
Pennsylvania 4-Year State Plan

March 2020
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U. S. Department of Education
Office of Career, Technical, and Adult Education

Strengthening Career and Technical Education for the 21st Century
Act (Perkins V) State Plan

I. Cover Page

A. State Name: Pennsylvania

B. Eligible Agency (State Board) Submitting Plan on Behalf of State: Pennsylvania State Board for Career and Technical Education

C. State Agency delegated responsibilities by Eligible Agency under section 131(b) for the administration, operation, or supervision of activities of the State plan (if applicable):

Pennsylvania Department of Education

D. Individual serving as the State Director for Career and Technical Education:

☑ Check here if this individual is the same person identified in Item C above and then proceed to Item E below.

1. Name: ___________________ Lee Burket ____________________

2. Official Position Title: Director, Bureau of Career and Technical Education

3. Agency: __________________ Pennsylvania Department of Education

4. Telephone: (717) 783-6977 5. Email: lburket@pa.gov

E. Type of Perkins V State Plan Submission – FY 2019 (Check one):

☑ 1-Year Transition Plan (FY2019 only) – if an eligible agency selects this option, it will need only to further complete Items G and J.

☐ State Plan (FY 2019-23) – if an eligible agency selects this option, it will complete Items G, I, and J

F. Type of Perkins V State Plan Submission – Subsequent Years (Check one):¹

☑ State Plan (FY 2020-23)

☐ State Plan Revisions (Please indicate year of submission: ____________________)

G. Submitting Perkins V State Plan as Part of a Workforce Innovation and Opportunities Act (WIOA) Combined State Plan – FY 2019 (Check one):

__________________________

¹ Item F will only appear to the user in the Perkins V State Plan Portal in subsequent years (FY 2020-23).
H. Submitting Perkins V State Plan as Part of a Workforce Innovation and Opportunities Act (WIOA) Combined State Plan – Subsequent Years (Check one):  
☐ Yes  
☒ No

Yes (If yes, please indicate year of submission: 2020)

☐ No

I. Governor’s Signatory Authority of the Perkins V State Plan (Fill in text box and then check one box below):  

<table>
<thead>
<tr>
<th>Date Governor was sent State Plan for signature:</th>
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<tbody>
<tr>
<td>February 3, 2020</td>
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☒ The Governor has provided a letter that he or she is jointly signing the State plan for submission to the Department.

☐ The Governor has not provided a letter that he or she is jointly signing the State plan for submission to the Department.

J. By signing this document, the eligible entity, through its authorized representative, agrees:

1. To the assurances, certifications, and other forms enclosed in its State plan submission; and

2. That, to the best of my knowledge and belief, all information and data included in this State plan submission are true and correct.

<table>
<thead>
<tr>
<th>Authorized Representative Identified in Item C Above (Printed Name)</th>
<th>Telephone:</th>
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</thead>
<tbody>
<tr>
<td>Lee Burket</td>
<td>(717) 783-6977</td>
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<table>
<thead>
<tr>
<th>Signature of Authorized Representative</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lee Burket</td>
<td>March 18, 2020</td>
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2 Item H will only appear to the user in the Perkins V State Plan Portal in subsequent years (FY 2020-23).
3 Item I is required in FY 2019 only for States that choose to submit a full Perkins V State plan, covering FY 2019-23.
II. Narrative Descriptions

A. Plan Development and Consultation

1. 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 Pennsylvania Department of Education (PDE) engaged local stakeholders in Pennsylvania’s career and technical education (CTE) community to gain their input regarding the 4-year state plan for Strengthening Career and Technical Education for the 21st Century Act of 2018 (Perkins V). The selection of the stakeholders began with the Department’s internal Perkins V Planning Committee (Committee) identifying the required stakeholders group and determining who could assist in identifying the members to invite. The Department identified 146 diverse stakeholders, as required under Section 122(C)(1)(A), to serve on this cross-sector planning committee.

Once the stakeholders were identified and contact information was obtained, PDE invited stakeholders to attend an initial convening on March 19, 2019 in State College, PA, to begin assisting the Department with developing the State Plan. The invitation and initial communications noted stakeholders’ role in determining how the state will implement the new regulations and use federal Perkins funds, as well as provided background on the Perkins law for context. A total of 77 individuals from across the state attended the initial Committee meeting on March 19. The agenda included numerous topics and sought feedback on all areas of the plan.

In addition to the initial Committee meeting, PDE held three stakeholder sessions across the state:

- April 9, 2019: Butler County Community College, Butler, PA
- April 10, 2019: Bucks County Community College, Newtown, PA
- April 11, 2019: Harrisburg Area Community College, Harrisburg, PA

Among the 255 individuals who attended the three sessions, 11 percent were business and community members, 24 percent were postsecondary education representatives, and 5 percent were education partners or agencies. Table 1 provides an overview of the attendees by type and location.
At each meeting, attendees were asked for feedback on policy decisions related to program accountability and defining meaningful progress. The stakeholders assisted in determining which program quality indicator to select, how flow-through funds should be allocated to Perkins recipients, and whether the state should reserve funds for subawards to eligible recipients in rural areas, areas with high percentages of CTE concentrators or participants, and areas with high numbers of CTE concentrators or participants.

In addition to the Committee meeting and statewide stakeholder sessions, stakeholders had an opportunity to review and submit comment to PDE on preliminary draft state determined performance levels (SDPLs) from November 22-December 6, 2019. Stakeholder Committee members also were invited to participate in a meeting on December 3, 2020 where PDE staff explained the process for establishing the baseline for each indicator and for establishing the SDPLs. PDE used the feedback from the December 3 meeting and the written comment period to develop and establish the SDPLs. The final draft proposed levels then were disseminated to the stakeholders for their review on December 17, 2019. As required under Perkins V, stakeholders had until December 27, 2019 to review the process and baseline and submit written comments regarding how the established levels of performance:

1. Meet the requirements of the law;

2. Support the improvement of performance for all CTE concentrators including each subgroup of students and special population; and

3. Support the needs of the local education and business community.

PDE gathered written public comments on the SDPLs and baselines for each indicator through a designated email account managed by the PDE Bureau of Career and Technical Education (BCTE). The email account link was posted on the Department’s website and provided to all stakeholders.

Written stakeholder comments and the Department’s response are found in Appendix E.

2. 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 Pennsylvania State Board for Career and Technical Education (State Board) is the eligible agency to submit the Perkins V state plan. The State Board is responsible for adult career and technical education, postsecondary career and technical education, and secondary career and technical education. The State Board is responsible for the planning and development of the Perkins V state plan. Consultation with a different state agency was not necessary.

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

In October 2019, Pennsylvania conducted regional hearings. The public and interested organizations and groups were invited to attend the hearings and present their views and make recommendations regarding the draft state plan. The hearings were held on October 15, 2019 at the Chester County Technical College High School in West Grove, PA; on October 16, 2019 at Harrisburg Area Community College in Harrisburg, PA; and on October 17, 2019 at Westmoreland County Community College in Youngwood, PA.

The Department carefully considered each comment and written statement provided at the hearings and used that feedback to inform the next draft of the Perkins V state plan. The Department summary of the recommendations made at the hearings are covered in the State Plan.

The Department posted the draft state plan on the Department’s website in an easily accessible, ADA-compliant form. The Department then used a variety of communication methods to notify the field and the public that the draft state plan was available for review (e.g., Pennsylvania Bulletin, email, website, Penn*Link email system, statewide distribution lists, etc.). The Department also announced the availability of the state plan at meetings of the State Board of Education, Commission for Agriculture Education Excellence, the Pennsylvania Workforce Development Board, and the Governor’s Keystone Workforce Development Command Center, and requested input from the attendees.

PDE accepted public comment on the proposed Perkins V State Plan from January 2-February 3, 2020 under the required 30-day comment period prescribed pursuant to Perkins V, sec. 122. Individuals also had the opportunity to provide public comment in person during the State Board meeting on January 8, 2020.

All public comments were considered and, where applicable, used to inform development of the Perkins V State Plan. The final revision of the draft Perkins V state plan incorporated public comments.
B. Program Administration and Implementation

1. State’s Vision for Education and Workforce Development

   a. 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.)

State-supported workforce development activities can be characterized broadly in two ways: 1) the activities cross various sectors of the economy and government, and 2) state efforts are targeted to the specific places and populations which most need and benefit from state support in order for Pennsylvania to have a thriving workforce. Career and Technical Education (CTE) exemplifies the cross-sector nature of workforce preparation, bringing together education and industry to ensure students are prepared for in-demand occupations. Other state agencies including PDE, the Pennsylvania Department of Labor and Industry (L&I), and the Pennsylvania Department of Human Services (DHS) contribute to programs that meet the needs of special populations in Pennsylvania, as will be described in more detail below.

The Pennsylvania Workforce Development Board (PAWDB) advises the Governor on building a strong workforce development system aligned with state education policies and economic development goals. The board is comprised of representatives of businesses as well as the leaders of state agencies who are highly engaged in workforce development activities, including PDE and L&I. Among its activities, the PAWDB supports CTE programs of study.

Career and technical education enables secondary, postsecondary, and adult students to pursue technical education, in conjunction with a comprehensive academic education, that prepares them for high-quality and high-priority occupations. In 2018-19, there were 140 schools and 84 career and technical centers (CTCs) offering 1,723 approved secondary CTE programs statewide, with over 67,000 secondary CTE students enrolled.

CTE is critical to workforce development because of the great number of students engaged, and because all PDE-approved CTE programs lead to industry-recognized credentials. Schools use the PDE Industry-Recognized Certifications for Career and Technical Education Programs Guide to identify industry-recognized credentials aligned to CTE programs in Pennsylvania’s career clusters. The list is reviewed annually; in 2018-19, PDE added 12 certifications. In the same year, CTE students earned 39,235 industry credentials.

Pennsylvania has a robust system of CTE Programs of Study. CTE Programs of Study are designed at the state level by PDE in collaboration with employers to
provide students with the recommended academic and technical courses needed for employment in an in-demand occupation within one of thirteen career clusters. PDE works with secondary instructors and postsecondary faculty, as well as business and industry representatives, to develop statewide technical task grids that must be taught as part of the Program of Study.

By developing statewide technical standards aligned to industry expectations, Pennsylvania’s Statewide Articulation Agreements (SOAR) allow qualified CTE students to receive postsecondary technical credit for coursework completed in high school. Since 2011, a total of 285 qualifying SOAR program graduates have been awarded 1,809 postsecondary credits. PDE has explored ways to expand students’ and institutions’ ability to take advantage of such articulation agreements in its plan for Perkins V, in order to decrease the cost of a postsecondary degree for CTE students, and enable them to enter the workforce more quickly, fully prepared for the economy’s in-demand occupations.

CTE also exemplifies how different workforce development activities combine to better serve special populations of Pennsylvanians. Collaboration among postsecondary career and technical education programs and adult basic education programs encourages students without a high school diploma or equivalent to enroll in eligible career pathway programs.

Other populations specifically served by Pennsylvania workforce development initiatives include community college students, low-income postsecondary students, rural students, and students with disabilities. The career-readiness needs of Pennsylvania residents with disabilities are addressed by the L&I Office of Vocational Rehabilitation. Students attending any of Pennsylvania’s 14 community colleges who are recipients of TANF or SNAP benefits can take advantage of holistic support to complete their academic program and obtain high-quality employment through a program offered by DHS called Keystone Education Yields Success (KEYS). A KEYS student facilitator assists eligible students with identifying career goals, scheduling courses, navigating financial aid, and meeting transportation and childcare needs.

The Pennsylvania Higher Education Assistance Agency (PHEAA) administers the PA-TIP program to provide need-based financial awards to students enrolling in certificate programs less than two years in length for high priority occupations (HPOs) in several industry sectors. PHEAA also has 14 Higher Education Access Partners strategically located throughout the commonwealth to provide postsecondary services to students, families, educators, schools, community partners, and the public. Services include free financial aid presentations and completion sessions, programs to assist students with planning and preparing for postsecondary education, and professional training for school counselors and advisors. The Pennsylvania College Advising Corps also places recent college
graduates as full-time advisors in underserved, rural high schools across Pennsylvania to increase matriculation rates of their students.

A targeted regional approach to workforce development in rural areas, where fewer postsecondary resources exist, is provided by Community Education Councils (CECs). These Councils provide program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential-bearing training opportunities. CECs serve as an intermediary and broker of training programs based on identified need and demand.

The cross-sector PAsmart workforce development initiative promotes the expansion of Registered Apprenticeships and invests in postsecondary education and training in computer science and STEM fields. The Next Generation Sector Partnership program, also supported at the local level through PAsmart state grants, encourages trainings that result in a postsecondary credential by requiring all proposals to identify credentials/certifications to be obtained and by making credentials a required outcome measure. These state-funded grant initiatives reach pre-Kindergarten through 12th grade students, postsecondary students, and adult learners, in addition to Pennsylvanians already in the workforce seeking to gain relevant skills for an in-demand career in which they can earn a family-sustaining wage.

Finally, PDE has developed a long-term strategy to make workforce preparation available and equitable statewide to the youngest generation of Pennsylvanians. All K-12 schools integrate the Academic Standards for Career Education and Work (CEW standards) into curriculum, addressing career awareness and preparation, career acquisition, career retention and advancement, and entrepreneurship. Pennsylvania is the first state to include a true K-12 Career Readiness Indicator as part of its federal accountability system under the Every Student Succeeds Act. The Career Standards Benchmark identifies career readiness activities aligned with the CEW standards in all public K-12 schools. This emphasis on career readiness expands younger students’ understanding of the career opportunities, and the relevant postsecondary education and training, available to them.

b. 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.)

Pennsylvania’s economic future depends on a strong, skilled workforce able to compete in today’s global economy. To remain economically competitive, Pennsylvania must inform its workforce development policies, strategies, and goals using current labor market information and an understanding of the future workforce needs of workers and employers. The commonwealth has a diversified economy with numerous competitive industry clusters and strives to develop a skilled workforce
that aligns worker career goals to employer needs and serves those with barriers to employment. The commonwealth’s capacity to provide an educated workforce is evidenced by approximately 375 postsecondary educational institutions which collectively enrolled more than 740,000 students in 2017-18. Pennsylvania is an ideal location for families and businesses given its mix of urban, suburban, and rural areas, its proximity to nearly one-half of the nation’s population, and strong job markets. While these characteristics of the commonwealth’s labor market contribute to its economic strength, they also create an opportunity to develop an increasingly skilled workforce to meet the demands of employers, the career goals of workers, and the needs of our evolving economy.

Pennsylvania’s goals for preparing an educated and skilled workforce are expressed in the sub-goals of its state WIOA plan:

- Expanding registered pre-apprenticeship and apprenticeship programs;
- Increasing efforts to recruit apprenticeship participants from non-traditional populations, such as women, persons with disabilities, and re-entrants;
- Building a career pathways system by increasing public awareness of the career pathways model and program design;
- Increasing exposure for K-12, postsecondary, and adult learners to career awareness and exploration activities;
- Expanding access to programs that lead to credentials or certifications, such as career and technical education, online education and training programs, dual enrollment programs, or apprenticeships;
- Collaborating across state agencies on career readiness activities, building partnerships across education and business and industry for both students and educators; and
- Identifying and promoting evidence-based models and effective practices for engaging opportunity youth.

To achieve its workforce readiness goals for all Pennsylvania residents, commonwealth leaders recognize that offering support services to special populations is not additional, but integral, to the plan. A priority of the governor and of commonwealth agencies, as outlined in Governor Wolf’s PAsmart Grants Framework: Principles and Funding Priorities, which was approved by the Pennsylvania Workforce Development Board in 2018, is “equity, diversity, and inclusion.” Commonwealth workforce development efforts therefore seek to increase access to postsecondary and career and technical education specifically for historically under-represented and under-served students. State-led workforce development initiatives are a combination of meeting needs that already exist, and addressing foreseeable needs proactively by transforming educational
systems and providing tailored supports to learners and workers. Information about workforce development efforts tailored to special populations is enumerated in greater detail above in the summary of State-supported workforce development activities.

Over the past four years, commonwealth agencies have engaged thousands of stakeholders across the commonwealth and worked with cross-sector partners from pre-K to postsecondary education, workforce development, and human services to improve career readiness for all students. There are now established structures that can continue to leverage the expertise and resources at the local, state, and federal levels for Pennsylvania's workforce development.

In 2017, Governor Wolf convened the Middle Class Task Force, comprised of leaders in education, workforce, and economic development systems. The outcomes of the Task Force’s report led directly to the development of the PAsmart initiative, which has invested $70 million in its first two years in education and training needed for careers in high-growth industries. PAsmart supports the creation of regional workforce development and education partnerships such as STEM Ecosystems, the training of educators in computer science skills so that students are prepared for a high-tech digital economy, the expansion of Registered Apprenticeships, and next-generation industry partnerships. The governor’s office also launched the PAsmart website to serve as a resource for commonwealth residents to identify the tools and resources they need to make education and career decisions.

The Task Force findings, and the governor’s commitment to the vision of “jobs that pay” and “government that works,” also led the governor to establish the Keystone Economic Development and Workforce Command Center. The Keystone Command Center is a group of state agency representatives from education, labor, industry, human services, and others, as well as representatives of labor and business. This cross-sector body elevates and seeks to align all workforce development efforts—whether the actions take place under the purview of education, labor and industry, economic development, or private industry partners—with the urgency that workforce issues demand in the current economic climate. The collaborative nature of the body facilitates the identification and elimination of barriers that confront residents of the state seeking to advance in their careers, as well as the barriers that face businesses and education and training institutions seeking to develop the workforce.

Collaboration between the PA Departments of Labor and Industry and Education has leveraged state workforce development policies and federal programs to initiate and grow self-sustaining local initiatives. L&I has partnered with Pennsylvania community colleges to apply for federal grants to increase access to post-secondary education for non-traditional, harder to serve individuals. Each of the community colleges is a Perkins postsecondary recipient and each is
expected to leverage investments to enhance access to career pathways. Additionally, in 2019, PDE and L&I each contributed federal funding to a state initiative called Teacher in the Workplace that drives greater work-based learning and career-ready skills development in schools (including CTCs), while fostering self-sustaining local and regional partnerships between educational institutions and businesses.

Building partnerships between the education and industry sectors has been and will continue to be a key state strategy because it provides a mechanism for ensuring that education meets the skilled workforce needs of employers. In career and technical education, there is already communication and collaboration with business and industry representatives, e.g. through the work of Occupational Advisory Committees, making career and technical education programs models for other educational systems in the commonwealth.

In an effort to achieve successful outcomes for Pennsylvania students, workers, businesses, and communities:

- The commonwealth has examined disaggregated data to identify how postsecondary access and affordability vary for different subsets of the population. It found that economically disadvantaged families and single parent households faced some of the highest barriers to accessing and completing a higher education credential, and as a result, committed $5 million in the Parent Pathways initiative to support low-income parents and families in pursuing higher education. The Parent Pathways model uses a multi-generational approach to provide wraparound services for parents pursuing a postsecondary credential. These supports may include case management, housing assistance, family programming, high-quality childcare, tutoring, help navigating the higher education landscape, and career counseling.

- Institutions that provide career and technical education have made concerted efforts to increase the representation of students in non-traditional programs. These efforts have seen encouraging results so far: the number of female students enrolled in non-traditional CTE programs (i.e., those traditionally enrolled in by male students) rose 5.7 percent over the four years from 2014-15 to 2018-19. The efforts of CTE institutions are mirrored and supported by the efforts of the Pennsylvania Department of Labor and Industry’s Apprenticeships and Training Office to increase the participation of underrepresented apprentices in nontraditional fields.

- The commonwealth has developed a first-of-its-kind program to help members of the state National Guard retrain and reenter the workforce. The Military Family Education Program, better known as the PA GI Bill, provides college benefits to active Pennsylvania National Guard Members. The PA GI Bill provides 10 semesters of tuition-free education to active members of the PA
National Guard and their family members. Pennsylvania’s commitment to serving National Guard members and their families exemplifies the broader statewide initiative to prepare the citizenry for an evolving workforce, while engaging adult learners and workers to actively drive Pennsylvania’s economy forward.

And finally, Pennsylvania is committed to improving coordination and alignment of education and workforce development programs, services, and funding.

- In 2015, the State Board of Education adopted the goal that 60 percent of Pennsylvania residents have a postsecondary credential by 2025.
- CTE drives the commonwealth toward this goal. The number of industry credentials earned by students enrolled in CTE programs increased 43 percent over the four-year period of 2014-15 to 2018-19.
- The Middle Class Task Force, which the governor convened in 2017 to break down silos among education, workforce, and economic development systems, the PAsmart initiative, launched in 2018 to implement the recommendations of the Task Force, and the Keystone Economic Development and Workforce Command Center, established in 2019 to carry on the work by specifically addressing barriers across the state and across sectors, all have contributed to increased collaboration and centralization of workforce development programs, services, and funding. These initiatives have been led by the governor and have been supported by labor and business leaders. They have given state agencies opportunities that did not exist before to explore how programs, services, and funding can be better coordinated to serve specific populations.

c. 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.)

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

Federal Perkins V complements current state-supported workforce development activities. Currently, the state has several workforce initiatives such as expansion of
pre-apprenticeship, apprenticeship, educator-in-the-workplace, and computer science course offerings.

