

Introducing the Comprehensive Local Needs Assessment

One of the most significant changes introduced in the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) is the new comprehensive local needs assessment (CLNA). Specifically, the law states: “*To be eligible to receive financial assistance under this part, an eligible recipient shall— (A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and (B) not less than once every 2 years, update such comprehensive local needs assessment.*” The CLNA was modeled after a similar requirement in the Every Student Succeeds Act (ESSA).

While the CLNA may appear to some to be simply an exercise in compliance, it brings an incredible opportunity to:

- Make certain that programs and programs of study are aligned to and validated by local workforce needs and economic priorities;
- Ensure that local Perkins eligible recipients are serving each learner equitably
- Enable eligible recipients to better direct resources towards programs and programs of study that lead to high-skill, high-wage and in-demand occupations and activities that address equity and opportunity gaps;
- Create a platform for coordinating and streamlining existing program review and school improvement processes to bring focus to strategic decisions;
- Provide a structured way to engage key stakeholders regularly around the quality and impact of local CTE programs and systems.

Given the lift of leading a CLNA – in particular a truly impactful, data-driven and inclusive CLNA that leads to system and program improvements – states have a clear role to play to support eligible recipients throughout the process. This is particularly true as local districts and institutions already have other needs assessment requirements from ESSA and other federal and state policies. The state should support locals by bringing clarity to the overall process; providing key data in compelling and actionable ways; and helping build capacity to design, execute and implement findings from the Perkins-required and other needs assessments.

At a minimum, as part of their state plan submission, states need to develop a template for the CLNA that identifies the required components of the law and articulates expectations for how the information will be collected, provided and used. States should work with eligible recipients when developing the template and related guidance as well as throughout the CLNA’s execution, to ensure the CLNA is not a series of check boxes, but a robust process that documents input from data, analysis and stakeholders. States must be poised to provide professional development and technical assistance as needed to help local eligible recipients conduct and implement findings from the CLNA.

What follows is a summary, analysis and guidance for each major component of the CLNA and the decisions states can be making now to support a robust CLNA process that aligns with the state’s overall vision for CTE, funding decisions and program/program of study approval and review.

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What Information Should Locals Collect

What Information Should Locals Collect: Student Performance Data

What does the law say?

The comprehensive local needs assessment will include an evaluation of the performance of the students served by the local eligible recipient with respect to State determined and local performance levels, including an evaluation of performance for special populations and each subgroup.

What does the law mean?

The comprehensive local needs assessment must contain an evaluation of CTE concentrators’ performance on the core performance indicators. While eligible recipients already are required to do this as part of their local plans under Perkins IV, the evaluation now must at a minimum include a performance analysis of the subgroups (as defined in ESSA) and the expanded list of special populations.

What is the State’s Role?

Whenever possible, the state should share state-collected, disaggregated data with local eligible recipients (in easy-to-read formats) to reduce the data collection burden and ensure more consistency. While eligible recipients are required to describe how they will address performance gaps in their local plan submissions under Perkins IV, Perkins V requires an expansion of current efforts, including new student populations and a deeper analysis of the root causes of any performance gaps. Given this expansion, states need to be providing as much data as possible so that eligible recipients can focus their time analyzing – rather than compiling – data.

The analysis of performance data disaggregated by special population will require better cooperation between CTE, ESSA and Workforce Innovation and Opportunity Act (WIOA) data, given that the special populations definition in Perkins V captures populations similar to those included in the definition of “subgroup” in ESSA and “individual with a barrier to employment” in WIOA. States should consider how to work with those in other agencies that manage data collection and analysis for ESSA and WIOA to ensure coordination, alignment and address challenges with transitioning or updating data systems. States will also need to determine how to address data access for eligible recipients that form consortia across secondary and postsecondary to receive Perkins funds (e.g., confidentiality requirements, data sharing agreements, etc.).

Finally, the state will need to provide guidance and likely professional development and technical assistance for eligible recipients in conducting this new analysis of special populations and subgroups, particularly around how to look at data to identify root causes in performance gaps.

