, region, Tribal community, or local area; (D) progresses in specificity (beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction); (E) has multiple entry and exit points that incorporate credentialing; and (F) culminates in the attainment of a recognized postsecondary credential.”

²⁷ National and state performance data for Perkins V can be found at:

<https://cte.ed.gov/pcrn/profile/national/performance/2021/map/1s1/met/all/all>

²⁸ Youth living in high poverty areas automatically meet the low-income criterion that is one of the eligibility criteria for in-school youth, for some out-of-school youth in the WIOA youth program, and for youth in the Indian and Native American Supplemental Youth Program. The WIOA regulations for the Title I Youth program at 20 CFR § 681.260 define high-poverty areas as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area (as defined by the U.S. Census Bureau), Alaska Native Village Statistical Area or Alaska Native Regional Corporation Area, Native Hawaiian Homeland Area, or other tribal land as defined by the Secretary of Labor in guidance or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey 5-Year data.

²⁹ McKinney, L., & Novak, H. (2015). FAFSA filing among first-year college students: Who files on time, who doesn't, and why does it matter? *Research in Higher Education*, 56, 1–28. Retrieved from:

<https://link.springer.com/article/10.1007/s11162-014-9340-0>

³⁰ See section 124(b) of Perkins V for a list of permissible uses of state leadership funds.