The commonwealth has embraced state-local collaboration, cross-sector partnerships, and a focus on barrier remediation to achieve its vision of career pathways to self-supporting, family-sustaining careers. Pennsylvania recognizes the importance of postsecondary credentials as part of such pathways. In 2015, Governor Wolf established the goal that 60 percent of Pennsylvania residents have some form of postsecondary education by 2025, to meet industry demand for skilled workers. In 2016, Pennsylvania’s State Board of Education Council on Higher Education passed a Motion to Support this postsecondary attainment goal. To meet this goal, Pennsylvania has aimed to produce nearly 820,000 additional postsecondary credentials between 2017 and 2025. Pennsylvania employs many strategies to help more residents earn recognized postsecondary credentials, including the following:

Pennsylvania employs many strategies to help more students of all ages earn recognized postsecondary credentials, including the following:

- **Fostering early awareness of postsecondary opportunities:** K-12 schools in Pennsylvania integrate the Academic Standards for Career Education and Work (CEW standards) into curriculum, addressing career awareness and preparation, career acquisition, career retention and advancement, and entrepreneurship. Pennsylvania is the only state to include a true K-12 Career Readiness Indicator as part of its federal accountability system under the Every Student Succeeds Act. The Career Standards Benchmark identifies career readiness activities aligned with the CEW standards in all public K-12 schools. This emphasis on career readiness expands younger students’ understanding of the career opportunities, and the relevant postsecondary education and training, available to them.

- **Improving access to advanced coursework for all students:** PDE will work to expand the number of students enrolled in at least one advanced rigor course – including Advanced Placement (AP), International Baccalaureate, and dual enrollment courses – each year, and to identify opportunities to improve equitable access to such coursework. Governor Wolf established a goal to increase the number of AP tests given in high schools by 46 percent by 2020.

- **Leveraging networks and resources to guide postsecondary pathways:** Under Pennsylvania’s ESSA Consolidated State Plan, LEAs may use Title IV, Part A, and other federal funds, such as Title I, Part A and Title II, Part A, to support college and career exploration and advising, including hiring school counselors and other support staff to help all students, and especially underrepresented students, have the information and tools they need to gain awareness of college and career pathways and make informed decisions.
regarding their postsecondary future. Recognizing the critical role school counselors have on student success, PDE also partners with the Pennsylvania Higher Education Assistance Agency (PHEAA), public and private postsecondary institutions, and the Pennsylvania School Counselors Association to identify opportunities for K-12 school counselors to explore data and connect with resources on postsecondary access and success.

- **Improving awareness of college resources through regional partnerships:** The Pennsylvania Higher Education Assistance Agency (PHEAA) has 14 Higher Education Access Partners strategically located throughout the commonwealth to provide postsecondary services to students, families, educators, schools, community partners and the public. Services include free financial aid presentations and completion sessions, programs to assist students with planning and preparing for postsecondary education, and professional training for school counselors and advisors. The Pennsylvania College Advising Corps also places recent college graduates as fulltime advisors in underserved, rural high school schools across Pennsylvania to increase matriculation rates of their students.

- **Career and technical education as a path to industry-recognized credentials:** All PDE-approved career and technical education (CTE) programs lead to industry recognized credentials. Schools use the PDE Industry-Recognized Certifications for Career and Technical Education Programs Guide to identify industry-recognized credentials aligned to CTE programs in Pennsylvania’s career clusters.

- **Facilitating postsecondary credit transfer:** The Pennsylvania School Code was amended shortly in November 2019 to require all public institutions of higher education and all public school districts to provide the Pennsylvania Department of Education with the institutions’ articulation agreements for inclusion in an electronic database that is web accessible. The amendment also requires the posting of all agreements that award credit for an industry-recognized credential. The purpose of posting these agreements on the web-accessible electronic database is to increase transparency to students and allow them the ability to better plan their educational career. This will improve student’s movement among and between institutions and allow them to graduate more quickly by removing the need to re-take courses.

PDE also was a partner with the WIOA Combined State Plan writing. The Department including CTE staff were present at the weekly meetings to develop the WIOA state plan goals. There are five goals in the WIOA state plan. The goals are focused on (a) career pathways, (b) sector strategies and employer engagement, (c) youth, (d) continuous improvement of the workforce development system, and (e) strengthening the One-Stop Delivery system. Each goal aligns with Perkins V activities as well as other Department activities.
Specific Department CTE goals include:

a. Increase academic achievement of students enrolled in CTE;

b. Increase technical attainment of students enrolled in CTE;

c. Increase business engagement in CTE; and

d. Students enrolled in CTE have access to a minimum of one high value industry recognized postsecondary credential.

State Leadership funds support the development and offering of targeted technical assistance that is focused on improving the performance indicators associated with special populations, specifically nontraditional students. The technical assistance is designed for administrators with CTE programs and assists them in examining local data to determine gaps in performance of special populations’ categories.

Funds also support regional professional development workshops that support local efforts to attract and retain students in their non-traditional programs. This technical assistance is offered to those schools that receive sanctions letters related to their nontraditional performance indicator. The goal is to provide tools faculty and administrators can use to recruit and sustain to graduation students that are underrepresented in career and technical education programs in both secondary and postsecondary educational institutions.

The funds support individuals in state correctional institutions. Annually, 1 percent of the Perkins program allocation is provided to the state corrections facilities in order to serve youth in Pennsylvania’s detention and corrections facilities. The funds support instructional staff at two state correctional institutions (SCI) and Carbon-Lehigh Intermediate Unit (IU) #21. The SCIs and the IU provide career and technical education that leads to trade-based certifications in programs that offer employment opportunities in high demand occupations throughout Pennsylvania. Both provide occupational training, applied academics, employability training, and assessment with the goal of improving the youths’ chances of finding employment upon release. The grant recipients provide an annual report that outlines their accomplishments.

The State Leadership Funds also support the recruitment, preparation and retention of CTE teachers, faculty, specialized instructional support personnel and paraprofessionals. The Department has developed and implemented CTE teacher and administrator certification programs through contractual agreements with three state universities. Each university (Indiana University of Pennsylvania, The Pennsylvania State University, and Temple University) operates a Professional Personnel Development Center to focus on the CTE teacher and administrator certifications. Annually, the Centers provide pre-service and in-service professional personnel development services for career and technical educators in the respective regions of the Commonwealth. Each university ensures the certification programs are based on research and cover topics including curriculum development,
integration, instructional practices, parental and community involvement, PDE initiatives, and current trends in education.

In Pennsylvania, all teachers and administrators must hold either an instructional or career and technical instructional certification to be employed in a secondary school entity. State standards exist for teacher preparation programs and the teacher preparation programs must align to state standards and ensure the certification programs meet state statutes or regulations. The three Professional Personnel Development Centers prepare CTE teachers and administrators and recommend them to the Department for certifications.

In all three regions of the state, Center staff meetings were held regularly to share “notes from the field” and discuss topics of interest to the schools. Also, professional development experiences are developed based on a comprehensive needs assessment with input from the following sources:

a. Advisory groups made up of volunteers from the group for which the experience is intended; and

b. Evaluative data collected from previous participants in similar activities.

Professional development activities include:

a. Opportunities to acquire new knowledge and skills related to the instructors’ occupational area so they can provide dynamic, innovative CTE instruction;

b. Discussions related to educational delivery methods and instructional techniques;

c. Resources and current information on PDE BCTE initiatives; and

d. Collaborations and networking opportunities with other education professionals.

In addition, CTE educators are provided technical training on how to access, select, develop, and implement curricula materials that support statewide programs of study and rigorous challenging programs; career pathways; scope and sequence of courses, in accordance with Chapter 339; industry standards; articulation agreements; and other state and federal mandates. The professional development activities are designed to enhance the knowledge, academic integration proficiency, and skills or capabilities of career and technical instructors.

**State Leadership Funds support the Pennsylvania Technical Assistance Program (TAP).** This is a statewide initiative to increase the quality and impact of career and technical education in secondary schools and postsecondary recipients. The Department of Education offers a variety of high-quality, research-based activities, and professional education opportunities at no cost to the participating schools. A critical component of the TAP program, as assessed by the participating
school administrators, is the deployment of on-site consultants who assist with the implementation of the professional education opportunities. These consultants are called Career and Technical Distinguished School Leaders (CTDSLs). These distinguished leaders are retired superintendents and CTC administrators. They assist schools in increasing the academic and technical rigor of career and technical programs based on practical approaches learned because of authentic experience leading schools. The range of expertise has included high academic and technical curriculum standards, strategies for the delivery of quality instruction, connections to external resources, internal performance accountability, and promoting a culture of learning and professional behavior.

**Integrating Mathematics into CTE Content**

Integrating Math-in-CTE enhances the mathematical concepts that exist where math naturally intersects with CTE concepts and applications. Research shows that this model has a significant positive impact on student learning in mathematics with no loss to career and technical area content. Integrating math into CTE courses does not add more to the teachers’ workload but enhances the rigor and quality of the instruction. Specialized training and coaching will be provided.

**Integrating Pennsylvania Core Standards for Reading and Writing**

The Pennsylvania Core Standards for Reading and Writing in Science and Technical Subjects provide the foundation for the work. The 20 standards, targeted toward technical reading and writing, are applicable across all program areas. However, in contrast to mathematics, the standards are broader and have a wider range of applications than, for instance, the mathematical concept of scope. Specialized training and coaching will be provided.

2. **Implementing Career and Technical Education Programs and Programs of Study**

   a. 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.)

   Under Perkins V, Pennsylvania will update the 43 state-developed Programs of Study (POS) using the following criteria:

   1) The POS is developed by stakeholders (business, postsecondary faculty and secondary teachers);

   2) The POS is based on Classification of Instructional Program (CIP) codes;

   3) The POS is aligned to industry standards to ensure relevancy to the workforce and to identify the required technical skills;
4) The POS provides students with an opportunity to earn an industry credential;

5) The POS is aligned to state academic standards;

6) The POS is aligned to employability skills;

7) The POS is aligned to labor market needs;

8) The POS progresses in specificity;

9) The POS includes multiple entry and exit points;

10) The POS operates with credit articulation agreement; and

11) Completion of the POS leads to a recognized postsecondary credential.

For each POS, a committee will be established which includes statewide representation from business and industry, secondary and postsecondary instructors and administrators, and other interested parties. Details of each POS are found on the PDE website.

Each POS is based on a CIP title and description. The POS begins with general information that covers all aspects of the industry associated with the POS and progresses to increased occupationally specific information throughout the duration of the program.

Each POS is designed to align to industry standards and credentialing requirements. PDE defines industry standards as standards established by state or national trade or professional organizations or state or federal regulatory bodies accepted by the Department that describe what learners should know and be able to do and describe how well learners should know or be able to perform a task in a specific occupation. PDE works with Perkins recipients to identify applicable industry credentials and certifications that add value to the CTE enrollees’ opportunity to become employed. If students do not earn industry credentials/certifications at the secondary level of the POS, they can earn the industry credentials/certifications at the postsecondary level.

Each POS competency task grid will provide a link to the Pennsylvania In-Demand Occupations as well as a link to the Industry-Recognized Credentials for Career and Technical Education Programs guidebook. At the local level, if a CIP is not aligned to state or regional HPO, not on the Pennsylvania In-Demand Occupations List, or not identified as a Priority or Opportunity Occupation in the Local Workforce Development Board (LWDB) regional plan, the local recipient must provide the results of the comprehensive needs assessment and how the program(s) meets local

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4 Development of Pennsylvania POS Framework
5 Pennsylvania Program of Study Competency Task Grids
economic and education needs including in-demand industry sectors and occupations.

The Department works with academic and CTE instructors to align Pennsylvania Core Academic Standards to each POS. The POS-validated competency task grids include the academic crosswalk. Pennsylvania academic standards include the state academic standards for Career Education and Work (CEW), as adopted by the State Board of Education. Each POS addresses career preparation, career acquisition (getting a job), career retention, and advancement and entrepreneurship. Each POS competency task grid will include links to the academic PA Common Core standards, CEW academic standards, and recently released Career Ready Skills. The Department will ensure the POS, secondary through postsecondary, are inclusive of the academic standards and course work during monitoring reviews.

The Department collaborates with L&I to annually prepare labor market data including in-demand occupations. In-demand occupations are those with a large number of job openings or an above-average growth rate without already having an over-supply of existing workers. These occupations offer a qualified jobseeker a reasonable expectation of obtaining employment in the field.

Occupations on the Pennsylvania In-Demand Occupation List (PA IDOL) are presented in three categories: Today, Tomorrow, and Future. Jobs of Today require a short period of on-the-job training to become proficient and no formal postsecondary training. With some postsecondary training (i.e., certificate, apprenticeship or Associate degree), an individual can obtain employment in a Tomorrow occupation. Jobs of the Future require at least four years of postsecondary education resulting in a bachelor’s degree or higher.

After students enroll in a POS, they progress through general information regarding all aspects of the industry associated with a POS to more specific occupational skills and knowledge. As students complete sections of the POS, they can sit for industry certification exams. As students earn recognized postsecondary credentials, they can exit and enter low-skill, semi-skill, middle skill, or advance skill positions. The design of the POS also allows students who exit prior to the advanced skill positions to reenter the POS where they exited.

Each secondary entity (school district, charter school, or CTC) may apply to PDE for approval to offer the state-developed program of study. The Perkins postsecondary entities have been partners in the development of the statewide articulation agreement and alignment of secondary and postsecondary coursework. Through this process, the secondary completers may earn postsecondary credit once enrolled in the postsecondary component of the program of study. Articulation agreements allow high school students to receive postsecondary credit that counts toward graduation for their technical coursework.

The process used to develop the Programs of Study includes the following elements:
1) Incorporate and align secondary and postsecondary programs to workforce needs as follows:
   a) Using Pennsylvania approved Standard Occupational Classification (SOC) Codes;
   b) By developing a competency list based on an occupational analysis using resources such as O*NET;
   c) By aligning with Pennsylvania recognized industry-based credentials or certifications; and
   d) By securing validation of the local Occupational Advisory Committee.

2) Include coherent and rigorous academic content aligned with the Pennsylvania Core Academic Standards and relevant CTE content integrated in a coordinated, non-duplicative progression of courses that align secondary and postsecondary education to adequately prepare students to succeed in careers.

3) Include the opportunity for secondary education students to earn postsecondary education credits through dual or concurrent enrollment, articulated credit, or other avenues which lead to a Pennsylvania recognized, industry-based credential, credit bearing certificate or associate or baccalaureate degree.

4) Establish all new state developed CTE programs of study based upon the current PA IDOL lists.

5) Develop articulation agreements between secondary and postsecondary educational institutions which shall include:
   a) Content specified in courses offered by the secondary institution that aligns with course content at the postsecondary educational institution. Syllabi and/or competency lists of courses from the institutions involved must be maintained in the appropriate offices.
   b) The operational procedures and responsibilities of each party involved in the implementation of the articulation agreement.
   c) A student evaluation plan and process including descriptions of required proficiency levels and criteria for measurement.
   d) An evaluation plan that includes a review of the agreement, and renewal date not to exceed three years.
   e) A description of student admission requirements.
   f) Signatures of authorized representatives of participating institutions.
g) On an individual basis, provide options for out of county students to articulate without sanction if equivalent articulation elements are satisfied.

Each of Pennsylvania’s 43 programs of study was developed in phases and is reviewed every three years. Phase III Programs of Study were revised for the 2018-19 program year. Through this revision process, Pennsylvania ensures Programs of Study are aligned to key elements of Perkins V and meet the federal Perkins V definition.

Each POS offers a planned, non-duplicative sequence of academic and technical courses. Technical courses provide occupational skill and work-related tasks that would be performed in the workplace. The PDE-approved sequence is planned, non-duplicative technical instruction (simple courses to increasingly complex courses) within a specific CIP that progresses from general technical program knowledge of all aspects of an industry to occupationally specific content. A random menu of electives does not meet state or Perkins V requirements for a POS. Introductory competency tasks will be identified on each POS competency task grid. Students, parents, teachers, school counselors, and others will be able to identify postsecondary partners with programs of study aligned to secondary programs of study. To view current advanced credit opportunities articulated with postsecondary educational institutions, go to the equivalency search results at CollegeTransfer.net.

Each POS has multiple entry and exit points. Secondary students can enter and exit a POS throughout high school. Upon graduation, students who complete a POS exit with a high school diploma and an industry credential. Articulation agreements between secondary and postsecondary CTE programs of study allow students to continue with their POS after graduation and earn an advanced credential or degree.

Under Perkins V, the POS will be revised, where appropriate, to include technical dual enrollment or concurrent enrollment courses at the high school that lead to postsecondary credit or advanced standing in a postsecondary educational institution. Each Local Application will demonstrate how the federal Perkins funds will be used to expand opportunities for CTE concentrators to participate in accelerated learning programs that include dual and concurrent enrollment, early college high school, or early postsecondary opportunities.

Locally developed and implemented articulation agreements will be recognized in addition to the statewide articulation agreement. Articulation agreements are defined by the regulation as

(4) ARTICULATION AGREEMENT.-- The term "articulation agreement" means a written commitment--
(A) that is agreed upon at the State level or approved annually by the lead administrators of--
(i) a secondary institution and a postsecondary educational institution; or
(ii) a subbaccalaureate degree granting postsecondary educational institution and a baccalaureate degree granting postsecondary educational institution; and
(B) to a program that is--
i) designed to provide students with a nonduplicative sequence of progressive achievement leading to technical skill proficiency, a credential, a certificate, or a degree; and
(ii) linked through credit transfer agreements between the 2 institutions described in clause (i) or (ii) of subparagraph (A) (as the case may be).

The local agreement must be developed by the secondary schools and postsecondary educational institutions that recognize secondary technical education for postsecondary credit that counts toward graduation. Secondary recipients will report dual credit earned in the Pennsylvania Information Management System.

The Department will maintain the current statewide articulation agreement that provides students enrolled in CTE with the opportunity to earn college credit that counts toward graduation for their secondary coursework if they enroll at the postsecondary partner. This aligns with the state requirement to implement articulation agreements as part of a CTE program of study. The criteria for the statewide agreement have changed and now require credit articulation with a minimum of 9 credits for secondary technical coursework that count toward graduation and CIP to CIP-related offering.

When a state-developed program of study does not exist, local articulation agreements will be developed by the secondary and postsecondary recipient. Each local articulation agreement will meet the federal definition of program of study and operate under a credit articulation agreement. The local agreement can award any credit amount greater than or equal to 6 credits, of which at least 3 credits must be for technical coursework. All credits included in the agreement must count toward postsecondary graduation. The local agreement can be CIP to CIP or CIP-related. This should expand the opportunity for students who seek to pursue postsecondary education.

When both the statewide and local agreements are not possible due to restrictions set by third party accreditors or lack of a secondary program, postsecondary institution(s) will engage secondary school(s) in alignment activities to ensure secondary students are ready to enroll in entry-level postsecondary coursework. Alignment activities may include, but are not limited to, the following:

- The postsecondary institution provides secondary students with the postsecondary entrance exam at the end of their junior year.
- The postsecondary institution provides a curriculum for low-performing students to take in the secondary setting in preparation to enroll directly in first-level courses at the postsecondary level.
- The secondary and postsecondary institutions develop a dual enrollment agreement.
• The institutions develop an articulation agreement that awards fewer than six credits which count toward students' postsecondary graduation.

The demonstrated alignment activities must be designed to ensure that CTE students are able to enroll in entry-level postsecondary coursework in their major of choice.

In summary, there are three avenues that lead to greater secondary and postsecondary alignment. The following is intended as a guide to secondary and postsecondary entities.

If

• the secondary and postsecondary POS are an exact CIP to CIP match, or a CIP to CIP-related match, and

• a minimum of 9 technical credits can be articulated, and

• all articulated credits count toward the student's postsecondary graduation,

then use the statewide articulation agreement.

If

• the secondary and postsecondary POS are an exact CIP to CIP match, or a CIP to CIP-related match, and

• a minimum of 6 credits can be articulated, and

• at least 3 of the articulated credits are technical credits, and

• all articulated credits count toward the student's postsecondary graduation,

then use the local articulation agreement.

If

• fewer than 6 credits that count toward postsecondary graduation can be articulated, or

• fewer than 3 technical credits can be articulated (e.g., if an external accreditation or licensing body precludes the articulation of secondary technical credits),

then develop a local agreement that demonstrates alignment activities to ensure that secondary completers are prepared to enroll in the entry-level postsecondary courses.
b. 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 132 will:

1) Promote continuous improvement in academic achievement and technical skill attainment;

2) Expand access to career and technical education for special populations; and

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

PDE will continue to use the existing secondary program approval process. Each secondary entity that seeks program approval must provide evidence that the CTE POS or CTE program aligns with local workforce development needs and that the program prepares students for employment and is supported by local employers. The Department will look for alignment to local workforce needs and representation from local or regional employers from the program related industries on the Occupational Advisory Committee (OAC). To receive funding, each Perkins recipient must offer programs of study in at least three different career fields.