What Information Should Locals Collect: Size, Scope & Quality

What does the law say?

The comprehensive local needs assessment will include a description of how CTE programs offered by the local eligible recipient are sufficient in size, scope, and quality to meet the needs of all students served by the eligible recipient.

What does the law mean?

The provision maintains the size, scope and quality requirements in Perkins IV, but instead requires that this description be addressed through the needs assessment (which is part of the local application in Perkins V) instead of in the local plan in Perkins IV. The state has the responsibility to establish the definition of these three requirements.

What is the State’s Role?

The state should review its current definitions of the size, scope and quality requirements (see below for descriptions of the three categories) to ensure they align with statewide goals and provide adequate guidance and flexibility to eligible recipients. Strengthening the definitions will help drive funds to quality, equitable and impactful programs that prepare learners for success.

Size

- The quantifiable evidence, physical parameters and limitations of each approved program (e.g., number of required programs or programs of study offered, required class size, availability of facilities and equipment, etc.) that relate to the ability of the program to address all student learning outcomes.
- Review this definition to make certain it aligns with the state's goals around quality, equity, access.

Scope

- The curricular expectations of each program and/or program of study (e.g., such as the ability of a curriculum to cover the full breadth of its subject, number of required courses in a sequence, early postsecondary opportunities for learners, role of advisory committees, etc.)
- Review to make certain your state requires the scope of CTE offerings necessary to meet learners' needs and reinforces high-quality expectations.

Quality

- The expected outcomes and impact of each program and/or program of study (e.g., ability of students to earn industry-recognized credentials, academic achievement, learner access to high-skill, high-wage and in-demand programs, etc.)
- This is potentially the most critical of the three definitions. A strong definition of quality will drive funds to programs that prepare students for current and future workforce needs and may help to transitions programs that are not meeting future needs.

What Information Should Locals Collect: Labor Market Alignment

What does the law say?
The comprehensive local needs assessment will include a description of how CTE programs offered by the eligible recipient are aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board or local workforce development board, including career pathways, where appropriate. The CLNA may also identify programs designed to meet local education or economic needs not identified by State boards or local workforce development boards.

What does the law mean?
The law requires an analysis of how CTE programs are meeting workforce needs, and provides eligible recipients with multiple ways to demonstrate labor market demand, from a combination of state and local sources.

What is the State’s Role?

If not already happening, the state should provide locals with direct access to state, regional and local labor market information (LMI). The eligible agency should work with the relevant workforce, Tribal and economic agencies to access and share the data, as well as coordinate collaboration between local workforce and economic boards with local Perkins recipients to access and analyze the data further. The state may require new cross-agency agreements to share data or to disaggregate data in alignment with local economic regions or education service areas. Perkins V amends the Wagner-Peyser Act to allow the eligible agency to access more LMI, which may help facilitate this process.

However, simply providing the LMI is only the first step. The state must ensure the data is understandable and anchored in meaningful definitions. States will need to review, and potentially enhance existing definitions of the terms “high-skill,” “high-wage” and “in-demand.” While state departments of labor or workforce development will usually have definitions in place for these three factors, they may not directly apply to CTE. The state may want to only support CTE programs that prepare learners for careers that address all three terms as a way to avoid supporting programs that only prepare for in-demand and often low-wage jobs. Similarly, the state should provide guidance or thresholds around the use of locally defined economic needs to ensure eligible recipients have the flexibility to support programs in emerging areas without significantly limiting learners’ post-program career options.

Finally, eligible recipients will need help analyzing and utilizing the data. For example, labor market information systems usually include quantitative data that measure and assess the size and characteristics of the labor market by industry,

including the demand for and supply of labor. Just reviewing a listing of current labor market information may not provide the depth of discovery needed to determine alignment. For example, careers in information technology and computer science are found in virtually every industry, but may not be identified as information technology careers – they may be listed in the manufacturing area because they are working in manufacturing. Input from business, industry and workforce and economic development partners during stakeholder engagement can augment this work.

What Information Should Locals Collect: Progress towards Implementing CTE Programs/Programs of Study

<p>What does the law say? The comprehensive local needs assessment will include an evaluation of progress toward the implementation of CTE programs and programs of study.</p>	<p>What does the law mean? This evaluation should be both a backward and forward-looking review of the programs and programs of study offered. In addition to meeting the size, scope and quality, this requirement addresses current and future plans to support the implementation of programs and programs of study.</p>
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What is the State’s Role?

To help in the development of this plan, the state should encourage eligible recipients to start by conducting a 3-5-year review of their CTE courses, programs and programs of study. Such a review might include:

- Analysis of current *program* offerings (including enrollment and retention over time, alignment to labor market demand, learner outcomes);
- Analysis of current *program of study* offerings (including enrollment and retention over time, alignment to labor market demand, learner outcomes, degree of secondary and postsecondary alignment);
- The role secondary or postsecondary partners currently play in program/program of study design and delivery;
- The role business and industry partners currently play in program/program of study development and delivery;
- Current and future workforce needs and economic priorities;
- Current efforts and future plans for addressing equity issues; and
- Current efforts and future plans for implementing or reviewing work-based learning, industry certifications, early postsecondary opportunities, and career development activities, including data on learner participation and success in such efforts.

Based on this analysis, eligible recipients should be able to identify where they are on and off track around the implementation CTE programs and programs of study that meet projected labor market needs, education, and economic priorities as well as offer all state requirements for program approval (and re-approval). This will be core to the local application.

If there are current elements of CTE program and program of study implementation that the state is particularly interested in or concerned about – such as transitions from secondary to postsecondary education or involvement of business and industry in CTE program design and delivery – they may want to identify some key questions eligible recipients need to address directly in this section.

What Information Should Locals Collect: Recruitment, Retention and Training of Faculty and Staff

What does the law say?

The comprehensive local needs assessment will include a description of how the eligible recipient will 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 such professions.

What does the law mean?

Eligible recipients must evaluate their current and future recruitment, retention and professional development needs. This may require root cause analyses of teacher or other professional shortages.

What is the State’s Role?

While some eligible recipients might be poised to lead this type of analysis, many may need support and guidance (and data) from the state. The state should provide guidance on the type of information locals need to collect on the recruitment, retention and training of CTE faculty and staff, in alignment with Perkins V’s formal definition of professional development. Specifically, states may want to signal to locals to:

- Conduct surveys of the identified populations to determine their professional development needs;
- Conduct focus groups to discuss professional development needs, strategies for retention and recruitment of professionals (which may occur during stakeholder engagement process);
- Analyze retention patterns of their faculty and staff from the previous 10 years;
- Project future faculty and staffing needs based on the analysis of progress towards implementing programs of study described above; and/or
- Develop strategies for recruitment and retention of underrepresented groups.

In addition, to help jumpstart the process, the state can conduct or share existing analyses of its CTE teacher, faculty and other related staff workforce and begin to collect and share best practices related to their recruitment, retention, and training. The state should also provide information on statewide efforts to recruit, prepare and support CTE professionals, including alternative certification pathways, paraprofessional licensure and statewide professional development opportunities.

Finally, the state can support locals, particularly at the secondary level, by tapping into state leaders who oversee Title II (Professional Development) under ESSA and developed any guidance or supports as local districts had to develop root causes analyses of teacher shortages, subgroup or special population learners disproportionately served by out-of-content area or otherwise underqualified educators, and other challenges with supporting a strong teacher pipeline.

What Information Should Locals Collect: Progress Towards Improving Access & Equity

What does the law say?

The comprehensive local needs assessment shall include a description of:

- Progress toward implementation of equal access to high-quality CTE courses and programs of study, for all students including strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations;
- How they are providing programs that are designed to enable special populations to meet the local levels of performance; and
- How they are providing activities to 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.

What does the law mean?