During the 2021-2022 year, Perkins postsecondary recipients will seek approval through the electronic approval system. Until the system is finalized, the Department will utilize an existing postsecondary database that provides a list of Programs of Study that postsecondary educational institutions offer and are recognized as approved occupational programs. The occupational programs must meet the Perkins V definitions of Career and Technical Education and “Program of Study.” The list demonstrates that the programs have been approved by the institutions Board of Trustees, accrediting authorities (national, regional or program specific [NAECP] accrediting authorities), and PDE/State Board for Career and Technical Education.

The criteria found in the postsecondary electronic approval system include Labor Market Need, Summary of Comprehensive Needs Assessment, Program Content and Industry Standards, Student to Instructor Ratio, Equipment and Supplies, Safety Practices, Performance Indicators, Certifications Available to Students, and Instructor Credentials.

Since each CIP is aligned to Pennsylvania in-demand occupations, the postsecondary portion of the POS is aligned to workforce needs.

According to PDE regulation, each secondary CTE program and POS is approved for a 5-year period. At the end of the 5-year cycle, the secondary school must seek

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6 Program Approval – Section 339.4 (22 Pa. Code § 339.4)
re-approval. As part of the re-approval process, the secondary school must document the workforce needs and provide evidence that the program is supported by local employers and the local workforce development board. For each approved program the school also must provide data that demonstrates the program meets local economic and education needs including in-demand industry sectors and occupations. Schools must provide report(s) prepared by the local workforce development board demonstrating that the program prepares graduates for regional in-demand occupations.

Another standard that must be met for re-approval of a state secondary CTE program is to establish and meet levels of performance on several accountability indicators, as determined by the levels established for the Perkins local application. Each secondary recipient reports annually on the level of performance and examines the status of meeting the targets. Four of the indicators used for program approval and re-approval at the secondary level focus on academic and technical skill attainment. The school examines data related to challenging state academic standards adopted under the Every Student Succeeds Act (ESSA) as measured by the academic assessment and CTE concentrators who graduate high. In addition, the school examines data related to the state mandated end-of CTE POS assessment which measures student technical achievement. If they do not meet levels of performance, they must provide a compliance plan that indicates how they will meet levels of performance and promote continuous improvement over the coming year.

For state program re-approval, each secondary Perkins recipient’s performance on accountability measures is reviewed at the recipient and program level. This review and analysis ensure the Perkins recipient is meeting the targets and allow the recipient to ensure the needs of each special populations category is being met. This method also allows the Department to determine if it needs to direct resources to address a category of special population to ensure all special populations’ needs are being met. The Perkins recipient provides evidence of this when they submit their local application and during on-site reviews.

Additional state secondary CTE program approval criteria include:

1) Description of the program or POS and demonstration of standards-based philosophy;

2) Evidence that the instructional equipment is comparable to industry needs;

3) Evidence of the length of time students will be scheduled into a program;

4) Evidence that each secondary CTE teacher will hold a valid certificate for the teacher’s assigned position;

5) Evidence that adequate resource material will be available to support the instructional program plan as required by program accrediting authorities, if
applicable, or recommended by the OAC;

6) Evidence that supports, services, and accommodations will be available to disadvantaged, disabled, or limited English-speaking students;

7) Evidence that school entities will provide students adequate supports to meet academic standards; are consistent with the student’s individual education plan (IEP), when applicable; and that instruction in these academic areas at all school entities where the student is enrolled is appropriate to the chosen area of occupational training;

8) Evidence of articulation between secondary and postsecondary educational institutions within a service area and system promoting seamless transition to ensure the maximum opportunity for student placement including opportunities for concurrent enrollment or dual enrollment or other strategies that promote acquisition of postsecondary credit while still in high school;

9) Evidence of program sponsorship or involvement, or both, in Career and Technical Student Organizations (CTSOs);

10) Evidence, if a program submitted for reapproval is reduced in hours, that the reduction in hours will not result in a less effective education program being offered;

11) Evidence that joint planning occurs between the CTC and school district of residence around the academic and other needs of attending students; and

12) Evidence that students are following an educational plan and have a career objective.

As part of the annual local application submission, each recipient is required to address special population’s student academic performance, technical skill attainment, and access to high-skill, high wage, high-demand education and training. The recipients indicate how Perkins funding accommodates students with disabilities, English Learners, and students who are economically disadvantaged as well as each category of special populations, as required under Perkins V. Department staff then ensure each Perkins recipient’s local plan addresses the areas of need.

PDE is responsible for reviewing and approving Adult CTE programs. Similar to the secondary program approval process, Perkins recipients offering Adult CTE programs must demonstrate how each program meets local or regional labor market need. The program curriculum must be planned and developed in consultation with the community and business representatives. Each program must provide evidence that it is aligned to industry standards and that students are eligible to sit for industry credential exams. Each program also must have instructional materials and equipment that sufficiently meet industry standards.
Specific criteria for assessing the extent that the local application will promote continuous improvement in academic achievement and technical skill attainment are as follows:

The criteria for assessing the extent that the local application will promote continuous improvement in academic achievement and technical skill attainment are as follows.

Secondary Application Review Criteria:

1) The action plan demonstrates meaningful progress on performance indicators including all subgroups. These are the activities that will be carried out during the current fiscal year.

2) The end-of-year performance report demonstrates meaningful progress on performance indicators including all subgroups. The performance report explains how the grant recipient implemented activities to demonstrate meaningful progress.

Postsecondary Application Review Criteria:

1) Review the academic achievement and technical attainment objectives and ensure the activities support meaningful progress.

2) Review the academic achievement and technical attainment objective and review the outcome measures the recipient identifies, which can include graduation rate, completion rate, transfer out rate, occupational license or technical certificate earned, academic achievement, technical skill attainment.

Beginning with the 2020-21 school year, postsecondary Perkins recipients also will enter program information in the Department’s electronic approval system and provide information on each program that Perkins V funds will support. PDE will review and act on each postsecondary program the 2021-2022 program year. Program approval includes information on: Labor Market Need, Summary of Comprehensive Needs Assessment, Program Content and Industry Standards, Student to Instructor Ratio, Equipment and Supplies, Safety Practices, Performance Indicators, Certifications Available to Students, and Instructor Credentials.

As the Department approves and re-approves secondary CTE programs, secondary Perkins recipients must demonstrate compliance with equity and access standards. This includes providing evidence that services and accommodations will be available to disadvantaged, disabled, or limited English-speaking students enrolled in CTE programs and supported by the district of residence, in accordance with applicable law, service agreements, and student IEPs. Re-approval requires evidence that school entities provide students with adequate support to meet academic standards, as determined by Pennsylvania State Board of Regulation Title 22, Chapter 4, and, when applicable, are consistent with the student’s IEP, and that instruction in these
academic areas at all school entities where the student is enrolled is appropriate to
the chosen area of occupational training.

Review of the special populations section of the application will require the recipient
to describe how the recipient is addressing the expansion of access to special
populations.

The Department will use the following criteria for assessing the extent by which a
Perkins recipient is expanding access to CTE for special populations:

1) Targeted activities support expansion of access for special populations to CTE,
as demonstrated in the special population objectives and activities section of the
application; and

2) Outcomes demonstrate meaningful progress to increase expanded access to
special populations into CTE programs, as presented in the special populations
objectives and activities and outcome measures sections of the application.

Pennsylvania collects data on special populations categories by Perkins recipient
and by program. Based on the past three years of data, the overall enrollment in the
special populations categories associated with Perkins V continues to increase. See
Tables 2 and 3. Following are a list of specific state strategies used to approve CTE
programs locally and the criteria used to determine the extent a local application will
expand access to CTE for special populations:

1) Department emphasis on special populations and analysis of performance
levels on each of the Perkins V indicators by Perkins recipient.

Through the Comprehensive Local Needs Assessment, the local Perkins
recipients will conduct an evaluation of the use of Perkins funds, using both
qualitative and quantitative methods. The evaluation will be part of the local
application. Department staff will analyze each Perkins recipient’s impact on
each of the special populations categories including meeting locally determined
levels of performance.

As part of the annual local application submission, each recipient is required to
address special population’s student academic performance, technical skill
attainment, and access to high-skill, high wage, high-demand education and
training. Recipients indicate how their use of funds accommodates students with
disabilities, English Learners and economically disadvantaged students. Staff
then ensures each Perkins recipient’s local application addresses the areas of
need.

2) Department review of Perkins performance levels during state re-approval
of CTE POS and programs.

For state program re-approval, each Perkins recipient’s performance on
accountability measures is reviewed at the building and program level. This
review and analysis ensure the Perkins recipient is meeting the targets and allow the recipient to ensure the needs of each special populations category is being met. This method allows the Department to determine if it needs to direct resources to address a category of special population to ensure all special populations’ needs are being met.

3) **Department emphasis on equal access during on-site reviews.**

PDE staff visit Perkins recipients to ensure compliance with federal and state regulations. The regulations outline the expected standards of development, admission, and operation of quality CTE programs. The qualitative review ensures recipients designed CTE programs to enable special populations to enroll without discrimination and to prepare for further education and training in occupations aligned to Pennsylvania industry sectors.

4) **Department emphasis on equity in technical assistance and professional development.**

The Department has a partnership with the Pennsylvania Association of Career and Technical Administrators (PACTA). PACTA representatives serve on the BCTE strategic planning committee and assist in identifying action steps the Bureau, with PACTA’s assistance, can take to improve student academic and technical achievement, increase business engagement, develop K-12 pathways, serve special populations students, address academic and technical proficiency, and expand career development. Department provides PACTA with support and input into professional development and technical assistance for instructors and administrators in CTE settings.

Each year BCTE holds the statewide “Integrated Learning Conference: The School to Career Connection” to highlight academic and technical integration strategies. The conference has concurrent sessions and consists of six strands focused on the following educational topics: 1) programs of study; 2) school counselor; 3) special populations (non-traditional, English Learners, economically disadvantaged, homeless, youth aged out of foster care, etc.); 4) academic integration; 5) teacher effectiveness; and 6) instructional leader.

The Department also supports the Pennsylvania Association of Career and Technical Education Special Populations (PACTESP) annual conference. The purpose of the conference is to provide professional development to CTE and regular education personnel to increase and align support and services to special populations students. Sessions are designed for secondary and postsecondary settings. BCTE annually provides a pre-conference workshop on supporting special populations students so that they can be successful in CTE programs and future employment.
The Department’s annual Data Summit offers attendees an opportunity to learn, network, ask questions about, and discuss education data with peers and leaders from across the state and nation. Keynote speakers and breakout sessions are strategically coordinated to provide attendees with information, resources, and tools on a wide variety of topics that change each year. Each year attendees explore topics such as data governance, data reporting and quality, data-informed decision making, and more. The goal is for each attendee to experience impactful professional learning opportunities, gain technical skills, and return to their school community with a better understanding of data and how they can use it to support and benefit the students they serve.

Regional professional development workshops are provided to support local efforts to attract and retain students in their non-traditional programs. These programs provide faculty and administrators with tools they can use to recruit and sustain to graduation students that are underrepresented in CTE programs in both secondary and postsecondary recipients.

5) Department participation on the State Leadership Transition Committee.

The State Leadership Transition Committee is an interagency committee comprised of representatives from the Pennsylvania Departments of Education, Human Services, Health, and Labor and Industry. The committee established a Memorandum of Understanding (MOU) to promote interagency collaboration and cooperation to assist students and young adults with any type of disability as they transition to a job, postsecondary education, or independent living. The Transition Committee supports 70 Local Transition Coordinating Councils (LTCC) across Pennsylvania with identifying potential supports and services for transitioning students.

6) Department support and alignment of Nontraditional Occupations to POS.

Nontraditional occupations refer to jobs that have been traditionally filled by one gender. Within nontraditional occupations individuals from one gender comprise less than 25 percent of the individuals employed. Examples are males in nursing and childcare or females in technologies and plumbing. Promoting nontraditional career opportunities opens doors for every individual. A list of Non-Traditional Occupations by POS is located on the PDE website.

The Department has worked with Commonwealth Media Services to develop recruitment materials that can be used by the Perkins recipients. The recruitment materials will be completed by June 2020 and disseminated by August 2020.

In conjunction with the Pennsylvania Department of Labor and Industry, which has sought to expand the representation of nontraditional workers in apprenticeships, PDE has sought to expand access to, and equity and inclusion...
in, nontraditional fields for learners. A state workforce development initiative called PAsmart has invested $70 million since 2019 in apprenticeships, industry partnerships, and STEM education, with an emphasis on expanding access and inclusion to nontraditional populations in technical career fields. $40 million of PAsmart funds have been granted to pre-Kindergarten through postsecondary educational entities for projects designed to increase the participation of underrepresented students, including girls and women, in STEM and computer science.

Table 2: Secondary Enrollment in CTE by Special Populations Category by School Year

<table>
<thead>
<tr>
<th></th>
<th>2015-16</th>
<th>2016-17</th>
<th>2017-18</th>
<th>Overall Increase or Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Secondary Enrollment (9-12th Grade)</td>
<td>546,617</td>
<td>541,921</td>
<td>538,117</td>
<td>-1.6%</td>
</tr>
<tr>
<td>Secondary CTE Enrollment</td>
<td>67,648</td>
<td>67,294</td>
<td>67,248</td>
<td>-0.6%</td>
</tr>
<tr>
<td>Percent Enrolled in CTE</td>
<td>12.4%</td>
<td>12.4%</td>
<td>12.5%</td>
<td>1.0%</td>
</tr>
<tr>
<td>CTE Participants (At least 10% of the program earned)</td>
<td>64,166</td>
<td>63,847</td>
<td>63,601</td>
<td>-0.9%</td>
</tr>
<tr>
<td>Female</td>
<td>26,714</td>
<td>26,574</td>
<td>26,562</td>
<td>-0.6%</td>
</tr>
<tr>
<td>Male</td>
<td>37,452</td>
<td>37,273</td>
<td>37,039</td>
<td>-1.1%</td>
</tr>
<tr>
<td>Race/Ethnicity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Indian/Alaskan Native</td>
<td>147</td>
<td>163</td>
<td>165</td>
<td>12.2%</td>
</tr>
<tr>
<td>Asian</td>
<td>820</td>
<td>872</td>
<td>884</td>
<td>7.8%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>8,304</td>
<td>8,439</td>
<td>8,071</td>
<td>-2.8%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>6,868</td>
<td>7,247</td>
<td>7,366</td>
<td>7.3%</td>
</tr>
<tr>
<td>Multi-Racial</td>
<td>1,089</td>
<td>1,114</td>
<td>1,230</td>
<td>12.9%</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>34</td>
<td>38</td>
<td>48</td>
<td>41.2%</td>
</tr>
<tr>
<td>White</td>
<td>46,904</td>
<td>45,974</td>
<td>45,837</td>
<td>-2.3%</td>
</tr>
<tr>
<td>Disabilities Status</td>
<td>17,825</td>
<td>17,899</td>
<td>17,975</td>
<td>0.8%</td>
</tr>
<tr>
<td>Economically Disadvantaged</td>
<td>31,849</td>
<td>33,644</td>
<td>33,640</td>
<td>5.6%</td>
</tr>
<tr>
<td>Single Parents</td>
<td>302</td>
<td>231</td>
<td>213</td>
<td>-29.5%</td>
</tr>
<tr>
<td>Displaced Homemakers</td>
<td></td>
<td></td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Limited English Proficient</td>
<td>1,192</td>
<td>1,301</td>
<td>1,651</td>
<td>38.5%</td>
</tr>
<tr>
<td>Migrant Status</td>
<td>30</td>
<td>37</td>
<td>31</td>
<td>3.3%</td>
</tr>
<tr>
<td>Nontraditional Enrollees</td>
<td>8,255</td>
<td>8,183</td>
<td>8,295</td>
<td>0.5%</td>
</tr>
</tbody>
</table>

Sources: PA Enrollment Reports, CTE Enrollment, Consolidated Annual Perkins Report
### Table 3: Postsecondary CTE Enrollment at Perkins-Allocated Institutions by Special Populations Category by School Year

<table>
<thead>
<tr>
<th>Category</th>
<th>2015-16</th>
<th>2016-17</th>
<th>2017-18</th>
<th>Overall Increase or Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>Postsecondary CTE Enrollment</td>
<td>75,563</td>
<td>72,804</td>
<td>70,627</td>
<td>-6.5%</td>
</tr>
<tr>
<td>CTE Participants (At least one credit of the program earned)</td>
<td>70,247</td>
<td>67,088</td>
<td>65,656</td>
<td>-6.5%</td>
</tr>
<tr>
<td>Female</td>
<td>40,697</td>
<td>37,375</td>
<td>38,024</td>
<td>-6.6%</td>
</tr>
<tr>
<td>Male</td>
<td>29,550</td>
<td>29,713</td>
<td>27,632</td>
<td>-6.5%</td>
</tr>
<tr>
<td>Race/Ethnicity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Indian / Alaskan Native</td>
<td>214</td>
<td>195</td>
<td>193</td>
<td>-9.8%</td>
</tr>
<tr>
<td>Asian</td>
<td>1,821</td>
<td>1,814</td>
<td>2,265</td>
<td>24.4%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>12,248</td>
<td>10,719</td>
<td>12,150</td>
<td>-0.8%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>5,803</td>
<td>5,938</td>
<td>6,760</td>
<td>16.5%</td>
</tr>
<tr>
<td>Multi-Racial</td>
<td>1,320</td>
<td>1,451</td>
<td>1,643</td>
<td>24.5%</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>92</td>
<td>81</td>
<td>79</td>
<td>-14.1%</td>
</tr>
<tr>
<td>White</td>
<td>41,715</td>
<td>40,140</td>
<td>37,344</td>
<td>-10.5%</td>
</tr>
<tr>
<td>Unknown</td>
<td>7,034</td>
<td>6,750</td>
<td>5,222</td>
<td>-25.8%</td>
</tr>
<tr>
<td>Disabilities Status</td>
<td>3,521</td>
<td>3,495</td>
<td>3,511</td>
<td>-0.3%</td>
</tr>
<tr>
<td>Economically Disadvantaged</td>
<td>32,382</td>
<td>30,087</td>
<td>31,279</td>
<td>-3.4%</td>
</tr>
<tr>
<td>Single Parents</td>
<td>5,865</td>
<td>5,391</td>
<td>5,695</td>
<td>-2.9%</td>
</tr>
<tr>
<td>Displaced Homemakers</td>
<td>618</td>
<td>614</td>
<td>452</td>
<td>-26.9%</td>
</tr>
<tr>
<td>Limited English Proficient</td>
<td>1,400</td>
<td>1,606</td>
<td>1,552</td>
<td>10.9%</td>
</tr>
<tr>
<td>Migrant Status</td>
<td></td>
<td></td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Nontraditional Enrollees</td>
<td>12,240</td>
<td>11,828</td>
<td>11,191</td>
<td>-8.6%</td>
</tr>
</tbody>
</table>

Sources: PA Enrollment Reports, CTE Enrollment, Consolidated Annual Perkins Report

Employability skills are addressed in each program of study through existing state regulation. At the secondary level each school district, charter school, and CTC must include the CEW academic standards adopted by the Pennsylvania State Board of Education. These academic standards include knowledge and skills of career awareness and preparation, career acquisition or getting a job, and career retention and advancement.

The state also developed a K-12 continuum for career readiness skills, in cooperation with the Department’s Office for Safe Schools and cross-sector committee comprised of representatives from Pennsylvania Office of Child
Development and Early Learning (OCDEL), PA Keys, Pennsylvania Training and Technical Assistance Network, Berks Intermediate Unit, and L&I. The Career Readiness Skills (CRS) include self-awareness and self-management, establishing and maintaining relationships, social problem-solving skills. All schools are asked to incorporate the CRS into existing curriculum, and are found on Career Ready PA.

All postsecondary Perkins recipients also must include employability skills in the CTE program of study. The state will collect and disseminate promising practices to assist postsecondary recipients to include employability skills in the CTE POS. The Department will provide a link to the employability skills on the finalized technical skills task grids.

Below are the criteria the Department will use to assess the extent to which the local application supports the inclusion of employability skills in programs of study and career pathways:

1) Review of the employability skills section and ensure the activities support inclusion of employability skills in the CTE program of study.

2) Review the employability skills section and review the outcome measures the recipient identifies as supporting the inclusion of employability skills in the CTE program of study.

C. Describe how the eligible agency will:

1) 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.

Pennsylvania has numerous resources that address programs of study and provide related guidance and advisement on careers. The materials are available to students, families, and secondary and postsecondary education partners in a variety of formats and languages and are ADA compliant.

Resources include:

a) Information on college credits earned through the CTE POS7

b) SOAR Flyer

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7 POS Articulation
c) **SOAR Bulletin**
d) **Spanish SOAR Bulletin**
e) **Career Ready PA**

Each resource notes the availability of college credit for time spent in the secondary CTE program of study. Pennsylvania will revise the resources to reflect the revisions to programs of study required under Perkins V. The resources then will be disseminated by email and posted on the Department of Education’s and partner websites. These materials are also duplicated and sent to secondary and postsecondary educational institutions offering the CTE POS.

The Department developed several toolkits to assist schools with providing Advanced Placement, dual enrollment, and work-based learning opportunities for students. The following toolkits are available on the PDE website:

a) **Advanced Placement Program Toolkit**

b) **Dual Credit Program Toolkit for Pennsylvania School Entities**

c) **Independent Study Program Toolkit**

d) **International Baccalaureate (IB) Program Toolkit**

e) **Work-Based Learning Toolkit**

Pennsylvania is developing information on career pathways that will be used during the 2019-20 school year. The template can be used by the recipients with parents/guardians, student and others.