This requirement is focused on supports for special populations. The law challenges states to assist locals in directing resources or supports to close performance gaps and remove barriers. There may be different supports necessary to address different barriers and different populations.

What is the State's Role?

The analysis of student performance data described above should provide valuable data to inform the strategies that ensure success for each learner. In addition to the analysis conducted to assess performance gaps, eligible recipients must also evaluate how well they are providing access to and through CTE courses and programs of study for each learner. As a starting point, the state should define what **access** means in this context. While the geographic availability of CTE programs and programs of study is one way to tackle access, it is insufficient. Access must also take into consideration the removal of barriers – physical or otherwise – that are keeping certain learners away from, out of and/or less likely to succeed in high-quality CTE experiences.

The state should encourage locals to use a combination of quantitative data – such as enrollment trends and performance data described above – with qualitative data that may include student focus groups, family engagement or individual student interaction, which may occur during the stakeholder engagement process. The combination of both quantitative and qualitative data will provide a more complete picture of the current status and may provide meaningful direction to access, address barriers and performance issues.

The state should encourage locals to identify and assess the effectiveness of existing strategies to meet the needs of special populations in their CTE courses and programs of study, such as:

- How they support work-based learning opportunities for special populations and address common barriers to participation such as transportation or supplies;
- How they are collaborating with special education or other campus professionals to provide needed instructional support;
- How they are addressing the needs and making adaptations for special population in career technical student organizations (CTSOs) or local competitive events and activities; and/or
- Their recruitment efforts in elementary, middle and high schools, with a focus on ensuring diversity and inclusion.

Getting Started

Before the state begins developing its templates, guidance and processes for the comprehensive local needs assessment and local application, there are a few key steps to consider:

- **Engage the field:** Consult with local CTE administrators and instructors representing secondary and postsecondary institutions, urban and rural communities, and all CTE delivery models. The state may want to form a working group focused exclusively on building out these templates, processes and related supports
- **Provide data packs or dashboards:** Gather relevant data – on CTE performance, labor market information, faculty and staff recruitment and retention, etc. – and, if possible, disaggregate at the regional or even local recipient level. This will help locals jump right in and fill in data gaps, rather than start from scratch.
- **Identify major state initiatives that eligible recipients should be considering:** The state likely has a number of efforts, supports and programs underway aligned with key requirements in the local needs assessment, such as teacher recruitment and certification programs, supports for special populations or work-based learning platforms, to name a few. These should be well communicated with eligible recipients so they can address how they may be leveraging those resources in their needs assessment and local application.

What Role Should Stakeholders and Stakeholder Engagement Play in Upfront Input?

What does the law say?

In conducting the comprehensive needs assessment, and developing the local application, an eligible recipient shall involve a diverse body of stakeholders, including, at a minimum

1. Representatives of CTE 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;
2. Representatives of CTE programs at postsecondary educational institutions, including faculty and administrators;
3. Representatives of the State board or local workforce development boards and local or regional industries;
4. Parents and students;
5. Representatives of special populations;
6. Representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at-risk youth;
7. Representatives of Indian Tribes and Tribal organizations in the State, where applicable; and
8. Any other stakeholders that the eligible agency may require the eligible recipient to consult.

What does the law mean?

Under Perkins V, eligible recipients now must consult with a wide array of stakeholders during the needs assessment process and the development of the local application. This is an expansion of the current consultation process that is included in Perkins IV related to the local plan. This provisions aims to ensure that the local needs assessment takes into account a diversity of perspectives on how well the local CTE system is currently doing and where it needs to be improved to meet the needs of both learners and its economic region.

What is the State’s Role?

Robust stakeholder engagement may be a significant shift for eligible recipients and an area where the state can provide guidance, tools and supports to ensure locals gather the input they need to inform their CLNA and local application. While stakeholder engagement may seem overwhelming, it is an incredibly powerful opportunity for locals to engage existing and new partners and build support for CTE among the broader community.