**Pennsylvania Career Pathways**

Family and Consumer Sciences Scope and Sequence

The Department continues to work with instructors, and career and school counseling staff as they implement the state CEW academic standards. Local schools are developing and finalizing comprehensive K-12 guidance plans that have been approved by the district school board. The Department also maintains a number of resources for counselors ⁸ to use and are found on the Department website.

In addition, the Career Education and Work assessment continues to be available through NOCTI to address student understanding of the CEW

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⁸ [Counselor Resources](#)
academic standards areas – Career Awareness and Preparation, Career Acquisition, Career Retention and Advancement, and Entrepreneurship.

The Department provides resources to assist all K-12 schools in Pennsylvania with implementing the CEW standard strand of career awareness and preparation.

PA Career Zone is a free, interactive website that middle school and high school students can use to explore the careers of interest and develop an individualized portfolio. The website has a skills profiler for students to assess their skills and interests and then connect with careers aligned to those strengths. They also can use the site develop a printable resume, find postsecondary programs, and determine if a given salary will support a preferred lifestyle.

In 2019, the Department expanded PA Career Zone to include an elementary section called Up the Ladder. Up the Ladder using gaming elements and badges to encourage young students to exploring career pathways. The animated interface is especially colorful, interactive, and responsive. Students can go in depth into various careers and learn what it takes to succeed in each of them. The young students’ experience is guided with an optional voice narration for lower reading levels. Up the Ladder is an excellent way to begin career discussions in the elementary grade levels and sets students up for success as they start exploring the rest of the PA Career Zone offerings in middle school.

The Pennsylvania Academic Standards for Career Education and Work are fully integrated into Up the Ladder and PA Career Zone. As such, they provide teachers essential tools to show the relevance of each student’s educational experiences to their individually chosen career pathways.

In November 208, Pennsylvania launched a new data dashboard called Future Ready PA Index to provide the public with a more comprehensive look at how Pennsylvania’s schools are educating students. The dashboard illustrates student and school success using the following measures:

- State Assessment measures demonstrate student performance on state assessment exams and include data from the Pennsylvania Value-Added Assessment System (PVAAS), which represents the academic growth of students.

- On-Track measures highlight regular attendance and indicate progress in reading and math and in English Language proficiency.

- College and Career-Ready measures illustrate how well students are being prepared for postsecondary success by showing access to rigorous coursework (i.e., Advanced Placement, dual credit and CTE SOAR programs) and by identifying industry-based credentials earned by all
public high school graduates. The Postsecondary Outcomes indicator shows the percent of high school graduates enrolling in postsecondary education, enlisting in the military and entering the workforce within 16 months of graduations.

The data for each indicator is disaggregated by student group – including economically disadvantaged students, English Learners, students receiving special education services, and racial and ethnic groups. This allows parents and their communities to better understand student performance among the different groups and for schools to identify student groups where additional support may be needed.

Based on a meeting with Community College representatives, the Department will design a strand for the Integrated Learning Conference for Perkins Postsecondary recipients that focus on promising practices on student engagement, Local Comprehensive Needs Assessment, data collection, sharing data, non-traditional, ADA, student retention.

2) **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.**

Programs of Study are developed at the state level. The Department organizes statewide committees comprised of secondary instructors and postsecondary faculty along with business representatives for each POS content area. The members of the statewide committees discuss their respective program content and define the technical content of POS, with particular focus on the needs of business and how the technical content is delivered at the secondary level and aligns to the postsecondary technical content.

The Department continues to better align courses to increase flexibility of the courses and experiences so they can be shared across multiple Programs of Study and to shift with industry needs in general. During the statewide Programs of Study committee members identify potential courses and how the courses align to increase flexibility for students.

The Department continues to examine needs around the development and coordination of the Programs of Study. During state plan development process, stakeholders recommended developing or identifying resources that help students understand the full scope of careers within a pathway, the multiple entry and exit points, and how the full career pathway affects personal finances. The Department will ask the statewide committee to recommend resources that Perkins recipients can use to assist students in understand the full scope of careers within a pathway. The resources will be disseminated to the schools and postsecondary educational institutions.
The Department provides multiple opportunities for schools and postsecondary partners to highlight promising practices regarding collaboration. One example is the annual Integrated Learning Conference, which includes a Program of Study strand. The annual Standards Aligned Systems Conference also brings together secondary and postsecondary representatives to share their promising practices. The annual Department run Data Summit provides the opportunity for secondary and postsecondary to collaborate and meet to discuss the use of data to increase opportunities for students and improving student achievement.

The Department collects promising practices related to career development and postsecondary preparation, such as college and career pathways, employability skills, work-based learning, postsecondary transitions, and engagement of business, community, workforce provides these promising practices. The resources then are made available via the CTE Resources.

During August 2019, the Department held a statewide meeting that examined the existing Program of Study development process and statewide articulation agreement. Based on the statewide meeting the Department is making the following changes that will lead to higher quality CTE as well as increase collaboration among secondary, postsecondary and business in the development and coordination of statewide Programs of Study.

Based on the August 14 postsecondary meeting and request for postsecondary to develop local articulation agreements, the Department will recognize locally developed and implemented credit articulation agreements in addition to the statewide articulation agreement. The local agreement must be credit articulation agreements as defined in Perkins V and recognize secondary technical education for postsecondary credit that counts toward postsecondary graduation. The local agreement can award any credit amount but not less than 6 credits, of which 3 credits must be technical credits. The local agreement can be CIP to CIP or CIP-related. This should expand the opportunity for students who seek to pursue postsecondary education. Secondary recipients will report dual credit earned in the Pennsylvania Information Management System.

Under Perkins V, the program of study will be revised, where appropriate, to include technical dual enrollment or concurrent enrollment courses at the high school that lead to postsecondary credit or advanced standing in a postsecondary educational institution. The articulation agreements will be limited to the programs of study and direct connection of classification of instructional program (CIP) to CIP or CIP-related program and the awarding of a minimum of 9 transcripted credits for secondary technical coursework that count toward postsecondary graduation.

3) **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.

PDE asks each recipient to demonstrate how each program that benefits from federal Perkins funds meets workforce needs. The purpose is to set a standard of measure to determine the alignment of the POS to real-world industry need. The Department provides database links in the local application to ensure consistency in the alignment and has established a benchmark.

Below are the questions related to workforce need that recipients must complete as part of the local application:

a) What are the occupations for which this partnership will prepare participants?

   Applicants should use the link to cite [SOC codes](#) for the relevant occupations:

   Benchmark:

   Evidence the occupation is connected to the Program of Study.

b) What is the anticipated Entry Annual Wage that an employee can receive by entering a specific occupation listed in question a.?

   Applicants should use the link to cite the [wages for the relevant occupations](#):

   Benchmark:

   Evidence that the state Entry Annual Wage for each identified occupation is $25,000 or higher.

c) What is the projected number of new job openings that are expected for the occupations listed in question a., between 2016 and 2026?

   Applicants should use the link to cite the [projected number of job openings](#) for the relevant occupation:

   Benchmark:

   Demonstrate that the projected enrollment and graduate numbers meet or exceed workforce needs in the Workforce Development Board region.

4) **Ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations.**

   The Department ensures each secondary POS meets state and federal regulations. All secondary schools that offer Department-approved Programs of Study must have an admissions policy regarding entrance to a CTE program. The policy must state whether enrollment is unlimited or limited. If enrollment is limited, the admissions policy must include nondiscriminatory eligibility
requirements for the purpose of predicting a student’s success in a program. The admissions policy must include a nondiscriminatory selection procedure, as required by current federal and state statutes, regulations and guidelines. Postsecondary recipients have open admissions policies where the only requirement is students have a high school diploma or a high school equivalency credential.

During on-site reviews, Department staff review the secondary school’s admissions policy to confirm one exists and that it provides equitable access to the Programs of Study. When it is discovered that an admissions policy does not exist, the Department provides a sample admissions policy for secondary schools to use to develop their School Board approved admissions policy.

The Department also conducts Civil Rights reviews that ensures Programs of Study are accessible and that individuals are not discriminated against based on the ground of race, color, or national origin. The Department developed a review process to measure the compliance of publicly funded programs with Title VI of the Civil Rights Act of 1964 (race, color, national origin), Title IX of the Education Amendments of 1972 (sex), Section 504 of the Rehabilitation Act of 1973, amended in 1990 (handicap) regulations (nondiscrimination requirements in the provision of career and technical education programs) and the Age Discrimination Act of 1975. Guidelines explain the civil rights responsibilities of recipients of federal financial assistance that offer or administer CTE programs.

Conducting these on-site reviews at secondary and postsecondary sites allows the Department to focus attention on the above issues. As a result of the visits, subrecipients reevaluate their policies and practices in these areas, increase their compliance with requirements set by the Office of Civil Rights, and improve access to educational benefits and services for all beneficiaries.

Disaggregating data by special populations category and by POS will allow the Department to examine data to ensure there is equal access provided to each special populations category by POS. The Needs Assessment used by the Local Recipients includes a chart that looks at race and special populations by program. The chart will allow recipients to identify possible areas of restricted access and substantiate the need to look at processes of recruitment.

The local application requires recipients to examine data by each special populations category. The reviewer asks them to establish areas of priority and to determine the strengths and improvement steps for each special populations category.

The Department also provides a special populations strand during the annual Integrated Learning Conference. Annually, the topics ensure equal access is covered and remains a focus.
5) **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 Department worked with L&I to develop the Combined WIOA state plan. Primary goals of Pennsylvania’s Combined WIOA state plan is developing a comprehensive career pathways system in Pennsylvania and expanding career pathways as the primary model for skill, credential, degree attainment, with an emphasis on those with barriers to employment, to earn a family-sustaining wage and advance their career. The Local Workforce Development Boards (LWDB) are supported by the Departments as they develop the career pathways.

The local Perkins recipients are required to work with the LWDBs. Secondary recipients include LWDB members on their school wide local advisory committees and on the individual Programs of Study advisory committees. Under Perkins V, the Perkins recipients also include LWDB representation on the stakeholders committee. Perkins postsecondary recipients partner with the LWDB on the One-Stop Centers, and the Department has LWDB representation on the state Perkins Stakeholders Committee.

The State Board for Career and Technical Education meets eight times a calendar year. Department staff request input from and provide reports to the Board as well as the board’s CTE committee. The reports are provided during each Committee and Board meeting. Committee and Board members are actively engaged in the meetings and provide input into the direction the Department pursues.

6) **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.**

The Department also administers competitive grant programs in which career and technical education providers can participate, in collaboration with other community partners, and which often benefit career and technical education students. One such initiative, the PAsmart Computer Science and STEM Advancing Grant, provides up to $500,000 per award for regional, cross-sector, collective impact approaches to expanding computer science and STEM education following the national STEM Ecosystem model. Funded projects have included a postsecondary-secondary-industry partnership in which high school students earn computer science credentials by high school graduation, and a postsecondary-secondary-industry partnership in which rural students in a regional robotics network apply drone operations skills to needs in agriculture. Another career readiness initiative is Teacher in the Workplace, which provides local education agencies with funding and technical assistance for educators to
establish and maintain relationships with regional businesses, to engage in hands-on career experiences, and to modify their educational offerings to better prepare students for high-priority occupations. Outcomes of Teacher in the Workplace include more project-based learning relevant to career skills for pre-kindergarten through twelfth grade students, and students’ increased awareness, especially at the elementary level, of available careers and the career applications of the core curriculum.

All local applications address all aspects of an industry with each Perkins secondary and postsecondary recipient responding how they use Perkins funds to support all aspects of an industry. Activities include, but are not limited to, the following: purchasing equipment that is recommend by the Occupational Advisory Council (OAC) and is used in industry; job shadowing; field trips/site visits to businesses related to the POS; internships, externships, pre-apprenticeships and industry mentoring programs; and cooperative education.

Pennsylvania requires all secondary Programs of Study to provide students the opportunity to participate in work-based learning and to acquire experience in appropriate work situations related to their POS. When the traditional shop or laboratory cannot simulate the work situation, the classroom may be extended to a cooperating agency or business if the educational objectives are being met. Health occupations curriculum preparing individuals for direct patient care must provide clinical experience as an integral part of the curriculum.

Postsecondary recipients require internships, field placement, and service learning as part of their portion of the POS. Pennsylvania is supporting all aspects of an industry, which includes work-based learning opportunities for postsecondary students. Therefore, only programs that provide all aspects of an industry are eligible for Perkins funds.

The Department assists secondary schools and postsecondary institutions with developing and offering all aspects of an industry including work-based learning.

The Department is committed to providing regular updates on the implementation of its approved ESSA Consolidated State Plan and the Future Ready PA Index. The Industry-Based Learning Indicator – one of six College and Career Measures on the Future Ready PA Index – evaluates how students are engaging in work- and classroom-based activities by 12th grade. Effective the 2017-18 school year, all LEAs began reporting student level data for this indicator; prior to 2017-18, data was limited to CTE students.

The Department supports the implementation of all aspects of the industry by providing guidelines and promising practices to schools.

- The Department has guidelines to help educators connect to business and establish advisory committees for CTE program. Business partners
can help educators on program improvement and curriculum content, and support CTE programs through work-based learning experiences.  
Advisory Committee Guidelines

- The Department developed guidelines for implementing work-based learning to assist administrators and cooperative education teacher-coordinators in complying with federal and state laws regarding cooperative education. The guidelines address regulations and operational issues that should be followed to ensure an effective work-based learning environment for all students.

- The Department’s Work-based Learning Toolkit provides teachers and school administrators with a basic understanding of the many types of experiential learning and how to implement those programs into their schools.

Other resources are found on the CTE Resources website that support local collaboration such as promising practices on engagement of business.

Forums such as the PDE Standards Aligned System (SAS) Institute highlight how education is connecting with employers and establishing career pathways that include work-based learning experiences. The SAS Institute has general and breakout sessions designed for postsecondary, secondary and business collaboration. The Department also uses state funds to support the development of business education platforms that connect students with employers. This includes speakers, work-based opportunities, and career exploration.

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

The Department will review the disaggregated data by Perkins recipient and by POS. This will allow the Department to identify POS areas that are successful and those that would benefit from Department resources. Targeted technical assistance will be designed and focused on improving the performance indicators and educational outcomes associated with special populations.

The Department is providing the special populations subgroup data to each Perkins recipient. This will enable the recipients to evaluate their learners’ performance on federal accountability measures and to review the data with their stakeholders. The Local Comprehensive Needs Assessment template will request information regarding special populations subgroup data. The recipients will identify the areas of strength and challenge. The recipients will identify action steps that will lead to improvement of student performance.

d. Describe how the eligible agency, if it opts 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.)

State regulation requires every approved secondary CTE program to articulate with a postsecondary CTE program. Each approved secondary CTE program demonstrates a planned process of curriculum development, instructional strategies and administrative procedures, which link educational agencies with other education agencies and with industries. The linkage helps students transition from a secondary school to postsecondary educational institution, or a registered apprenticeship without experiencing delays in or duplication of learning. During program evaluation and Perkins visits, the Department looks for seamless transition to ensure the maximum opportunity for student placement including opportunities for dual enrollment that promote acquisition of postsecondary credit while still in high school. Evidence includes articulation agreements and dual enrollment agreements. Because this is part of Department regulations and is a measure under the ESSA Career Ready Indicators, the Department will continue to support dual enrollment opportunities under Perkins V.

When the postsecondary Perkins recipient submits a local application, it will identify which Program(s) of Study it offers and identify dual enrollment agreements associated with the Programs of Study. The compliance visits will examine each dual enrollment agreement and student transcripts.

Current monitoring process looks for dual enrollment opportunity. When dual enrollment does not exist, the Department recommends that the Perkins recipient pursue the development of dual enrollment agreements/programs. Resources have been developed by the Department that can assist secondary and postsecondary recipients to develop dual enrollment agreements. The Department will work with recipients to identify promising practices around dual enrollment and disseminate the promising practices. Currently, the Department has developed a toolkit that has been disseminated on establishing dual enrollment.

CTCs may become postsecondary private licensed schools in Pennsylvania. Once the CTC obtains approval through the State Board of Private Licensed Schools, the CTC may establish dual enrollment opportunities for the students enrolled in the secondary CTE programs. The Department will continue to support CTCs that seek private licensure and will engage other CTCs to seek private licensure in areas where postsecondary opportunities are limited or do not exist.

The Department will continue to encourage current dual enrollment activities. Perkins postsecondary will work on dual enrollment with regional Perkins secondary recipients.

The Department will allow Perkins secondary recipients in areas where Perkins postsecondary recipients do not exist to work with non-Perkins postsecondary
recipients to establish dual enrollment agreements. During Department on-site visits, the Department will verify that local dual enrollment agreements exist.

The Department collects data on dual enrollment, which is an indicator that is displayed on the Future Ready PA Index. Dual enrollment credit falls under the Rigorous Courses of Study indicator and is applicable to all secondary education.

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).

The Perkins V Statewide and Regional meetings held in 2019 engaged the required stakeholders. The participants provided input into the planning of the Perkins V 4-year state plan which also supports the planning and development of the CTE Programs of Study. The input received during the meetings has led to a revision of the statewide articulation agreement and method of developing the statewide Programs of Study. The State Plan process also provides opportunity for the stakeholders to provide public comment on the State Plan as well as the hearings.

Continued engagement of the required stakeholders will occur in a number of ways. After the 4-year state plan has been implemented for a 2-year period, the stakeholders will be re-engaged to evaluate the plan and actions taken during the first 2 years of implementation.

The local application guidelines ensure that at the local level each recipient engages the required stakeholders. The Department’s review of the application as well as conducting on-site visits will ensure the required stakeholders are engaged in the planning, development, implementation and evaluation of the CTE Programs of Study.

The Department engages secondary teachers, postsecondary faculty and administrators in the development and revisions of the CTE Programs of Study. During the revision process, the committee members evaluate the implementation of the POS and plan the next steps in the revision of the POS.

Department staff participate in several conferences (academic counselor/career guidance, CTE administrators, academic teachers, CTE teachers, paraprofessionals, parents, special education educators) to provide updates on the CTE Programs of Study and solicit their input in the planning, development and implementation. The input received during the update sessions leads to improved processes.

Department staff also participate on the Pennsylvania Apprenticeship Council and provide updates on the POS. The Council is comprised of labor union and business
representatives. They are provided the opportunity to provide input into the planning, development and implementation of the POS.

f. 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(v) of Perkins V.

See Appendix B for the Secondary Local Application template.

See Appendix C for the Postsecondary Local Application template.

g. 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 3 for the requirements of the comprehensive local needs assessment under 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 Appendix D.

h. 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.

Size

Size is based on the number of CTE Programs of Study available at the eligible recipient, not on enrollment in a specific CTE program. To be eligible for funding, a Perkins recipient must have at least three CTE Programs of Study in not fewer than three different career fields, each of which must serve a minimum of eight students. An eligible recipient also must have laboratories and classrooms that are readily accessible to all students, as well as a non-discriminatory admissions policy that is board approved and implemented.

Scope

The scope of a CTE Program of Study is defined as a curriculum that covers all aspects of the industry and meets the criteria listed in the POS definition of Perkins V, including:

1) One secondary technical course per year is offered (definition of a course is 240 technical instructional hours);

2) Postsecondary programs will not have less than 50 percent occupational credit hours;
3) Secondary and postsecondary academic and technical content are aligned, leading to a sequence of courses that lead to nonduplicative course content offering;

4) Work-based learning opportunities are available to students; and

5) A credit articulation agreement exists between the secondary CTE Program of Study, and the corresponding postsecondary portion of the CTE Program of Study. A transcript review fee is acceptable, but a charge for the credits is not acceptable. When a statewide or local articulation agreement is not an option (i.e., due to restrictions set by a third party accreditor or lack of a secondary CIP), postsecondary institution(s) will engage secondary institution(s) in early postsecondary opportunities that prepare students to enroll in entry-level postsecondary coursework in their chosen major.

**Quality**

Quality of secondary programs of study is based on the state regulations for approved programs. See Title 22 Education, Chapters 4 and 339.

Quality is determined by examining the postsecondary database maintained by the Department for the 2021-2022 program year. Programs listed in the database have been approved by the institutions' Board of Trustees, accrediting authorities (national, regional or program specific accrediting authorities, and PDE/State Board for Career and Technical Education).

Perkins postsecondary then will begin to enter program information in the electronic approval system and provide information on each program that Perkins V funds will support. This includes information on:


3. **Meeting the Needs of Special Populations**

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

   1) Will be provided with equal access to activities assisted under this Act.

   2) Will not be discriminated against on the basis of status as a member of a special population.

   3) 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.

4) **Will be provided with appropriate accommodations.**

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

Department regulations require Perkins recipients to have nondiscriminatory admissions policies, that state whether enrollment is unlimited or limited. If enrollment is limited, an admissions policy must include nondiscriminatory eligibility requirements for the purpose of predicting a student’s success in each program. When the number of students predicted to be successful in each program is less than the number of openings available in that given program, the openings may be available to adults or students at another school district. When the number of students predicted to be successful in each program exceeds the number of openings available, the admissions policy must include a nondiscriminatory selection procedure, as required by current federal and state statutes, regulations, and guidelines.

Additionally, if a selection procedure is necessary to select and reject qualified applicants, as judged by established and publicized eligibility requirements, the procedure shall be nondiscriminatory under the federal and state statutes and regulations and guidelines.

Recipients must develop a recruitment program and the program must include announcements concerning CTE and must exemplify freedom from occupational stereotypes and to the extent possible the philosophy of equal access.

The Department also requires guidance personnel to provide students the information necessary to make informed decisions regarding the selection of appropriate occupational programs and discuss the importance of high school academic achievement and postsecondary education and training to career success.

The Department visits recipients to ensure compliance with federal and state regulations. The regulations outline the expected standards of development, admission, and operation of quality career and technical education programs. The qualitative review ensures the Perkins recipients have designed the CTE programs to enable the special populations categories to enroll without discrimination and to prepare for further education and training in occupations that are aligned to Pennsylvania industry sectors.

The Department’s strategies also ensure technical assistance activities and professional development are inclusive of special populations and equity. These activities have been outlined in an earlier section.
The Department’s review of Perkins recipients includes the on-site evaluation to determine that the admissions policy is nondiscriminatory. The Department also conducts Civil Rights reviews. The Department works with the U.S. Office for Civil Rights and has developed a review process that measures the compliance of the publicly funded programs with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973 amended in 1990 regulations and the Age Discrimination Act of 1975. The guidelines explain the civil rights responsibilities of recipients of federal financial assistance that offer or administer CTE programs. The Civil Rights on-site reviews focus on the identified Department regulations require approved secondary CTE programs to provide services and accommodations to disadvantaged, disabled or limited English-speaking students enrolled in CTE programs. The district of residence is required to provide services and accommodations in accordance with applicable law, service agreements and student IEPs. The Department examines specific evidence during on-site reviews and program evaluations, which includes student IEPs and service agreements.

Members of special populations are provided equal access to CTE Programs of Study (POS) and to the services available at the secondary schools and institutions of higher education. Each Perkins recipient has demonstrated that the POS they offer is preparing students for high-skill, high-wage or in-demand industry sectors or occupations. Department staff verify the alignment during the review of the applications as well as during on-site reviews. Annually, data will be provided to the Perkins recipients. They will review the data and ensure individuals in each special populations category are meeting or exceeding the SDLPs. If the individuals are not meeting SDLP the Perkins recipient identifies actions, it will take in the local application to improve performance of individuals who are members of special populations. The Department will review the actions, which could be the development or implementation of programs designed specifically for a category of special populations. If the actions appear to address the needs of the individuals, the local application will be approved. On-site monitoring of the Perkins recipient will ensure the approved program/actions are implanted and individuals are making meaningful progress. The recipients’ annual performance report requires the recipient to explain how the SDLP was or was not met and what further actions will be taken to continue to demonstrate meaningful progress.

Additionally, the Department requires entities with approved secondary CTE programs to provide students adequate supports to meet academic standards as determined by Title 22, Chapter 4 Academic Standards and Assessments and, when applicable, consistent with the student’s IEP, and that instruction in these academic areas at all school entities where the student is enrolled is appropriate to the chosen area of occupational training. Evidence that the Department examines during on-site reviews and approved program evaluations includes
transcripts, course sequences, student IEPs, support plans, and operating agreements.

The Department will require the same expectations for any postsecondary recipient applying for a Perkins V grant. The postsecondary recipient must provide evidence that appropriate services and accommodations are available and provided to each special populations category.

Integrated setting means work in a job where the person with a disability is more likely to engage with the co-workers who are not disabled. This contrasts to a job where most co-workers are persons with a disability as traditionally found in in sheltered employment settings or federal/state ‘set-aside’ contracts for agencies that use and hire individuals with disability to perform the work. On-site monitoring will ensure the Perkins recipients include work-based learning for students and that students are in an integrated setting. The Department’s approved program evaluation and approval/reapproval at the secondary level requires approved programs to provide work-based learning, which is learning associated with the CTE POS and is in an integrated setting. The approved program evaluation and Perkins on-site monitoring visits will ensure students with disability are engaged in integrated employment.

4. 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 professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V).

The Department has developed and implemented CTE teacher and administrator certification programs through contractual agreements with three state universities: Indiana University of Pennsylvania, The Pennsylvania State University, and Temple University. Each university operates a Professional Personnel Development Center to focus on the CTE teacher and administrator certifications. The Centers provide pre-service and in-service professional personnel development services for career and technical educators in the respective regions of the commonwealth. Each university ensures the certification programs are based on research and cover topics including curriculum development, integration, instructional practices, students with disabilities, English learners, parental and community involvement, Department initiatives, and current trends in education.

All teachers and administrators must hold either an instructional or career and technical I instructional certification to be employed in a Pennsylvania secondary school entity. State standards exist for teacher preparation programs and the programs must align to state standards and ensure the certification programs meet state regulations. The three
Professional Personnel Development Centers prepare CTE teachers and administrators and recommend them to the Department for career and technical instructional certifications.

In all three regions of the state, Center staff hold regular meetings to share notes from the field and discuss topics of interest to the school. Also, professional development experiences are developed based on a comprehensive needs assessment with input from the following sources:

a. Advisory groups made up of volunteers from the group for which the experience is intended.

b. Evaluative data collected from previous participants in similar activities.

Professional development activities include:

a. Opportunities to acquire new knowledge and skills related to the instructors’ occupational area so they can provide dynamic, cutting-edge CTE instruction.

b. Addressing the needs of special populations students.

c. Discussions related to educational delivery methods and instructional techniques.

d. Resources and current information on PDE BCTE initiatives.

e. Collaborations and networking opportunities with other education professionals.

In addition, career and technical educators are provided with technical training on how to access, select, develop, and implement curricula materials that support statewide programs of study and rigorous challenging programs; career pathways; scope and sequence of courses, in accordance with Chapter 339; industry standards; articulation agreements; and other state and federal mandates.

The professional development activities are designed to enhance the knowledge, academic integration proficiency, and skills or capabilities of career and technical instructors. For example, the following objectives are important in determining professional development programming:

a. Engage the teacher-learner, rather than rely on PowerPoint presentations.

b. When possible, conduct on-going group activities, rather than stand-alone workshops.

c. Create events that meet the needs of all teachers, including incumbents.

d. Promote teacher involvement in Domain 4 (Professional Responsibilities) of the PA Framework for Effective Educators.

e. Complement, but not duplicate, PDE BCTE initiatives and objectives of the Technical
Assistance Program or the Integrated Learning Conference.

The Department continues its partnership with PACTA. The partnership includes the Department’s support and input into professional development that leads to viable professional development and technical assistance for instructors and administrators in CTE settings. PACTA representatives also serve on the BCTE’s strategic planning committee and assist in identifying action steps for the BCTE, with PACTA’s assistance, can take to improve student academic and technical achievement, increase business engagement, develop K-12 pathways, serve special populations students, address academic and technical proficiency, and expand career development.

The Department’s BCTE conducts the annual Integrated Learning Conference: The School to Career Connection. This conference highlights academic and technical integration strategies. The conference is designed to share successful strategies that encourage the implementation of educational initiatives that enhance learning opportunities for all students. Over 75 concurrent sessions, three pre-conference workshops, and a variety of meetings and professional development activities are scheduled during the conference.

More than 500 participants attend the conference including instructors, administrators, counselors, postsecondary partners, and exhibitors. Presenters cover instructional strategies and showcase promising practices of career and technical education programs that improve the academic and technical skills of students through the integration of academics with career and technical education.

The Technical Assistance Program provides sustained professional development to postsecondary and secondary recipients. The sessions are inclusive of paraprofessionals, teachers, administrators and postsecondary faculty.

C. Fiscal Responsibility

1. **Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how:**

   a. **Each eligible recipient will promote academic achievement;**

   b. **Each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and**

   c. **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)**

   Each eligible agency will submit a local application to the Department that includes a section focused on academic achievement. The eligible recipient will use information from the local needs assessment to identify needs specific to the recipient’s students’ academic achievement and determine action steps that will increase student
performance. Academic achievement is not a postsecondary performance measure but will still be part of the local application and requirement for receipt of Perkins V funding. The Department’s process includes program approval outlined in the previous section and data collection related to student attainment for each Perkins recipient.

As part of the local application submission, the eligible recipient will determine action steps that will lead to increase student skill attainment. Skill attainment is not a postsecondary performance measure but will be part of the local application and requirement for receipt of Perkins V funding. Postsecondary recipients will provide data that demonstrate continuous improvement in the percentage of CTE concentrators who receive a recognized postsecondary credential.

Approved CTE programs are required to be aligned to industry standards. The standards are those established by state or national trade or professional organizations or state or federal regulatory bodies accepted by the Department that describe what learners should know and be able to do and describe how well learners should know or be able to perform a task in a specific occupation.

The Department’s process includes program approval outlined in the previous section and annual data collection related to student skill attainment including the collection of students earning a recognized postsecondary credential for each Perkins recipient.

The results of the comprehensive local needs assessment (CLNA) are part of the local application. The criteria the Department will use to ensure recipients are meeting local economic and education needs will be based on the review of the results of the CLNA.

Specific criteria for assessing the extent that the local application will promote continuous improvement in academic achievement and technical skill attainment are as follows:

**Secondary Criteria**

- The action plan demonstrates meaningful progress on performance indicators including all subgroups. These are the activities that will be carried out during the current fiscal year.

- The end-of-year performance report demonstrates meaningful progress on performance indicators including all subgroups. The performance report explains how the grant recipient implemented activities to demonstrate meaningful progress.

**Postsecondary Criteria**

- Student learning outcomes are demonstrating continuous improvement in academic achievement and technical skill attainment. E-grant/local application include student learning outcomes provided to accreditor(s).

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

b. 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)

Funds received under Section 111 for allocations to secondary and postsecondary eligible recipients are divided as follows: 70 percent to secondary recipients, 30 percent to postsecondary recipients. This funding ratio was determined by the following criteria.

1) History of set aside amounts.
2) Number of career and technical enrollees.
3) Number of career and technical programs.
4) Consideration of full-time and part-time enrollment.
5) Consideration of overlap of facilities for programs.
6) Amounts of other state/federal reimbursement.
7) Stakeholder input.

During the state and regional stakeholders meeting the current split of funds was discussed. The discussion included how the secondary and postsecondary recipients are supported by state funds, local tax dollars, and tuition funds. The Department has accepted the conclusion of the discussion and is retaining the current split of funds. Secondary Perkins recipients will receive 70 percent of the allocation and postsecondary recipients including the adult recipients will receive 30 percent of the allocation. Secondary CTE begins with the all aspects of the industry and leads to technical skills that enable secondary students to sit for credential exams. Secondary students also learn and gain technical skills to the extent that through the POS, they earn college credits for the high school technical courses. The funding amounts serve a greater geographical area and is a greater means of developing a pipeline to postsecondary experiences (apprenticeship, certificate, or degree) for high school graduates (apprenticeship, certificate, or degree).

All Perkins recipients (secondary and postsecondary) must align the academic and technical programs. The alignment is accomplished through the Department’s statewide articulation agreements and through local articulation agreements where statewide agreements do not exist. The statewide agreement allows a high school graduate in eastern Pennsylvania to enroll in an institution of higher education.
located anywhere in the state if there is a direct program to program (carpentry to carpentry) offering. Therefore, there isn’t a need for local or regional consortia to form. Statewide and local agreements and early postsecondary opportunities provides additional opportunities for students. This means each eligible Perkins recipient (secondary and postsecondary) remains an eligible agency and consortia are not formed. Because consortia are not formed, a consortia formula will not be developed and implemented.

3. For the upcoming program year, provide the specific dollar allocations for each eligible recipient 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)

Allocation total will be updated once USDE releases a state allocation amount.

During the 2020-2021 program school year, $26,843,412 will be made available to secondary consortia. Pennsylvania will continue to utilize the current formula to allocate Perkins funds to the local consortia, as USDE approved the formula and deemed it to be an objective and equitable means of allocating the funds.

Allocations are calculated based on the following formula:

a. After elimination criteria, calculate the percentage of individual population age 5-17 by dividing the individual population age 5-17 by state total population age 5-17.

b. Calculate the percentage of poverty age 5-17 by dividing individual poverty for age 5-17 by state total poverty for age 5-17.

c. 70% allocation = poverty percentage × (allocation amount × 0.7)

d. 30% allocation = individual population percentage × (allocation amount × 0.3)

e. Total allocation = 70% allocation + 30% allocation

Allocations are summed and enrollments collected using PIMS, the state longitudinal data system for education data, and a unique identification number for each student.

Percentages of total student enrollments for each member of the consortia are collected by dividing each individual member of the consortia against the total number of all enrollments within the consortia to get a final percentage for each school. Total allocation then is divided by this percentage and allocated to the consortium fiscal agent. A consortia file is generated from the PDE Office of Data Quality, which drives the distribution to the fiscal agent.
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<td>$119,738</td>
</tr>
<tr>
<td>Tunkhannock Area SD</td>
<td>$25,118</td>
</tr>
</tbody>
</table>
4. For the upcoming program year, provide the specific dollar allocations for each eligible recipient 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.

During the 2020-2021 program year, $11,504,320 will be made available to postsecondary institutions. Allocation distribution is based on a percentage derived by dividing the individual number of each institution’s student career and technical Pell count by the total number of career and technical Pell counts for all postsecondary and adult CTE programs. The percentage of career and technical Pell per institution is then applied against the total allocation awarded to the state producing a percentage of the total to be allocated to each individual postsecondary and adult CTE program.

Allocation = (# of student career and technical Pell students at the institution ÷ Sum of career and technical Pell students for all postsecondary and adult CTE programs) × Allocation Amount

### Fiscal Agent

<table>
<thead>
<tr>
<th>Fiscal Agent</th>
<th>Tentative Allocation 2019-2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tyrone Area SD</td>
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<td>York Co School of Technology</td>
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### Fiscal Agent

<table>
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<tr>
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<th>Tentative Allocation 2019-2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bucks Co CC/ Main</td>
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</tr>
<tr>
<td>Butler County Community Coll</td>
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</tr>
<tr>
<td>Central PA Institute of Science &amp; Technology</td>
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<td>Community College of Phila</td>
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</tr>
<tr>
<td><strong>TOTAL</strong></td>
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</tr>
</tbody>
</table>

5. 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.)

Distribution of funds is based on the formula. When a school district boundary changes, the formula is adjusted to reflect the changes. The formula is adjusted for the following program year and reflects the correct Census and enrollment data associated with the changed boundary.

The Department does not have local education agencies with Department approved CTE programs without geographical boundaries.
6. 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.)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

Pennsylvania’s current funding process meets the federal requirements and is viewed as the most equitable means of distributing the funds. Therefore, the Department is not seeking a waiver to the secondary allocation and did not request a waiver under Perkins IV.

7. 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)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

Pennsylvania’s current process meets the federal requirements and is viewed as the most equitable way of serving the students who can benefit from the allocation. Therefore, the Department is not seeking a waiver to the postsecondary allocation and did not seek a waiver under Perkins IV.

8. If the eligible agency will award reserve funds to eligible recipients under section 112(c) of Perkins V, describe the process and criteria for awarding those funds.

   Pennsylvania is not electing to award reserve funds.

9. 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)
The 2017-18 fiscal effort per student was $974.27.

Due to an increase in the 2019-20 Perkins State Allocation and based on guidance from USDE, Pennsylvania is not seeking to establish a new baseline for fiscal effort.

D. Accountability for Results

1. 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)

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.

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.

The Department, working with the state and regional stakeholders committee, has decided to select the program quality indicator that examines the percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.

**Numerator:** Number of CTE concentrators who graduated from high school having attained a recognized postsecondary credential (industry-recognized certificate, apprenticeship completion certificate, professional license, or degree).

**Denominator:** Number of CTE concentrators who graduated from high school.

**Calculation:** Match the 2018-19 CTE students with 480 or more cumulative hours who graduated to the last four years of CTE Industry Certification data. Determine the percent of students with a credential.

**Source:** CTE Industry Certification and CTE Student Fact in PIMS

The Department has also decided to retain the Perkins IV indicator for technical skill attainment. This indicator examines the percentage of CTE concentrators who successfully achieve competency levels at or above the Competent level on the
NOCTI Job Ready Occupational Assessments, or other PDE approved tests in the reporting year.

**Numerator**: Number of graduating career and technical education concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Specific Assessments or achieve competency on other PDE approved tests in the reporting year.

**Denominator**: Number of graduating career and technical education concentrators who complete the NOCTI Job Ready Occupational Specific Assessments or other PDE approved tests in the reporting year.

**Calculation**: Match the 2018-19 CTE students with 480 or more cumulative hours who graduated to the NOCTI-NIMS data. Determine the percent of students who achieved a level of competent or advanced.

**Source**: NOCTI-NIMS Collection and CTE Student Fact in PIMS

2. 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) of Perkins V)

3. 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:

   a. 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. (See Text Box 7 for the statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V).

   b. An explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8.

   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.

To determine the State Determined Levels of Performance, the Department and assessment specialists met and developed an hour-based definition of a course. Completion of a course is defined as completing 240 technical instructional hours. A concentrator then is a CTE student who has completed two CTE courses or 480 technical instructional hours in a Department approved secondary CTE program. The
school year in Pennsylvania is 990 instructional hours, and CTE enrollment is defined as more than one hour per day for full-time study.

The team decided to present the SDLP as percentages. The team ensured the data provided are objective, quantifiable and measurable.

In order to ensure the state makes meaningful progress, the team assisted the Department in defining meaningful progress. To determine meaningful progress, the Department formed a team of assessment professionals who had worked on the ESSA Plan. The work included performance level targeting using the meaningful progress standard. This team performed various scenarios using student level data from the Pennsylvania Information Management System (PIMS) data from previous years to model indicator methodology and meaningful progress targeting. Upon review of the scenarios, the team recommended to use the halfway to 100 percent over 12 years as the meaningful progress standard to apply to all Perkins V indicator baselines.

As required data from states that have similar CTE programs, instruction, services, and comparable CTE concentrators was reviewed. The review considered how their levels of performance aligned to Pennsylvania’s level of performance on the Perkins IV indicators. Data from New York, Ohio, Oklahoma, Virginia, and West Virginia were examined.

These states were chosen because they established area CTCs, programs offered, definitions used, calculations and methodologies used. New York and Virginia have over 250,000 concentrators. West Virginia has approximately 20,000 concentrators compared to 40,000 to 100,000 concentrators in Oklahoma, Ohio and Pennsylvania. Pennsylvania has a student level data collection system. Methodology used by each state appears to be similar. The levels of performance vary except for Pennsylvania and Oklahoma. Based on the comparison, the Department’s established the SDLPs.

Stakeholders were consulted pursuant to Section 113 of Strengthening Career and Technical Education for the 21st Century Act in order to develop the levels of performance. The Department provided proposed state levels of performance for Career and Technical Education (CTE) required indicators on November 22, 2019 and through December 6, 2019, requested written comments and input on the proposed goals for each indicator. The materials provided to the stakeholders explained the process for establishing the baseline for each accountability indicator and included the baseline for each indicator.

Additionally, the stakeholders group was invited to participate in a meeting where the Department explained the process for establishing the baseline for each indicator and for establishing the SDPL. For those interested in discussing, raising questions or concerns, or offering comments on the process and baselines, they attended the meeting on December 3, 2019. During the meeting each of the performance indicators and the method used for establishing a baseline for each indicator was reviewed and discussed.
The Department reviewed the initial comments on the preliminary SDPLs to develop and establish the levels. The SDPLs were subject to the public comment process described in Section 113 and the Department includes in this plan written response to commend provided by the stakeholders.

The final draft proposed levels were disseminated to the stakeholders for their review on December 17, 2019. Stakeholders were asked to review each indicator and provide written comment by December 27, 2019. The stakeholders were asked to review the process and baseline and provide written comment regarding either. Stakeholders were asked to submit written comments regarding how the established levels of performance:

1. Meet the requirements of the law;
2. Support the improvement of performance for all CTE concentrators including each subgroup of students and special population; and
3. Support the needs of the local education and business community.

The Department gathered written public comments on the SDPL and baseline for each indicator through designated PDE email account. The email address was posted on the Department’s website and was provided to all stakeholders. Written stakeholder comments and the Department’s response are found in Appendix E. As a result of stakeholder comments, the Department revised the SDPLs before bringing forward a final set of proposed goals for a second opportunity for public comment when the full draft state plan was released.

The SDLPs also reflect the Department’s Perkins V goals.

4. 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.

Written stakeholder comments and the Department’s response are found in Appendix E.

The Department modified three SDPL based on stakeholder feedback. Academic Proficiency in Science is not an accountability measure under Perkins V, nor are results on the Science assessment included in the federal accountability system required by ESSA, so it will not be required. Working with the U.S. Department of Education, it was determined to establish 25 percent as the target for the non-traditional indicators. For both the secondary and postsecondary Non-traditional Program Concentration indicator, the Department has developed a Performance Target Increment of .43 for Secondary Non-Traditional Program Concentration and .15 Performance Target Increment for Postsecondary Non-Traditional Program Concentration.
5. 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.)

As part of the written response, and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP)\(^9\), 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.