It is important to allow each of the stakeholder groups to provide input from their unique perspective rather than only putting them in a large focus group with a representative from each group, so the state should ensure local flexibility in this regard.

In addition, the state may:

- Develop and share communication strategies for the local eligible recipients to inform the value and purpose of the stakeholder engagement process.
- Provide guidance for locals on how and with whom to conduct focus groups and surveys of key stakeholder groups, including providing sample questions for different groups that allow individuals to speak from their unique perspective to the programs and programs of study offered, student performance, and use of funds. Such sample questions should include open-ended questions such as “What are your greatest concerns about the future of your business;” “How can CTE programs serve you better;” or “What has been your experience with CTE and CTE students?” These allow for individuals to speak their mind rather respond to narrow questions.

For Consideration:

The state may require or provide incentives (financial or otherwise) to encourage consortia of eligible recipients to conduct a joint comprehensive local needs assessment that looks at a region’s entire CTE system. This will provide a fuller picture of CTE’s strengths and gaps, provide a meaningful opportunity for collaboration (within and across secondary and postsecondary) and, potentially, reduce the burden on stakeholders who may be tapped by multiple eligible recipients as stakeholders.

- Provide listings of contacts within offices and agencies for eligible recipients to use in identifying stakeholders to engage in individual focus groups or the broader stakeholder engagement activities that may not be immediately accessible in the local eligible recipient’s area.
- Provide technical assistance for local eligible recipients as they conduct individual focus groups, listening sessions or other engagement activities for identified stakeholder groups.

Finally, the state may encourage eligible recipients to be more creative and collaborative in designing stakeholder engagement and can provide guidance or incentives for secondary and postsecondary eligible recipients to partner and conduct joint stakeholder engagement on the full CTE system in their region. This not only allows locals to get a broader perspective but it may also potentially reduce the burden of key stakeholders.

What Role Should Stakeholders and Stakeholder Engagement Play Annually?

<p>What does the law say? An eligible recipient will consult with stakeholders on an ongoing basis, as determined by the eligible agency. This may include consultation in order to:</p> <ol style="list-style-type: none"> 1. Provide input on annual updates to the comprehensive needs assessment 2. Ensure programs of study are <ol style="list-style-type: none"> a. responsive to community employment needs; b. aligned with employment priorities in the State, regional, tribal, or local economy identified by employers, which may include in-demand industry sectors or occupations identified by the local workforce development board; c. informed by labor market information; d. designed to meet current, intermediate, or long-term labor market projections; and e. allow employer input, including input from industry or sector partnerships in the local area, where applicable, into the development and implementation of programs of study, including activities such as the identification of relevant standards, curriculum, industry recognized credentials, and current technology and equipment; 3. Identify and encourage opportunities for work-based learning; and 4. Ensure funding under this part is used in a coordinated manner with other local resources. 	<p>What does the law mean? Perkins V requires continued consultation with the stakeholder groups involved in the local needs assessment development, with specific parameters determined by the eligible agency. It supports the idea of maintaining a stakeholder group with representation from required groups and others who provide regular insight into the ongoing planning and implementation of quality CTE programs and programs of study.</p>
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What is the State’s Role?

The state may choose to develop a protocol for locals to follow with stakeholder engagement in the CLNA on an annual basis. One model the state may encourage is developing or strengthening any requirements around local advisory committees. The role of the stakeholder group is very similar to what a good advisory committee provides to local CTE programs, although few local advisory committees include such diverse representation and look at an entire local recipient’s program offerings collectively. The state should review and update current guidance on advisory committees to create alignment to this new stakeholder requirement. The state may also simply provide guidance on this annual process – whether all stakeholders are brought together for a singular input session (a possibility for rural eligible recipients) or through a series of focus groups or smaller discussions (which may be more appropriate for larger eligible recipients). In any case, the state should signal this annual engagement is not just a check the box but a meaningful way for eligible recipients to get feedback from key stakeholders and re-engage them around the design and delivery of CTE.

Where Does The State Want to Invest Resources?