The Department will analyze state level data to determine gaps and disparities between subgroups. The Department will also analyze secondary and postsecondary recipient data to determine which fiscal agents have the smallest and largest disparities to determine relevant best practices to publish and present at the Perkins workshops and technical assistance efforts.

The Technical Assistance Program (TAP) will include activities that support closing gaps in performance for the subgroups. Currently the Department looks at each special populations category by accountability measure. The TAP activities are focused on closing the gaps and disparities among the various subgroups. TAP has been described in an earlier section of the State plan, and TAP services are evidence based.

### III. Assurances, Certifications, and Other Forms

#### A. Statutory Assurances

☑ The eligible agency assures that:

1. It made the State plan publicly available for public comment\(^{10}\) 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 considered 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

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\(^9\) See page 11 of the Committee Report.

\(^{10}\) An eligible agency that submits a 1-Year Transition Plan in FY 2019 is not required to hold a public comment period on the 1-Year Transition Plan. Such agency must assure that it meets this public comment requirement prior to submitting its Perkins V State Plan in FY 2020.
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).
2. Disclosure of Lobbying Activities (SF LLL) (OMB Control No. 4040-0013). 11

3. Certification Regarding Lobbying (ED 80-0013 Form).


IV. Budget

A. Instructions

1. On the form in Item IV.B below, provide a budget for the upcoming fiscal year. As you prepare your budget, refer to the statutory descriptions and assurances in Section II.C and Section III.A, respectively, of this guide.

2. In completing the budget form, provide:

   a. Line 1: The total amount of funds allocated to the eligible agency under section 112(a) of Perkins V. This amount should correspond to the amount of funds noted in the Department’s program memorandum with estimated State allocations for the fiscal year.

   b. Line 2: The amount of funds made available to carry out the administration of the State plan under section 112(a)(3). The percent should equal not more than 5 percent of the funds allocated to the eligible agency as noted on Line 1, or $250,000, whichever is greater.

   c. Line 3: The amount of funds made available to carry out State leadership activities under section 112(a)(2) of Perkins V. The percent should equal not more than 10 percent of the funds allocated to the eligible agency as noted on Line 1.

   d. Line 4: The percent and amount of funds made available to serve individuals in State institutions, such as: (a) correctional institutions; (b) juvenile justice facilities; and (c) educational institutions that serve individuals with disabilities pursuant to section 112(a)(2)(A) of Perkins V. The percent of funds should equal not more than 2 percent of the funds allocated to the eligible agency as noted on Line 1.

   e. Line 5: The amount of funds to be made available for services that prepare individuals for non-traditional fields pursuant to section 112(a)(2)(B) of Perkins V. The amount of funds should be not less than $60,000 and not more than $150,000.

   f. Line 6: The amount of funds to be made available for the recruitment of special populations to enroll in career and technical education programs pursuant to section 112 (a)(2)(C) of Perkins V. The percent of funds shall not be less than the lesser of an amount equal to 0.1 percent of the funds made available by the eligible agency for State leadership activities as noted on Line 3, or $50,000.

   g. Line 7: The percent and amount of funds to be made available to eligible recipients [local education agencies (secondary recipients) and institutions of higher education (postsecondary recipients)] pursuant to section 112(a)(1) of Perkins V. The percent

11 https://apply07.grants.gov/apply/forms/sample/SFLLL_1_2-V1.2.pdf
of funds should be not less than 85 percent of the funds allocated to the eligible agency as noted on Line 1.

h. Line 8: The percent and amount, if any, of funds to be reserved and made available to eligible recipients under section 112(c) of Perkins V. The percent of funds should be not more than 15 percent of the 85 percent of funds noted on Line 7.

i. Line 9: The percent and amount, if any, of funds to be reserved and made available to secondary recipients under section 112(c) of Perkins V.

j. Line 10: The percentage and amount, if any, of funds to be reserved and made available to postsecondary recipients under section 112(c) of Perkins V.

k. Line 11: The percent and amount of funds to be made available to eligible recipients under section 112(a)(1) of Perkins V. The percent and amount of funds should represent the funds remaining after subtracting any reserve as noted on Line 8.

l. Line 12: The percent and amount of funds to be distributed to secondary recipients under the allocation formula described in section 131 of Perkins V.

m. Line 13: The percent and amount of funds to be distributed to postsecondary recipients under the allocation formula described in section 132 of Perkins V.

n. Line 14: The amount of funds to be made available for the State administration match requirement under section 112(b) of Perkins. The amount of funds shall be provided from non-Federal sources and on a dollar-for-dollar basis.
### B. Budget Form

**State Name:** Pennsylvania  
**Fiscal Year (FY):** 2020-2021

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<th>Line Number</th>
<th>Budget Item</th>
<th>Percent of Funds</th>
<th>Amount of Funds</th>
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<td>2</td>
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<td>3</td>
<td>State Leadership</td>
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<td>4</td>
<td>Individuals in State Institutions</td>
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<td>Correctional Institutions</td>
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<tr>
<td>4b</td>
<td>Juvenile Justice Facilities</td>
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</tr>
<tr>
<td>4c</td>
<td>Institutions that Serve Individuals with Disabilities</td>
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<td>Non-traditional Training and Employment</td>
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<tr>
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<tr>
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<td>Secondary Recipients</td>
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<td>Postsecondary Recipients</td>
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<td>14</td>
<td>State Match <em>(from non-federal funds)</em></td>
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V. State Determined Performance Levels (SDPL)

A. Instructions

1. On the form in Item V.B below, provide State determined performance levels (SDPLs), covering FY 2020-23, for each of the secondary and postsecondary core indicators of performance for all CTE concentrators in the State described in section 113(b) of Perkins V (see Table 6). In preparing your SDPLs, refer to your narrative descriptions in Section II.D of this guide.

2. In completing the SDPL form, provide:
   a. Column 2: Baseline level.
   b. Columns 3-6: State determined levels of performance for each year covered by the State plan, beginning for FY 2020, expressed in percentage or numeric form and that meets the requirements of section 113(b)(3)(A)(III) of Perkins V. See Text Box 8 for the statutory requirements for setting State determined levels of performance under section 113(b)(3)(A)(iii) of Perkins V.

2. Revise, as applicable, the State determined levels of performance for any of the core indicators of performance—
   a. Prior to the third program year covered by the State plan for the subsequent program years covered by the State plan pursuant to section 113(b)(3)(A)(ii); and/or
   b. Should unanticipated circumstances arise in a State or changes occur related to improvement in data or measurement approaches pursuant to section 113(b)(3)(A)(iii).

Please note that, pursuant to section 123(a)(5) of Perkins V, an eligible agency may not adjust performance levels for any core indicators that are subject to, and while executing, an improvement plan pursuant to section 123(a) of Perkins V.
Table 4: Section 113(b) Core Indicators of Performance

<table>
<thead>
<tr>
<th>Indicator Descriptions</th>
<th>Indicator Codes</th>
<th>Indicator Names</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of CTE concentrators who graduate high school, as measured by the four-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).</td>
<td>1S1</td>
<td>Four-Year Graduation Rate</td>
</tr>
<tr>
<td>Percentage of CTE concentrators who graduate high school, as measured by extended-year adjusted cohort graduation rate defined in such section 8101.</td>
<td>1S2</td>
<td>Extended Graduation Rate</td>
</tr>
<tr>
<td>CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the Elementary and Secondary Education Act (ESEA) of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act.</td>
<td>2S1</td>
<td>Academic Proficiency in Reading/Language Arts</td>
</tr>
<tr>
<td>CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the ESEA of 1965, as measured by the academic assessments in mathematics as described in section 1111(b)(2) of such Act.</td>
<td>2S2</td>
<td>Academic Proficiency in Mathematics</td>
</tr>
<tr>
<td>CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the ESEA of 1965, as measured by the academic assessments in science as described in section 1111(b)(2) of such Act.</td>
<td>2S3</td>
<td>Academic Proficiency in Science</td>
</tr>
<tr>
<td>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.</td>
<td>3S1</td>
<td>Post-Program Placement</td>
</tr>
</tbody>
</table>
Table 4: Section 113(b) Core Indicators of Performance (continued)

<table>
<thead>
<tr>
<th>Indicator Descriptions</th>
<th>Indicator Codes</th>
<th>Indicator Names</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.</td>
<td>4S1</td>
<td>Non-traditional Program Concentration</td>
</tr>
<tr>
<td><strong>The eligible agency must include at least one program quality indicator—5S1, 5S2, or 5S3—and may include any other quality measure(s) that are statewide, valid, reliable, and comparable across the State.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.</td>
<td>5S1</td>
<td>Program Quality – Attained Recognized Postsecondary Credential</td>
</tr>
<tr>
<td>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</td>
<td>5S2</td>
<td>Program Quality – Attained Postsecondary Credits</td>
</tr>
<tr>
<td>Percentage of CTE concentrators graduating from high school having participated in work-based learning.</td>
<td>5S3</td>
<td>Program Quality – Participated in Work-Based Learning</td>
</tr>
<tr>
<td>Percentage of graduating CTE concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Specific Assessments or achieve competency on other PDE approved test in the reporting year.</td>
<td>5S4</td>
<td>Program Quality – Technical Skill Attainment</td>
</tr>
</tbody>
</table>

March 2020
Table 4: Section 113(b) Core Indicators of Performance (continued)

<table>
<thead>
<tr>
<th>Indicator Descriptions</th>
<th>Indicator Codes</th>
<th>Indicator Names</th>
</tr>
</thead>
<tbody>
<tr>
<td>Postsecondary Level</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentage 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.</td>
<td>1P1</td>
<td>Post-Program Placement</td>
</tr>
<tr>
<td>Percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion.</td>
<td>2P1</td>
<td>Earned Recognized Postsecondary Credential</td>
</tr>
<tr>
<td>Percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.</td>
<td>3P1</td>
<td>Non-traditional Program Concentration</td>
</tr>
</tbody>
</table>

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12 This means that a student gets counted under this indicator whether the student obtains the credential during participation or within 1 year of completion. The Department interprets “within 1 year of completion” to have the plain meaning of those words: that the student would be counted if the student obtains the credential in the 1 year following that student’s completion of the program.

13 This means that a student gets counted under this indicator if individuals from their gender comprise less than 25 percent of the individuals employed in the related occupation or field of work.

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### B. State Determined Performance Levels (SDPL) Form

**State Name:** Pennsylvania

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
<th>Column 6</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Baseline Level</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Performance Levels</strong></td>
<td>FY 2020</td>
<td>FY 2021</td>
<td>FY 2022</td>
<td>FY 2023</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Secondary Indicators</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1S1: Four-Year Graduation Rate</td>
<td>92.19</td>
<td>92.55</td>
<td>92.91</td>
<td>93.27</td>
<td>93.63</td>
<td></td>
</tr>
<tr>
<td>1S2: Extended Graduation Rate</td>
<td>94.39</td>
<td>94.65</td>
<td>94.91</td>
<td>95.17</td>
<td>95.43</td>
<td></td>
</tr>
<tr>
<td>2S1: Academic Proficiency in Reading Language Arts</td>
<td>50.8</td>
<td>53.04</td>
<td>55.28</td>
<td>57.52</td>
<td>59.76</td>
<td></td>
</tr>
<tr>
<td>2S2: Academic Proficiency in Mathematics</td>
<td>41.8</td>
<td>44.45</td>
<td>47.10</td>
<td>49.75</td>
<td>52.40</td>
<td></td>
</tr>
<tr>
<td>2S3: Academic Proficiency in Science</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>3S1: Post-Program Placement</td>
<td>92.48</td>
<td>92.82</td>
<td>93.16</td>
<td>93.50</td>
<td>93.84</td>
<td></td>
</tr>
<tr>
<td>4S1: Non-traditional Program Concentration</td>
<td>15.49</td>
<td>15.92</td>
<td>16.35</td>
<td>16.78</td>
<td>17.21</td>
<td></td>
</tr>
<tr>
<td>5S1: Program Quality – Attained Recognized Postsecondary Credential</td>
<td>65.56</td>
<td>67.13</td>
<td>68.70</td>
<td>70.27</td>
<td>71.84</td>
<td></td>
</tr>
<tr>
<td>5S2: Program Quality – Attained Postsecondary Credits</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>5S3: Program Quality – Participated in Work-Based Learning</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>5S4: Program Quality – Other Technical Skill Attainment</td>
<td>84.27</td>
<td>84.99</td>
<td>85.71</td>
<td>86.43</td>
<td>87.15</td>
<td></td>
</tr>
</tbody>
</table>

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14 The Perkins V State Plan Portal will allow an eligible agency to include on this form as many “other” program quality indicators as they choose.

March 2020
<table>
<thead>
<tr>
<th>Indicators</th>
<th>Baseline Level</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>1P1: Post-Program Placement</td>
<td>93.11</td>
<td>93.42</td>
<td>93.73</td>
<td>94.04</td>
<td>94.35</td>
</tr>
<tr>
<td>2P1: Earned Recognized Postsecondary Credential</td>
<td>90.20</td>
<td>90.65</td>
<td>91.10</td>
<td>91.55</td>
<td>92.00</td>
</tr>
<tr>
<td>3P1: Non-traditional Program Concentration</td>
<td>21.66</td>
<td>21.81</td>
<td>21.96</td>
<td>22.11</td>
<td>22.26</td>
</tr>
</tbody>
</table>
VI. Appendices

Appendix A

Public Comment from Public Hearings
Summary of Views and Recommendations Received During Public Hearings held
October 15, 16, and 17, 2019 as authorized by Section 122(a)(3) of Perkins V.

Below is a summary of the written and oral comments received by PDE at regional hearings that
provided all segments of the public and interested organizations an opportunity to present views
and make recommendations regarding the Perkins V State Plan.

The written materials from the public and/or interested organizations below were received as
testimony in conjunction with the public hearing and were referenced or summarized by the
speakers during oral comments. Two attendees, Cumberland Perry AVTS and Westmoreland
CTC did not provide testimony:

- Chester County IU/Chester County Technical HS
- Career and Technology Center of Lackawanna County
- Community College of Allegheny County
- Cumberland Perry AVTS
- Delaware County Technical School
- Dover Area School District
- Johnson College
- Lehigh Carbon Community College
- Lycoming CTC
- Octorara Area School District
- Penn Highlands Community College
- Universal Audenried High School
- Westmoreland CTC

The following summary of comments, inclusive of view and recommendations, were provided,
with Department response offered to provide further explanation regarding the comments:

A. Public Hearing: October 15, 2019

Chester County IU and Chester County Technical College HS:

Comment: “Program of Study Statewide Task Lists which set the standard for the statewide articulation system are valuable not only for that fact, but to also negotiate local articulated systems, create dual enrollment agreements, and to inform the public of the rigor of CT programs. Their continued use and revision are an extremely valuable to create college credit opportunities.”

Response: The Department agrees and will continue to use the statewide articulation system.

Comment: “Dual enrollment credits are reportable to PIMS for use in the Future Ready PA Index. Districts across Chester County are very different in how they support these credits. Some districts provide students with the opportunity to earn college credits in high school and permit those credits to replace required courses for high school graduation. Some districts do
not allow this. With the cost of college tuition today, students who are taking the credits in high school are saving not just time but also tuition dollars.”

Response: The Department supports local authority and will continue to collect data on dual enrollment.

Comment: “When students earn dual enrollment credits for technical courses, the courses should be valued the same way as dual enrollment courses for general education/academic credits. PDE needs to recognize the value of technical dual enrollment credits and weigh them the same as general education dual enrollment credits.”

Response: The Department will examine the dual enrollment data collection and reporting in Future Ready PA Index.

Delaware County Technical School:

Comment: “Perkins funding is an essential component of CTE programs at the secondary level. Funding for CTE programs allows students to explore career pathways to be better informed for the working world or post-secondary opportunities and serves on the front line of training the future labor force for America.”

Response: The Department agrees.

Octorora School District

Comment: “Provide the process to access funding for CTE programs.”

Response: The Department process for applying for a Perkins V grant is outlined in the state plan in Appendix B.

Universal Audenried High School:

Comment: “The new Perkins V plan offers a great opportunity for my school in that we are a 98% free and reduced price lunch and serve many students who are homeless, parents as well as coming from homes that struggle with the many issues that challenge inner city communities.

The largest challenge we will face is the mandatory attendance of individuals for the comprehensive needs' assessment. While it is an excellent source of feedback to empower our partners and engage the community, we have many parents, students and community partners who struggle with attendance. Is it possible to hold the comprehensive needs assessment meeting more than once in order to compile the data in order to improve our programming?”

Response: The regulation requires who should serve on the stakeholder’s group and exemptions are not permitted.

B. Public Hearing: October 16, 2019

Career and Technology Center of Lackawanna County:

Comment: “At the Perkins Regional Stakeholders meeting held April 10, 2019 at Bucks County Community College, there was a consensus among attendees that the total allocation for local
grants, there should be no change in the allocation of 70% to secondary and 30% to postsecondary. One of the major reasons is that a secondary institution is dependent on local school district funding while postsecondary institutions can raise tuition when necessary. The group also did not find it necessary to set aside reserve funds from competitive grants. The reasoning was that it would just add another layer to the already rigorous grant process, and most would not have the time, or the personnel to complete another grant application that the school level or the state level.

Response: The Department supports the stakeholders’ input, agrees, and has retained the 70/30 split.

Dover Area School District:

Comment: “Provide the process to access funding for CTE programs.”

Response: The Department process for applying for a Perkins V grant is outlined in the state plan in Appendix B.

Johnson College

Comment: “Please provide the justification for the 70 secondary/30 postsecondary split in allocation and why only SOAR students can benefit from the Perkins funds. The College would have to increase tuition in order to absorb the costs of the loss of Perkins funds. Students in the past have denied the SOAR credits because as hands on learners they want to take the classes. Local agreements benefit Johnson College as most students live in a 60-mile radius.”

Response: The State Plan outlines the justification for the 70/30 split in allocation. The State Plan allows for the statewide program of study and locally developed programs. The federal definition of program of study includes “integrate rigorous and challenging academic and career and technical instruction, and that link secondary education and postsecondary education for participating career and technical education students. If the program is articulated with a secondary program and meets the other requirements, students participating in the program of study are part of the reporting.

Lehigh Carbon Community College:

Comment: “Based on the comments presented at today’s meeting session, specifically the Program of Study and the Local Articulation information as guides for Perkins V funding – does that incorporate CTE programs (i.e., nursing, PTA ONA, Vet Tech) where POS nor local articulation agreement can’t be drafted because of restrictive admission requirements? Restrictive admission requirements that cannot be bypassed by an articulation agreement (SBOT?) How does Perkins V fund these CTE student programs?”

Response: The Department agrees and will recognize the local agreements developed between secondary and postsecondary partners.

C. Public Hearing: October 17, 2019

Community College of Allegheny County:
Comment: “The Community College of Allegheny County is opposed to discontinuing the current statewide articulation agreements known by the acronym SOAR (Students Occupationally and Academically Ready) that seamlessly link secondary and postsecondary Career and Technical Education, as it would discard extensive monetary and material efforts spent promoting SOAR, would incur additional costs at the local level, would disadvantage Rural CTCs or CTCs without access to a local partner, and would create a new and confusing patchwork system of local agreements from which no large-scale outcome or knowledge could be garnered.”

Response: The Department agrees.

Comment: “Postsecondary institutions do not have data on many of the Special Population categories outlined in Perkins V and will have to rely on incomplete or substitute data sets, because students have to self-disclose. If postsecondary institutions do not have access this information in full, they will underreport.”

Response: The Department recognizes the challenge.

Comment: “The Pennsylvania Bureau of Career and Technical Education has provided postsecondary schools with a list of 338 industry certifications that Postsecondary institutions will be required to track under Perkins V. Again, unless the students self-disclose that they have obtained these certificates, we will not be able to gather and report this data accurately.

Allowing students to use Perkins Grant funds for certifications is also problematic. Which certifications would we pay for and under what circumstances? How much of the budget should we devote to this endeavor? Doing this would still not guarantee that we would be able to gather complete and accurate data.”

Response: The Department recognizes the challenge.

Comment: “CCAC easily meets the definition of Size, Scope, and Quality. The complication with the definition is it could be easily interpreted to mean that Perkins Grant funds may be tied only to special needs students enrolled in programs with SOAR or local articulation agreements. CCAC is strongly opposed to this interpretation.”

Response: The Department has reviewed the definition to ensure interpretation is all students.

Lycoming Career and Technology Center:

Comment: “Data required for Perkins is already submitted by schools to PDE. PDE should put it in the format required by Perkins and give it back to the schools. Allow Perkins Planning Committees draw from a certain percentage of stakeholders rather than a required number of members to help rural schools. Lift restrictions on purchasing program-required tools and equipment. Include a measure of gainful employment post-graduation”

Response: The Department will review the guidance provided to recipients.

Penn Highlands CTC:

Comment: “Set realistic performance indicators, (e.g., 4P1, Placement Follow Up is set at an unattainable 98%). Don’t penalize institutions for not being able to gather data that is self-
reported by students, i.e. whether they belong to “special populations.” Find ways to use the data that institutions already report to lessen their reporting burden, (e.g. use what they report to regional accrediting agencies and PDE for Perkins)."

Response: The Department agrees and will work with stakeholders to establish the baseline.