<p>What does the law say? In addition to the overall requirement that local funds be used to support CTE programs of sufficient size, scope and quality to be effective (and reflect the needs assessment), the law includes six “required” activities:</p> <ol style="list-style-type: none"> 1. Provide career exploration and career development activities through an organized, systematic framework; 2. Provide professional development for a wide variety of CTE professionals; 3. Provide within CTE the skills necessary to pursue high-skill, high-wage or in-demand industry sectors or occupations; 4. Support integration of academic skills into CTE programs; 5. Plan and carry out elements that support the implementation of CTE programs and programs of study and that result in increased student achievement; and 6. Develop and implement evaluations of the activities funded by Perkins (including the CLNA). 	<p>What does the law mean? The law specifies the required uses of funds that must be addressed by the local eligible recipient. The local application should require enough detail to document the impact of those funds on the requirement. The most important change to recognize is that the allocation of resources by local eligible recipients must be aligned with the results of the comprehensive local needs assessment, a significant shift from Perkins IV. While the majority of the current uses of funds are still covered, there are no longer discrete “required” and “permissive” uses of funds subsections, but instead, many of the former “permissive” uses are included as options under required activities. These options can be thought of as ways to accomplish the requirements.</p> <p>Key activities such as purchasing equipment and supporting CTSOs, work-based learning, and dual and concurrent enrollment, among numerous others (20 in total), are included under the elements that support implementation of programs and programs of study.</p>
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What is the State’s Role?

While the overall list of required uses of funds has been streamlined, the list is still very broad with regard to the types of activities and strategies it can support. There is also a lengthy list of permissible use of local funds embedded within the required uses. Based on the input of the stakeholder groups and the established state priorities, the state may want to limit the list of permissible uses of funds – or cap the amount of money that can be spent on any individual use of funds – to ensure resources are being used efficiently rather than spread too thin on too many initiatives. For example, if the state identifies strengthening secondary and postsecondary alignment as a statewide priority and common area of improvement for eligible recipients, the state may direct a certain amount of funds towards local collaboration (a permissible use under #5).

How Will States Design the Local Application?

What does the law say?

Each eligible recipient must submit a local application to be eligible for funding, and the local application should cover the same time period as the state plan (four years). Eligible agencies can add additional requirements (as under current law), but the local application must include:

1. A description of the results of the comprehensive needs assessment;
2. Information on the CTE course offerings and activities to be provided with Perkins funds, including at least one state-approved program of study;
3. A description of how the eligible recipient, in collaboration with local workforce development partners, will provide a series of career exploration and career guidance activities;
4. A description of how the eligible recipient will improve the academic and technical skills of students participating in CTE programs;
5. A description of how the eligible recipient will provide activities to prepare special populations for high-skill, high-wage, or in-demand occupations; prepare CTE participants for non-traditional fields; provide equal access for special populations to CTE courses, programs, and programs of study; and ensure that members of special populations will not be discriminated against;
6. A description of the work-based learning opportunities for students participating in CTE programs and how the recipient will work with representatives from employers to develop or expand work-based learning;
7. A description of how the eligible recipient will provide students participating in CTE the opportunity to gain postsecondary credit while still attending high school;
8. A description of how the eligible recipient support the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel; and
9. A description of how the eligible recipient will address disparities or gaps in performance between groups of students 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 that will be taken to eliminate these disparities or gaps

What does the law mean?

By replacing the “local plan” with “local application,” Perkins V is signaling that while funding may be allocated to an eligible recipient via the formula, the funds are not a guarantee. Funds are dependent on approval of a local application – and one that reflects the findings of the comprehensive needs assessment and stakeholder input.

States may choose to require additional components to the local application that align with state goals, including minimums or caps on how much funding can be dedicated toward certain purposes or priorities, such as programs of study.

What is the State’s Role?