Hamill Manufacturing Company:

Comment: “Hamill Manufacturing is a precision machining and fabricating company that supplies critical components used on submarines and aircraft carriers in the U.S. Navy fleet. We, like many other manufacturing companies here in western PA, are having a very difficult time finding employees to hire as beginner welders or machinists or apprentices, let alone fully qualified people. Over the years, our biggest supplier of entry level employees has been the local CTCs, i.e. Forbes Road, Central Eastern & Northern Westmoreland CTCs. It is imperative that their students be properly trained to the entry level basics at these facilities for local companies like us to pull from, to add to our workforce. We all know that the Perkins monies have played a major part in keeping these training facilities operating and supplying our needs. Therefore, we would hope that each CTC would continue receiving the support that they need.”

Response: The Department appreciates the support from Hamill Manufacturing Company.

Summary of General Input Received in Consultation with Stakeholders Following October 15, 16, and 17 2019 meetings as authorized in Section 122(c)(1)(A) of Perkins V

Below is a summary of written comments received by PDE based on consultation with stakeholders identified in Section 122(c)(1)(a) as part of the development of the state plan. The Department held a series of meetings with the stakeholders to discuss proposed decisions affecting groups involved or impacted by career and technical education. The following summary of comments were provided following the meetings, by the below participants, with Department response offered to provide further explanation regarding the comments:

Summary of General Input Received in Consultation with Stakeholders During State and Regional Stakeholders’ Meetings March 19, and April 9, 10 and 11, 2019.

- Commission for Agriculture Education Excellence
- Franklin County CTC
- Hamill Manufacturing Company
- Pennsylvania Partnerships for Children
- Pennsylvania Statewide Afterschool Youth Development Network:

Commission for Agriculture Education Excellence

Comment: “The department should consider adoption of the AFNR standards for agricultural education program approval to replace the current system.”

Response: The Department recognizes all industry standards and requires all Department approved programs to align to the industry standards.

Franklin County CTC
Comment: “Nontraditional participation indicator relies on subjective factors which have proven difficult for recipients attempting to meet the required standard. Measure our efforts to attract non-traditional students. Our control of the situation cannot go beyond that.”

Response: Perkins V does not require nontraditional participation rate. The Department will not act on this comment.

Pennsylvania Partnerships for Children (PPC)

Comment: “PPC would like to see CTCs have access to the type of equipment students would be expected to use with employers upon graduation. PPC would like to see additional dollars allocated to programs for essential equipment purchases.”

Response: An additional $2 million dollars was added to the supplemental equipment line item for the 2019-2020 school year. An additional $7 million dollars was added to the CTE subsidy line item for the 2019-2020 school year. Legislative language ensures the CTE subsidy line item will be fully funded, removing the reduction factor language.

Comment: “CTE is not available to all students who want to attend because many school districts simply cannot afford to enroll all interested students in those programs. Because these methods differ so greatly between each school district, PPC would like to see guidance developed from PDE on a method to ensure students in each district are treated equitably when expressing interest in attending CTE related programming.”

Response: The Department will develop guidance on student access to career and technical education.

Pennsylvania Statewide Afterschool Youth Development Network:

Comment: “The law mentions the importance of employability skills in career development. “Afterschool programs are well-positioned to help teach these skills and have the flexibility, unlike the school day, to specifically address this need.”

Comment: “Perkins V expands eligible uses to allow for career exposure, exploration, and preparation, and permits use of funds as early as fifth grade. Partnering with afterschool programs who are already serving students in these grades will help expose youth to careers earlier and choose CTE pathways.”

Comment: “The law mentions partnerships with community-based partners (non-profits that connect students with opportunities). We encourage PDE to include partnering with PSAYDN and community-based afterschool programs in its state plan to cast a wider net in accessing and preparing underserved, underrepresented youth for career pathway opportunities through CTEs.”

Comment: “The law for the first time explicitly lists partnerships with community-based and youth-serving organizations as eligible uses of local funds. Using this funding to allow partnerships with afterschool programs can help bridge increased access to CTE programs as the successful SHINE-CCTI model does.”

March 2020
Response to all comments: The items requested are required uses of funds. Each local recipient can decide how to utilize funds in order to address the results of their comprehensive local needs assessment.
Appendix B
Perkins Secondary Local Application

Comprehensive Local Needs Assessment

This section will have three parts of the Comprehensive Local Needs Assessment (CLNA) to rollover into the local application. The elements in this section are view only, only after approved.

1. Stakeholders Section- List of participants. (Table with dropdown column)
2. Size, Scope and Quality Section- Table indicating in process or compliant. (Table/Questions)
3. Equity and Access Section- The progress that has been made toward implementation of equal access to high quality CTE programs of study for all students. (Table/Questions)

Standard Narrative

1. Describe the results of the comprehensive needs assessment. (Text Box 3300 characters)
2. Provide a list of the career and technical education program offerings and activities that the eligible recipient will provide with Perkins V funds, which is informed by the results of the comprehensive needs assessment (Text Box 3300 characters)
3. Describe how the results of the comprehensive needs assessment informed the selection of the specific career and technical education programs and activities to be funded. (Text Box 3300 characters)
4. Describe new programs of study that will be developed and submitted to the State for approval. (Text Box 3300 characters)
5. Describe how students, including students who are members of special populations, will learn about career and technical education course offerings and whether each course is part of a career and technical education program of study. Describe how the eligible recipient, in collaboration with local workforce development boards and other local workforce agencies, one-stop delivery systems, and other partners, will provide each of the following: (Label)
   a. Career exploration and career development coursework, activities, or services. (Text Box 3300 characters)
   b. Career information on employment opportunities that incorporate the most up-to-date information on high-skill, high-wage, or in-demand industry sectors or occupations, as determined by the comprehensive needs assessment. (Text Box 3300 characters)
   c. An organized system of career guidance and academic counseling to students before enrolling and while participating in a CTE program. (Text Box 3300 characters)
6. Describe how the eligible recipient will improve the academic and technical skills of students participating in CTE programs by strengthening the academic and career and technical education components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE programs to ensure learning in the subjects that constitute a well-rounded education. (Text Box 3300 characters)

7. Describe how the eligible recipient will meet the following requirements: (Label)
   a. Provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency. (Text Box 3300 characters)
   b. Prepare CTE participants for non-traditional fields. (Text Box 3300 characters)
   c. Provide equal access for special populations to CTE courses, programs, and programs of study. (Text Box 3300 characters)
   d. Ensure that members of special populations will not be discriminated against based on their status as members of special populations. (Text Box 3300 characters)

8. Describe the work-based learning opportunities the eligible recipient will provide to students participating in CTE programs and how the recipient will work with representatives from employers to develop or expand work-based learning opportunities for CTE students. (Text Box 3300 characters)

9. Describe how the eligible recipient will provide students participating in CTE programs with the opportunity to gain postsecondary credit while still attending high school, such as through dual or concurrent enrollment programs or early college high school. (Text Box 3300 characters)

10. Describe how the eligible recipient will coordinate with the Pennsylvania and institutions of higher education to support the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable State certification and licensure requirements (including any requirements met through alternative routes to certification), including individuals from groups underrepresented in the teaching profession. (Text Box 3300 characters)

11. Describe how the eligible recipient will address disparities or gaps in performance, as described in section 113(b)(3)(C)(ii)(II), in each of the plan years. If no meaningful progress has been achieved prior to the third program year, describe the additional actions that will be taken to eliminate those disparities or gaps. (Text Box 3300 characters)

12. Describe how the eligible recipient will use funds to develop and implement evaluations of the activities carried out with Perkins V funds, including evaluations necessary to complete the comprehensive needs assessment and the local report. (Text Box 3300 characters)

Local Negotiation
Pennsylvania is conducting negotiations with local eligible recipients on levels of performance for the secondary core indicators. The negotiations will be based on State-determined baseline data provided by PDE. (Table)

Click link below to view the “Expected Consortium Performance.”

Secondary Performance Level

Secondary Performance Indicators (only)

<table>
<thead>
<tr>
<th>Indicators</th>
<th>1S1 Four-Year Graduation Rate</th>
<th>1S2 Extended Graduation Rate</th>
<th>2S1 Academic Proficiency in Reading Language Arts</th>
<th>2S2 Academic Proficiency in Mathematics</th>
<th>2S3 Academic Proficiency in Science</th>
<th>3S1 Post-Program Placement</th>
<th>4S1 Non-Traditional Program Concentration</th>
<th>5S1 Program Quality-Attained Postsecondary Credential</th>
<th>5S2 Technical Skill Attainment</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Baseline</td>
<td></td>
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</tbody>
</table>

Requirements for Uses of Funds

Funds made available to eligible recipients under this part shall be used to develop, coordinate, implement, or improve CTE programs to meet the needs identified in the comprehensive needs assessment and shall be used to support career and technical education programs that are of sufficient size, scope, and quality to be effective. (Label)

This section does not have to equal total allocation. Indicate dollar amount and funding source for all six (6) Required Use of Funds. Each funding source must be a separate line item. The list provided is the short version of the six (6) Required Uses of Funds as they appear in the dropdown box. A detailed description of all six “Required Uses of Funds” is available in the Perkins V guidelines. (Label)

Identify all funding sources that address any of the six (6) Required Uses of Funds in Perkins V, per Section 135(b).

Required Uses of Funds:

1. Career exploration and career development
2. Professional development
3. High-skill, high-wage, or in-demand occupations
4. Integration of academic skills
5. Programs that result in increasing student achievement of the local performance levels
6. Evaluation necessary to complete the comprehensive needs assessment and the local report

<table>
<thead>
<tr>
<th>Required Uses of Funds (dropdown)</th>
<th>Percentage of Perkins Funding (1-100)</th>
<th>Funding Source(s)</th>
<th>Amount (numeric)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Select from dropdown list</td>
<td>Numeric (1-100)</td>
<td>Text</td>
<td>Numeric (1-10000)</td>
</tr>
</tbody>
</table>

**Action Plan**

Select from the dropdown box in the first column the “Performance Indicator” that is not meeting the State baseline. Select all that apply (one at a time). **Note:** Remember when completing the Activity Table to click the “Add” button on the right when each row is complete. At least one activity must be created for each objective. (Label)

Objectives/Select from Dropdown.

**Secondary Performance Indicators (Dropdown):**

1. 1S1: Four-Year Graduation Rate
2. 1S2: Extended Graduation Rate
3. 2S1: Academic Proficiency in Reading Language Arts
4. 2S2: Academic Proficiency in Mathematics
5. 2S3: Academic Proficiency in Science
6. 3S1: Post-Program Placement
7. 4S1: Non-Traditional Program Concentration
8. 5S1: Program Quality – Attained Recognized Postsecondary Credential
9. 5S2: Skill Attainment
Activity Table

<table>
<thead>
<tr>
<th>Objective (dropdown with performance indicators)</th>
<th>Activity (text or numeric)</th>
<th>Location/Site (text)</th>
<th>Funds Amount (numeric/dollar amount) formula</th>
<th>Timeline (numeric/date)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
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<td></td>
<td>Grant Total:</td>
<td></td>
</tr>
</tbody>
</table>

Risk Assessment

The State must conduct a risk assessment during the pre-award process to evaluate an applicant's ability to execute the program for which they are applying, and may assign specific additional conditions within the grant award to develop the applicant’s ability to deliver and/or administer the grant program. Risk factors that will be considered include, but are not limited to, the following: previous non-compliance; any major issues; correction of previous findings; new personnel; substantial system changes (e.g., grant accounting system); new grant recipient; and results of any federal monitoring with specific conditions required. (Label)

Risk Assessment is a process to identify potential problems that could lead to risks in the accountability, fiscal accounting, and grant operation. (Label)

The following questions will assist with the evaluation of the applicant’s risk level for the future pre-award process. (Label)

1. Is there a new Director/Superintendent in the past three-years? (Select No/Yes)
2. If so, provide contact information for Director/Superintendent. (Text Box 300 characters)
3. Is there a new Business/Fiscal Manager in the past three-years? (Select No/Yes)
4. If so, provide contact information for Business/Fiscal Manager. (Text Box 300 characters)
5. Is there a new Perkins Administrator in the past three-years? (Select No/Yes)
6. If so, provide contact information for Perkins Administrator. Indicate number months or years as a Perkins Administrator in Pennsylvania. (Text Box 400 characters)
7. Were there any Perkins’ corrective actions in 2019-2020 fiscal year? (Select No/Yes)
8. If so, describe how all corrections identified in previous Perkins On-Site Compliance Reports have been completely satisfied and fully implemented. If they have not been corrected, provide a detailed explanation. If you have not received an on-site visit within the last two years, enter N/A. (Text Box 1000 characters)
9. Were there any Single Audit findings in 2019-2020? (Select No/Yes)
10. If so, have the findings and corrective actions been corrected? If not, identify the finding and provide a detailed explanation as to why it has not been corrected. (Text Box 1000 characters)

**Budget Detail**

Same as previous years

Will include 9 sections:

1. Salaries
2. Benefits
3. Purchased Professional and Technical Services
4. Purchased Property Services
5. Other Purchased Services
6. Supplies
7. Equipment
8. Indirect Cost
9. Budget Summary (view only)
Appendix C

Perkins Postsecondary Local Application

Comprehensive Local Needs Assessment

This section will have three parts of the Comprehensive Local Needs Assessment (CLNA) to rollover into Local Application. The elements in this section are view only, only after approved.

1. Stakeholders Section – List of participants. (Table with dropdown column)

2. Size, Scope and Quality Section – Table indicating in process or compliant. (Table/Questions)

3. Equity and Access Section – The progress that has been made toward implementation of equal access to high quality CTE programs of study for all students. (Table/Questions)

Standard Narrative

1. Describe the results of the comprehensive needs assessment. (Text Box 3300 characters)

2. Provide a list of the career and technical education program offerings and activities that the eligible recipient will provide with Perkins V funds, which is informed by the results of the comprehensive needs assessment (Text Box 3300 characters)

3. Describe how the results of the comprehensive needs assessment informed the selection of the specific career and technical education programs and activities to be funded. (Text Box 3300 characters)

4. Describe new programs of study that will be developed and submitted to the State for approval. (Text Box 3300 characters)

5. Describe how students, including students who are members of special populations, will learn about career and technical education course offerings and whether each course is part of a career and technical education program of study. Describe how the eligible recipient, in collaboration with local workforce development boards and other local workforce agencies, one-stop delivery systems, and other partners, will provide each of the following: (Label)

   a. Career exploration and career development coursework, activities, or services. (Text Box 3300 characters)

   b. Career information on employment opportunities that incorporate the most up-to-date information on high-skill, high-wage, or in-demand industry sectors or occupations, as determined by the comprehensive needs assessment. (Text Box 3300 characters)

   c. An organized system of career guidance and academic counseling to students before enrolling and while participating in a CTE program. (Text Box 3300 characters)
6. Describe how the eligible recipient will improve the academic and technical skills of students participating in CTE programs by strengthening the academic and career and technical education components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE programs to ensure learning in the subjects that constitute a well-rounded education. (Text Box 3300 characters)

7. Describe how the eligible recipient will meet the following requirements: (Label)
   a. Provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency. (Text Box 3300 characters)
   b. Prepare CTE participants for non-traditional fields. (Text Box 3300 characters)
   c. Provide equal access for special populations to CTE courses, programs, and programs of study. (Text Box 3300 characters)
   d. Ensure that members of special populations will not be discriminated against based on their status as members of special populations. (Text Box 3300 characters)

8. Describe the work-based learning opportunities the eligible recipient will provide to students participating in CTE programs and how the recipient will work with representatives from employers to develop or expand work-based learning opportunities for CTE students. (Text Box 3300 characters)

9. Describe how the eligible recipient will provide students participating in CTE programs with the opportunity to gain postsecondary credit while still attending high school, such as through dual or concurrent enrollment programs or early college high school. (Text Box 3300 characters)

10. Describe how the eligible recipient will coordinate with the Pennsylvania and institutions of higher education to support the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable State certification and licensure requirements (including any requirements met through alternative routes to certification), including individuals from groups underrepresented in the teaching profession. (Text Box 3300 characters)

11. Describe how the eligible recipient will address disparities or gaps in performance, as described in section 113(b)(3)(C)(ii)(II), in each of the plan years. If no meaningful progress has been achieved prior to the third program year, describe the additional actions that will be taken to eliminate those disparities or gaps. (Text Box 3300 characters)

12. Describe how the eligible recipient will use funds to develop and implement evaluations of the activities carried out with Perkins V funds, including evaluations necessary to complete the comprehensive needs assessment and the local report. (Text Box 3300 characters)

Local Negotiation
Pennsylvania is conducting negotiations with local eligible recipients on levels of performance for the postsecondary core indicators. The negotiations will be based on State-determined baseline data provided by PDE. (Table)

Postsecondary Performance Indicators (only)

Click link below to view the “Expected Consortium Performance.”

Postsecondary Performance Level

<table>
<thead>
<tr>
<th>Indicators</th>
<th>1P1 Post-Program Placement</th>
<th>2P1 Earned Recognized Postsecondary Credential</th>
<th>3P1 Non-Traditional Program Concentration</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Baseline</td>
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<td>Year 1</td>
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<tr>
<td>Year 2</td>
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</tr>
</tbody>
</table>

Requirements for Uses of Funds

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Identify all funding sources that address any of the six (6) Required Uses of Funds in Perkins V, per Section 135(b).

Required Uses of Funds:

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2. Professional development
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4. Integration of academic skills
5. Programs that result in increasing student achievement of the local performance levels
6. Evaluation necessary to complete the comprehensive needs assessment and the local
Action Plan

Select from the dropdown box in the first column the “Performance Indicator” that is not meeting the State baseline. Select all that apply (one at a time). **Note:** Remember when completing the Activity Table to click the “Add” button on the right when each row is complete. At least one activity must be created for each objective. (Label)

Objectives/Select from Dropdown.

**Postsecondary Performance Indicators (Dropdown):**

1. 1P1: Post-Program Placement
2. 2P1: Earned Recognized Postsecondary Credential
3. 3P1: Non-Traditional Program Concentration

Activity Table

<table>
<thead>
<tr>
<th>Objective (dropdown with performance indicators)</th>
<th>Activity (text or numeric)</th>
<th>Location/Site (text)</th>
<th>Funds Amount (numeric/dollar amount) formula</th>
<th>Timeline (numeric/date)</th>
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</tbody>
</table>

Total Amount:

Grant Total:

Risk Assessment

The State must conduct a risk assessment during the pre-award process to evaluate an applicant's ability to execute the program for which they are applying, and may assign specific additional conditions within the grant award to develop the applicant's ability to deliver and/or administer the grant program. Risk factors that will be consider include, but are not limited to, the following: previous non-compliance; any major issues; correction of previous findings; new personnel; substantial system changes (e.g., grant accounting system); new grant recipient; and results of any federal monitoring with specific conditions required. (Label)
Risk Assessment is a process to identify potential problems that could lead to risks in the accountability, fiscal accounting, and grant operation.

The following questions will assist with the evaluation of the applicant’s risk level for the future pre-award process:

1. Is there a new President in the past three-years? (Select No/Yes)
2. If so, provide contact information for President. (Text Box 300 characters)
3. Is there a new Business/Fiscal Manager in the past three-years (Select No/Yes)
4. If so, provide contact information for Business/Fiscal Manager. (Text Box 300 characters)
5. Is there a new Perkins Administrator in the past three-years? (Select No/Yes)
6. If so, provide contact information for Perkins Administrator. Indicate number months or years as a Perkins Administrator in Pennsylvania. (Text Box 400 characters)
7. Were there any Perkins’ corrective actions in 2019-2020 fiscal year? (Select No/Yes)
8. If so, describe how all corrections identified in previous Perkins On-Site Compliance Reports have been completely satisfied and fully implemented. If they have not been corrected, provide a detailed explanation. If you have not received an on-site visit within the last two years, enter N/A. (Text Box 1000 characters)
9. Were there any Single Audit findings in 2019-2020? (Select No/Yes)
10. If so, have the findings and corrective actions been corrected? If not, identify the finding and provide a detailed explanation as to why it has not been corrected. (Text Box 1000 characters)

**Program Approval**

Postsecondary recipients will enter program information in the electronic approval system (CATs-Career and Technical Education Information System) and provide information on each program that Perkins V funds will support. Each postsecondary program will be approved by the 2021-2022 program year.

If you have an approved program in CATs, please upload the sign assurance sheet below. (Label with upload document)

**WIOA**

Each federal Perkins postsecondary recipient will address the mandated support of the One-Stop Center infrastructure costs in their Local Plan application. Each recipient that uses federal Perkins funds for administrative purposes (indirect costs) must engage in local discussion with all Local Workforce Development Board within the region. (Label question)
1. Describe how the Perkins postsecondary institution works with the Workforce Development Board to support the One-Stop Center. (Maximum length is 1500 characters)

2. Describe the calculation used to determine proportionate use and benefit of a One-Stop Center. (Maximum length is 1500 characters)

3. Describe how the postsecondary institution supports infrastructure cost to the One-Stop Center. Note: The amount of administrative funds (indirect cost) used to support One-Stop Center infrastructure may not exceed the WIOA mandated 1.5% maximum. (Maximum length is 1500 characters)

4. What infrastructure costs are supported at the One-Stop Center using the federal Perkins administrative funds (indirect costs)? (Maximum length is 1500 characters)

5. Provide the details of the Memorandum of Understanding (MOU) with the One-Stop Center. A copy must be on file with postsecondary eligible recipient. (Maximum length is 1500 characters)

6. Check the box to confirm the Perkins Postsecondary President/Chief Executive Officer assures that the Perkins postsecondary recipient will comply with WIOA.

**Budget Detail**

Same as previous years

Will include 9 sections:

1. Salaries

2. Benefits

3. Purchased Professional and Technical Services

4. Purchased Property Services

5. Other Purchased Services

6. Supplies

7. Equipment

8. Indirect Cost

Budget Summary (view only)
Appendix D

Perkins V Comprehensive Needs Assessment

The Pennsylvania Department of Education has provided information on the new Comprehensive Local Needs Assessment (CLNA) requirement in Perkins V. The first workshop, December 13, 2018, highlighted that federal funds must be used to reduce performance gaps associated with each performance indicator. To assist with the analysis of the performance gaps, states are required to provide data by special populations categories for recipients to use with the stakeholders. The recipients are to conduct a local comprehensive needs assessment using the data. This new requirement closely aligns with ESSA and WIOA. During the March 2019, Perkins Regional Workshops, a Comprehensive Local Needs Assessment template was discussed along with the purpose of the CLNA.

The CLNA template has been developed and provides guiding questions and tables for each eligible agency to utilize at the required Stakeholders Meeting. The information gathered (similar to this document) will be entered in the eGrants system mid-January 2020.

What is a Comprehensive Local Needs Assessment and why is it so important?

A “need” is a discrepancy or gap between “what is” and “what should be.”

A Needs Assessment is a systematic set of procedures that are used to determine needs, examine their nature and causes, and set priorities for future action. They are conducted to determine the needs of people – i.e., receivers of the services provided by an organization. In education, the receivers of the services are students and their parents.

A Comprehensive Local Needs Assessment takes into account needs identified in other parts of a system. In education, the Comprehensive Needs Assessment determines the needs of those who receive the academic service (students), the providers of the academic services (school staff), and the structure and system of the organization (academic programs, assessment and evaluation, resources).

A Comprehensive Needs Assessment consists of the following steps:

1. Identify Planning Team (stakeholders).
2. Identify data sources (stakeholders engage in a review of focused data).
3. Analyze the data.
4. Identify areas of growth and strength (what is working).
5. Identify areas of need (what is not working).
6. Prioritize needs.

How often must the Comprehensive Local Needs Assessment be complete?

The Local Needs Assessment must be completed on a biennial basis with a review of progress during the odd year. The assessment (or review) must be completed prior to the completion of the grant application and must be uploaded each year in the Related Documents area of the grant application before grants can be approved.
1. Local Discussion (Subgroup Data Provided) Prompts:

   1. What data are trending positively over the last several years? Your strengths and improvement.
   
   2. What data are stagnated or trending negatively? Your challenges.
   
   3. Based on the performance indicators and student population data, what are our highest priority areas of focus? List in the table below.

Local CTE Program Summary Strengths/Improvements:

Challenges:

Proposed Strategies:

2. Describe progress that has been made toward implementation of equal access to high quality CTE programs of study for all students. [Perkins V Sec. 134 (c)(2)(E)] Help: Individual student groups counts by CIP. The low counts prevent PDE from sharing this data.

Question: What are doing to ensure equal access?

<table>
<thead>
<tr>
<th>Program CIP</th>
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<tr>
<td>Family</td>
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</tbody>
</table>

1. What strategies are helping students overcome barriers to learning that result in lower rates of access to, or performance gaps in, the programs for special populations?

2. What programs are designed to enable special populations to meet the local levels of performance?

3. What activities prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings* that will lead to self-sufficiency?
A setting that enables individuals with disabilities to interact with non-disabled persons to the fullest extent possible.

4. What activities will be implemented to ensure programs receiving Perkins funds will close the achievement gap?

3. Describe how the CTE programs offered in our CTCs/School Districts/Postsecondary Institutions are of sufficient in size, scope, and quality to meet the needs of all students. [Perkins V Sec. 134 (c)(2)(B)(i)]

<table>
<thead>
<tr>
<th>State SIZE, SCOPE and QUALITY Definitions</th>
<th>In-Progress</th>
<th>Compliant</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>SIZE Definition: Size is based on the number of programs of study available at the Perkins institution, not on enrollment in a specific CTE program. To be eligible for funding, a Perkins recipient must have at least three programs of study in not fewer than 3 different fields, each of which must serve a minimum of eight students. An eligible school also must have laboratories and classrooms that are readily accessible to all students, as well as a non-discriminatory admissions policy that is board approved and implemented.</td>
<td>In-Progress</td>
<td>Compliant</td>
<td>Notes</td>
</tr>
<tr>
<td>SCOPE Definition: The scope of a program is defined as a curriculum that covers all aspects of the industry and meets the criteria listed in the POS definition of Perkins V, including: (a) One secondary technical course per year is offered (definition of a courses</td>
<td>In-Progress</td>
<td>Compliant</td>
<td>Notes</td>
</tr>
</tbody>
</table>
is 240 technical instructional hours); (b) At minimum, 50% of the postsecondary credit meets the definition of career and technical education; (c) Secondary and postsecondary academic and technical content are aligned, leading to a sequence of courses that lead to a nonduplicative program offering; (d) Is inclusive of work-based learning; and (e) A credit transfer articulation agreement exists between the secondary CTE program and the corresponding postsecondary CTE program.

QUALITY Definition: Quality of secondary programs of study is based on the state regulations for approved programs. See Title 22 Education, Chapters 4 and 339. During the transition year, PDE will work with stakeholders to define high-quality postsecondary programs of study and to identify an approval process aligned to that definition.

Postsecondary quality will be defined by:

Review the postsecondary database where current
approved postsecondary programs are listed. Programs listed in the database demonstrates that the programs have been approved by the institutions Board of Trustees, accrediting authorities (national, regional or program specific [NAECP] accrediting authorities), and Pennsylvania Department of Education/State Board for Vocational Education.

Local Discussion Prompts:

1. How well are we meeting the state’s Size, Scope and Quality definitions?

2. In what ways can we improve?

4. Describe how the CTE programs offered in our CTCs/School Districts/Postsecondary Institutions are: [Perkins V Sec. 134 (c)(2)(B)(ii)]

Help: Capture workforce, salaries and where the jobs are locally. Use the GIS, OAC members and local business (Stakeholders’ group) to assist with gathering the data for this table. PDE will not provide this data.

   1. Aligned to State, regional or local in-demand industry sectors or occupations identified by the state workforce development board or local workforce development board, including career pathways.

   2. Designed to meet local education or economic needs not identified by state boards or local workforce development boards.

<table>
<thead>
<tr>
<th>CTE Program Name</th>
<th># of Enrolled (Most recent year)</th>
<th>High Wage/In-Demand Occupations (Local/Regional)</th>
<th># of Openings (Over last years)</th>
<th>High Wage/In-Demand Occupations (State)</th>
<th># of Openings (Most recent period)</th>
</tr>
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</tbody>
</table>
5. Evaluate progress toward the implementation of CTE programs and programs of study: [Perkins V Sec. 134 (c)(2)(C)] **Help:** In this table “Year 1” would be 2017-2018 fiscal year, “Year 2” 2018-2019, so on. Once table has been completed determine need with your Stakeholders’ Committee.

<table>
<thead>
<tr>
<th>CTE Program Name</th>
<th>Enrollment Trend</th>
<th>Concentrator Enrollment</th>
<th># Earning Dual Credits</th>
<th>Number of Certification/Credentials Earned</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year 1</td>
<td>Year 2</td>
<td>Year 3</td>
<td>Trend</td>
</tr>
</tbody>
</table>

Local CTE Program Summary Strengths/Improvement:

Challenges:

Proposed Strategies:

6. Describe progress being made to improve recruitment, retention, and training of CTE teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in these professions. [Perkins V Sec. 134 (c)(2)(D)] **Help:** Identify the diversity in the staff for the past three years. PDE will not provide this data.

<table>
<thead>
<tr>
<th>Individuals in groups underrepresented</th>
<th>Number Working in Local CTE Program(s)</th>
<th># Professional Development Workshops Offered</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year 1</td>
<td>Year 2</td>
</tr>
<tr>
<td>CTE teachers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Faculty</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Instructional Support</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Paraprofessionals</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Counselors</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Others</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Local CTE Staff Summary of Recruitment Efforts:

2. Local CTE Staff Summary of Retention Efforts:

7. Professional Development Offered/Participated:
<table>
<thead>
<tr>
<th>Title</th>
<th>Type (Workshop, Conference, Other)</th>
<th>Who Attended</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Brainstorm Form of Required Stakeholders for Local Comprehensive Needs Assessment Discussions [Perkins V Sec. 134(d)]**

In conducting the comprehensive needs assessment and developing the local application, the eligible recipient must involve a diverse body of stakeholders, including, at a minimum (the following):

<table>
<thead>
<tr>
<th>(1) Representatives of career and technical education programs in a local educational agency or educational service agency, including teachers, career guidance and academic counselors, principals and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals</th>
<th>Name</th>
<th>Organization/Title</th>
<th>Email/Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Teachers</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Counselors</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Principals/Admin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Support</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Personnel</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Paraprofessionals</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>(2) Representatives of career and technical education programs at postsecondary educational institutions, including faculty</th>
<th>Name</th>
<th>Organization/Title</th>
<th>Email/Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Postsecondary Faculty</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Postsecondary Admin</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
and administrators

<table>
<thead>
<tr>
<th>(3) Representatives of the state board or local workforce development boards and a range of local or regional businesses or industries</th>
<th>Workforce Board Reps</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Employers (Local)</td>
</tr>
<tr>
<td></td>
<td>Employers (Regional)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>(4) Parents and students</th>
<th>Parents</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Students</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>(5) Representatives of special populations</th>
<th>Special Pop Reps</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>(6) Representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at-risk youth (as defined in section 1432 of the Elementary and Secondary Education Act of 1965)</th>
<th>Out of School Youth Reps</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Homeless Youth Rep</td>
</tr>
<tr>
<td></td>
<td>At-Risk Youth Rep</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>(7) Representatives of Indian Tribes and Tribal organizations in the State, where applicable; and Others (Optional)</th>
<th></th>
</tr>
</thead>
</table>
Resources

Perkins V Special Populations Definition [Perkins V Sec. 3(48)]

Perkins V defines “special populations” as:

(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—

   a. is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and

   b. is on active duty (as such term is defined in section 101(d)(1) of such title.

Perkins V Core Indicators of Performance [Perkins V Sec. 113(b)]

Secondary Performance Indicators

1S1 – Four-Year Graduation Cohort Rate

Section 113 (b)(2)(A)(i)(I) The percentage of CTE concentrators who graduate high school, as measured by the four-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).

**Numerator:** Number of CTE concentrators who, graduated from high school, as measured by the four-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).

**Denominator:** Number of CTE concentrators who, in the reporting year, were included in the State’s computation of its graduation rate as defined in the State’s Consolidated Accountability Plan pursuant to Section 1111(b)(2) of the ESSA.

1S2 - Extended-Year Graduation Rate

Section 113 (b)(2)(A)(i)(II) (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 such section 8101.
Numerator: The number of CTE concentrators who graduated from high school, as measured by the extended-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).

Denominator: Number of CTE concentrators who, in the reporting year, were included in the State’s computation of its extended-year cohort graduation rate as defined in the State’s Consolidated Accountability Plan pursuant to Section 1111(b)(2) of the ESEA.

2S1 - Academic Proficiency in Reading/Language Arts
Section 113 (2)(A)(ii) CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(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.

Numerator: Number of CTE concentrators who achieved reading/language arts 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 described in section 1111(b)(2) of such Act; and whose scores were included in the computation of the State’s secondary education Academic Achievement indicator.

Denominator: Number of CTE concentrators who took the ESEA assessments in reading/language arts whose scores were included in the State’s computation of AYP.

2S2 - Academic Proficiency in Mathematics
Section 113 (2)(A)(ii) CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(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.

Numerator: Number of CTE concentrators who achieved mathematics 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 described in section 1111(b)(2) of such Act; and whose scores were included in the computation of the State’s secondary education Academic Achievement indicator.

Denominator: Number of CTE concentrators who took the ESEA assessments in mathematics whose scores were included in the State’s computation of AYP.

2S3 - Academic Proficiency in Science
Section 113 (2)(A)(ii) CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(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.

Numerator: Number of CTE concentrators who achieved science 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 described in section 1111(b)(2) of such Act; and whose scores were included in the computation of the State’s secondary education Academic Achievement indicator.
Denominator: Number of CTE concentrators who took the ESEA assessments in science whose scores were included in the State’s computation of AYP.

3S1 Post-Program Placement
Section 113 (b)(2)(A)(iii) 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.

Numerator: The number 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.

Denominator: The number of CTE concentrators who left secondary education during the reporting year.

4S1 Nontraditional Program Concentrators
Section 113 (a)(2)(A)(v) The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.

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.

Denominator: Number of CTE concentrators in a CTE program or program of study that leads to a nontraditional field, during the reporting year.

5S1 – Recognized Postsecondary Credential
Section 113 (b)(2)(A)(iv)(I)(aa) The percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.

Numerator: Number of CTE concentrators who graduated from high school having attained a recognized postsecondary credential.

Denominator: Number of CTE concentrators who graduated from high school.

5S4 - Technical Skill Attainment
Section 113 (b)(2)(A)(iv)(II) The percentage of CTE concentrators achieving on any other measure of student success in career and technical education that is statewide, valid, and reliable, and comparable across the State. Please identify.

Numerator: Number of graduating career and technical education concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Specific Assessments or achieve competency on other PDE approved tests in the reporting year.
**Denominator:** Number of graduating career and technical education concentrators who complete the NOCTI Job Ready Occupational Specific Assessments or other PDE approved tests in the reporting year.

**Postsecondary Performance Indicators**

**1P1 – Postsecondary Retention and Placement**

Section 113 (b)(2)(B)(i) The percentage of CTE concentrators who, in 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.

**Numerator:** 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.

**Denominator:** Number of CTE concentrators who completed their program in the reporting year.

**2P1 – Earned Recognized Postsecondary Credential**

Section 113 (b)(2)(B)(ii) The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion.*

*This means that a student gets counted under this indicator whether the student obtains the credential during participation or within 1 year of completion. The Department interprets “within 1 year of completion” to have the plain meaning of those words: that the student would be counted if the student obtains the credential in the 1 year following that student’s completion of the program.

29 USC 3102 WIOA Definitions Section (52) Recognized postsecondary credential. 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.

**Numerator:** Number of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion.

**Denominator:** Number of CTE concentrators who left postsecondary education in the prior reporting year.
3P1 – Nontraditional Program Concentration

Section 113 (b)(2)(B)(iii) The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.

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.

Denominator: Number of CTE concentrators in a CTE program or program of study that leads to a nontraditional field, during the reporting year.
Appendix E

Stakeholder Comment on State Determined Performance Levels and Response

Stakeholder comments on SDPLs were due December 27, 2019. The Department received comments from four stakeholders.

Rosedale Technical College

Comment: 1P1: Post-Program Placement meets the requirements of the law but does not support the improvement of performance of all concentrators nor does it support the needs of the local education and business community. Employment should be related to the field of study to qualify. Otherwise the training program isn’t achieving its goal. Then with the field of study condition, the numerical goals should be revised.

Response: The Department recognizes the value of the comment. Federal regulation does not require employment be related to the field of study. The regulation requires the “percentage 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.”

Comment: 2P1: Earned Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 3P1: Non-traditional Program Concentration meets the requirements of the law but does not support the improvement of performance of all concentrators nor supports the needs of the local education and business community. The “one size fits all” approach taken in the plan for 3P1 has zero value as an actionable metric. Expecting 21.66% female participation for Electricians is absurd, just as expecting 21.66% male nurses is way too easy. The plan for 3P1 is worthless and will do nothing to support the goals of the law.

Response: The Department is in communication with the US Department of Education to determine if alternative methodology would be acceptable while meeting the intent of the regulation.

AW Beattie Career Center

Comment: 1S1: Four-Year Graduation Rate does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 1S2: Extended Graduation Rate does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 2S1: Academic Proficiency in Reading Language Arts does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 2S2: Academic Proficiency in Mathematics does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 2S3: Academic Proficiency in Science does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 3S1: Post-Program Placement does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 4S1: Non-traditional Program Concentration does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 5S1: Program Quality – attained Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 5S4: Program Quality – Technical Skill Attainment does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 1P1: Post-Program Placement does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.
Comment: 2P1: Earned Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 3P1: Non-traditional Program Concentration does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Chester County Technical College High School

Comment: 1S1: Four-Year Graduation Rate does meet the requirements of the law and support the improvement of performance of all concentrators. It does not support the needs of the local education and business community. The PIMS reference guide states: EdNA classified Occupational CTCs do not receive a cohort graduation rate and the sending LEA must report this graduation/dropout information. Occupational CTCs data would be incomplete or nonexistent if the data is collected directly from the Occupational CTCs Student template. Likewise, if the sending school fails to report the information in their templates for a graduating Occupational CTC student, then the information could be incomplete or nonexistent.
Response: Graduate cohort data are federally defined and approved, and therefore, cannot change. The specific calculation is to match the 2017-18 CTE students with 480 or more cumulative hours to the four-year cohort graduate data.

Comment: 1S2: Extended Graduation Rate does meet the requirements of the law and supports the improvement of performance of all concentrators. It does not support the needs of the local education and business community. Continuing from 1S1, CTCs will have little impact on their own data and not be able to correct inaccurate information to ensure appropriate data is sent to the reporting agency.
Response: Graduate cohort data are federally defined and approved, and therefore, cannot change. The specific calculation is to match 2016-17 CTE students with 480 or more cumulative hours to the frozen cohort graduate data for extended year graduates.

Comment: 2S2: Academic Proficiency in Mathematics does meet the requirements of the law but does not support the improvement of performance of all concentrators or support the needs of the local education and business community. Considering when the student takes Algebra I, middle school or high school, the concentrator status does not match and therefore could significantly impact the performance indicator. CTE should not be responsible for tests before the students come to CTE: there is very little way to demonstrate growth.
Response: The best of 11th grade Keystone results have been federally approved for ESSA accountability reporting. The best of 11th grade results include remediation and retesting. The CTCs and sending districts should work together to ensure those students who are anticipated to reach CTE concentrator status have the opportunity to test, remediate, and retest. The calculation is a match of the 2018-19 CTE students with 480 or more cumulative hours to the 2018-19 Keystone/PASA Algebra best of 11th grade.
Comment: 2S3: Academic Proficiency in Science does meet the requirements of the law and supports the improvement of performance of all concentrators. It does not support the needs of the local education and business community. This Performance Indicator does not support the local education and business community since PA has chosen Biology as the content area for Science. This content area does not align with many CTE programs and therefore does not impact the career pathway to the business community. It is encouraged that the state consider an alternative test to measure proficiency in Science.

Response: The Department is communicating with US Department of Education regarding the use of this indicator.

Comment: 4S1: Non-traditional Program Concentration does meet the requirements of the law. It does not support the improvement of performance of all concentrators or the needs of the local education and business community. A concentrator is a measure of student retention, which is where the state has struggled the most historically to reach above 12% and maintain it as measured by Perkins IV 6S2 completion data. By assuming a baseline of 15.49%, the state will set itself up for deficiency in meeting the indicator. Additionally, the performance target increment is set at 10% which is significantly above the ACTE recommendation of .5% or 1%.

Response: Under Perkins IV, the Department performed at 16.86% for 6S1 Non-Traditional Participation and 13.64% on Non-Traditional Completion on the 2018 CAR. The Perkins V Concentration Non-Traditional indicator is between the Perkins IV Participation Non-Traditional indicator and Completion Non-Traditional indicator with a baseline of 15.49%. The proposed baseline for Perkins V is a state average and the incremental increase of 1.57%.

Comment: 5S1: Program Quality – Attained Recognized Postsecondary Credential does meet the requirements of the law. It does not support the improvement of performance of all concentrators or support the needs of the local education and business community. This is an incomplete record of student post-secondary achievement. CTE students successfully complete technical dual enrollment courses (in addition to dual credit) and the CTC should be recognized when secondary students earn a college transcript. A college transcript should be added to the list of recognized post-secondary credentials along with industry recognized certificates or certification, and a license recognized by the state involved or federal government.

Response: The Department uses the federal definition, which does not include completion of postsecondary courses. “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.”
Sandra Himes, Career and Technical Distinguished School Leader

Comment: 1S1: Four-Year Graduation Rate does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 1S2: Extended Graduation Rate does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 2S1: Academic Proficiency in Reading Language Arts does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
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Comment: 2S2: Academic Proficiency in Mathematics does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 2S3: Academic Proficiency in Science does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 3S1: Post-Program Placement does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 4S1: Non-traditional Program Concentration does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 5S1: Program Quality – attained Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.
Comment: 5S4: Program Quality – Technical Skill Attainment does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment: 1P1: Post-Program Placement does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
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Comment: 2P1: Earned Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.

Comment
3P1: Non-traditional Program Concentration does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.
Response: The Department recognizes the comment.