Set Clear and Compelling Requirements:

The format of the local application is extremely important to ensure the eligible recipients meet the requirements of the law. When designing the local application, states must take care to clearly list the requirements as defined in Perkins V along with the opportunity for the eligible recipient to respond to each requirement. The state also has the flexibility to add requirements that address state priorities or state goals, such as major statewide initiatives or postsecondary

attainment goals. It is imperative that the state create a local application that aligns to the state's overall goals while allowing enough flexibility to meet local needs.

Before designing the local application, consideration must be given to whether the eligible recipient will be required to participate in statewide activities that respond to the requirements of the law, such as specific professional development or trainings.

Communicate the Importance of the CLNA and Local Application

The detail required may seem overwhelming for locals to complete, which is why the state needs to communicate effectively about the purpose and value of the need assessment early and often before locals even begin their work. It should be communicated this is a process about the continuous improvement of CTE similar to school/campus improvement processes. It is about moving the entire state forward toward state CTE goals to advance learner success while meeting workforce needs and economic priorities for the state and local regions.

Simplify the Application Process

States should encourage accurate and complete responses in the local application that effectively address the requirements without writing a thesis. It is important to require enough detail to ensure the local is addressing each requirement adequately, but word limits and sample responses can go a long way in helping with focus. The state should ask for supplemental information – such as summaries of data and information collected through stakeholder engagement – to be submitted as attachments to the local application. Finally, if possible, the local application should be created for electronic completion and submission.

Strategies for Local Application Development

- Develop the local application in response to the requirements of the law, stakeholder engagement and requirements of the CLNA, with input from local CTE leaders.
- Consider additional requirements the state agency may want to require.
- Clearly define which activities local eligible recipients may use Perkins funds on – and how much or what percentage of funds may go to each allowable activity. The state may set minimum or maximum spending caps for certain activities and simply eliminate activities it deems less important.
- Design an electronic application for ease of completing and submitting to the state agency.
- Field test the local application with volunteers to get input from local eligible recipients. Make sure to engage small and large eligible recipients as well as those representing all delivery models to ensure the state is providing the right mix of guidance and flexibility to support all eligible recipients.
- Provide professional development for eligible recipients on completing the local application.
- Provide ongoing technical assistance during the local application development timeframe.
- Establish the state agency approval process including the level of specificity and detail required to be approved.

How will the State Review and Approve Local Applications to Ensure They Align with and Reflect the CLNA?

What does the law say?

The submitted state plan must include a description of the criteria and process for how the eligible agency will approve eligible recipients' local applications. That criteria and process must take into account how the eligible recipient will:

- Promote academic achievement;
- Promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and
- Ensure the comprehensive needs assessment takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations.

What does the law mean?

While Perkins IV required states to identify the criteria for local plan approval in the state plan, Perkins V now requires criteria and the process for local application approval. Perkins V also requires the state to take into account the local needs assessment as part of its local application approval.

What is the State's Role?

As the state eligible agency identifies the **criteria** for local application approval, each of following must be met:

- The comprehensive local needs assessment must be the dominant source on which the components and strategies detailed in the local application are based. If there is not enough evidence that demonstrates how the plan of action put forward by eligible recipients reflects the major gaps or needs identified through the needs assessment, the local application may be returned for additional alignment. The CLNA should not be viewed by the state nor eligible recipients as a one and done activity, it is a part of the evaluation and continuation of the local application.
- Each of the required components of the local application must be addressed with enough detail to justify approval that the information/activity satisfies the required components.
- Each of the required uses of funds, including all CTE course offerings and activities, must be addressed with enough detail to document that the requirement is met.

The state eligible agency now must also identify the **process** that will be used to approve the local application. When doing so, the state should consider how it will:

- Clearly articulate the timeline local eligible recipients must meet.
- Identify and communicate out the approval process that will be used once submitted to the state eligible agency.
- Establish an approval checklist for both the local eligible agency and state agency to use that identifies all required components of, as well as the level of detail and quality of content that is expected in all responses on, the local application.
- Provide technical assistance to local eligible recipients on completing the local application.
- Ensure consistency of approval process through training of the individuals responsible for approving applications.
- Establish and communicate a process for returning applications for changes or additional information to meet requirements.

How Will the State Build Local Capacity to Support CLNA and Local Application?

Perkins V clearly places a great deal of emphasis on the comprehensive local needs assessment. It is the starting point for local eligible recipients and informs the entire process of completing the local application and utilizing the Perkins funds. If eligible recipients conduct the needs assessment with authenticity, it will provide the framework for the local application and, more importantly, will provide needed information to improve CTE programs and support for CTE learners.

Some strategies to help build capacity for eligible recipients include:

- Ensuring templates created for the comprehensive local needs assessment and local application are clear and easy to read, augmented by practical guidance.
- Providing as much data – both student-level performance and labor market data – to locals through easy-to-use formats, such as a dashboard.
- Offering face-to-face professional development and technical assistance to provide for meaningful exchange of information and immediate response to questions.
- Developing training videos that are available for just-in-time use.
- Maintaining a real-time frequently asked question resource highlighting questions/issues that are raised by eligible recipients throughout the process. This tool should be shared on a regular basis and updated regularly based on new questions asked from the field.
- Recruiting state-level partners from workforce and other agencies to help promote and coordinate involvement in the CLNA and local application process among their eligible recipients, members and/or staff.
- Providing a contact list for local eligible agencies of state or regional workforce offices, Tribal agencies, and agencies serving out-of-school, homeless and at-risk youth for locals to use in stakeholder engagement and input for the local application.

Conclusion: How Can the State Ensure Continuous Improvement with Future CLNA and Local Applications?

It was an intentional and thoughtful decision in Perkins V to move from a local plan to a local application based on a comprehensive local needs assessment. This is not just a name change, but rather a shift in how local programs should be designed, delivered and sustained. While it may seem initially burdensome to eligible recipients, it can be a powerful tool for program improvement and sustained and meaningful engagement of key stakeholders and partners.

The state has a critical role in not only communicating the value and importance of the CLNA, but identifying ways in which these new requirements can be integrated into the broader CTE system to support continuous improvement moving forward.

To start, the state must determine if locals must revisit the CLNA each year or every two years. Once the process is in place for the CLNA, it should simply become a part of the improvement process for CTE programs. The state should explore how the CLNA can become a part of the state's accreditation and school improvement process. The state may decide to have the CLNA enhance or replace the CTE evaluation process for state accreditation. The CLNA should certainly be incorporated into the state's school improvement process. Incorporating the CLNA into these processes could elevate the status of CTE within these systems. It also reinforces the importance of a well-executed CLNA to drive programmatic decisions.

In addition, the state should consider how the CLNA becomes a part of the work of local advisory committees or industry and sector partnerships – and vice versa. This appears to be a natural fit with the work of a strong advisory committee or industry council. It would also give these bodies meaningful work and input into CTE not only at the program level, but at the district, school, institution or regional level.

The state may consider producing a statewide document that summarizes some of the most impactful findings of the needs assessment. This could be an important guidance tool for the state and could be shared on a statewide basis with business and industry to secure needed support for addressing the issues identified. It could also drive decisions about state leadership funds.

Finally, the state should consider the role of the needs assessment is the state's program approval and review process. It may align with the ongoing process or could be added to the approval and review process – or the review process could be used to inform the local needs assessment. The needs assessment could be scored as a part of the local application, in particular the alignment between proposed activities and the CLNA. The more the CLNA becomes a part of "how we do business" the greater the acceptance and potential for the needs assessment to become an impactful tool.

Relevant Resources

- Using Needs Assessments for School and District Improvement: A Tactical Guide (Council of Chief State School Officers & The Center on School Turnaround): <https://ccsso.org/sites/default/files/2017-12/Using%20Needs%20Assessments%20For%20School%20and%20District%20Improvement.pdf>
- School Interventions That Work: Targeted Support for Low-Performing Students (Alliance for Excellent Education): https://edworkforce.house.gov/uploadedfiles/testimonyt_lovell_appendix.pdf

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