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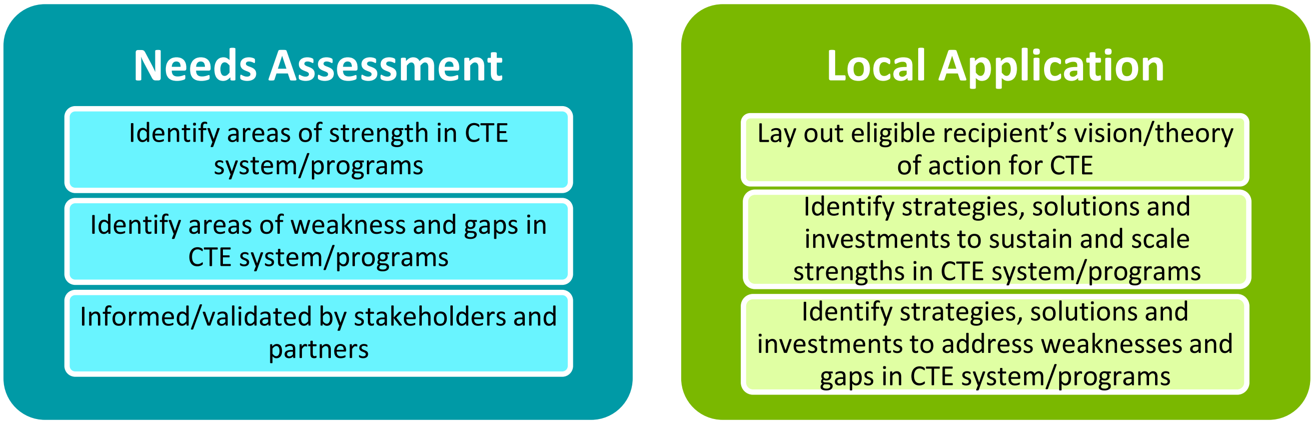
Driving Quality & Equity in CTE: A State Guide to Developing the Perkins V Comprehensive Local Needs Assessment Template

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 purpose of the CLNA is to support data-driven decisionmaking and more closely align planning, spending and accountability activities under Perkins V. The results of the local needs assessment must form the foundation of the local application and drive local spending decisions. The strengths and weaknesses identified in the local needs assessment should seamlessly connect to the strategies and activities outlined in the local application. For more background on the purpose and the power of the CLNA to increase both the quality and equity of Career Technical Education (CTE) programs, see A Guide for State Leaders: Maximizing Perkins V's Comprehensive Local Needs Assessment & Local Application to Drive Quality and Equity in CTE.



As part of their four-year state Perkins plan, states must include a copy of the CLNA template and/or guidelines that they will provide to eligible recipients to help them meet this new requirement. Creating such guidelines or a template will require careful consideration of a state's priorities, CTE delivery structure, technical systems and review capacity. This tool will walk through the necessary steps and provide a bank of questions to draw from to help states create a template that elevates and addresses state and local priorities.

Two sections follow: "Key Decisions to Make about Your State's Comprehensive Local Needs Assessment" and "Sample Questions for Your State's Comprehensive Local Needs Assessment."

Section 1: Key Decisions to Make about Your State's Comprehensive Local Needs Assessment

1. **What are your state's priorities for the CLNA?**
   In addition to the requirements in the law itself, states needs to consider if there are additional state-level priorities that you want to emphasize in the CLNA and the aligned local application. For example, you may want to ask specifically about elements of program quality that are a priority in your state, such as work-based learning, or you may want to incorporate questions that focus on alignment to other priority programs, such as those funded by the Workforce Innovation and Opportunity Act (WIOA). Review the requirements as outlined in the law and compare them to your state's vision, goals or other strategic priorities to determine what should be added or made more explicit in your guidance to drive greater focus for eligible recipients.

   One note of caution: You need to consider how to help eligible recipients balance state priorities and requirements with regional and local priorities, particularly considering the resources they have available. Expecting recipients with limited capacity and funding to be able to address every priority of each stakeholder participating in the CLNA as well as state-level priorities is impractical. States can drive the local prioritization process by setting state goals and providing guidance on the relationship between CLNA results, the local application and funding requests as well as on potential alternate or additional sources of funding beyond Perkins.

2. **How will you align the Perkins V needs assessment with other required needs assessments?**
   A number of other federal programs, such as the Every Student Succeeds Act (ESSA) and WIOA, explicitly require needs assessments or suggest similar data-driven decisionmaking. Some states even require additional needs assessments on top of those required by federal programs. It is important to think critically about how to align the Perkins CLNA with these processes, build on work already underway in districts and postsecondary institutions, and drive systems alignment and common goals. For example, you may want to look at how stakeholder engagement requirements overlap and could be coordinated or how submission deadlines can be aligned. However, ensuring that eligible recipients are looking at all of the required content areas of the Perkins CLNA, and not merely using a generic needs assessment adopted for another purpose, is critical. You can use the Advance CTE crosswalk tool to spark discussion in your state about possible opportunities for alignment and coordination.

3. **How will you structure the needs assessment development and submission process for eligible recipients?**
   You will need to determine whether each individual eligible recipient of Perkins funds will develop and submit a single CLNA or if you will allow — or require — eligible recipients to collaborate on a regional

approach that bridges secondary and postsecondary levels and regional labor markets. Many hybrid models combining these two approaches can be used as well, such as requiring specific regional collaboration during the CLNA but individual local applications. Regardless of the approach your state takes, this choice will have major implications for the state role in the design and implementation of the CLNA guidelines and communications with the field. Advance CTE will be providing more resources on requiring, incentivizing and supporting a more regional and cross-sector approach during summer 2019.

4. **When will you require updates of the CLNA and related application pieces?**
   Perkins V requires that the local application initially cover the same time period as the state plan — four years. It also requires that the CLNA be completed before the first local application (so that the results can be included) and then "updated" at least every two years. Within those requirements, however, states have significant flexibility to decide what will be required each year and how updates to the CLNA and local application will be structured.

   For example, states may want eligible recipients to update specific portions of the needs assessment more often than every two years. Requirements for "updates" may also vary at the two-year mark. States must also determine how to handle updates to the local application once the CLNA has been updated. How will eligible recipients need to connect their updates to the CLNA to their local applications? Will you require anything other than a budget to be submitted in years with no update to the CLNA? Before finalizing your template you should carefully think through these decisions so that you can structure your document appropriately and provide clear directions to locals about what is to come.

5. **What requirements will you set around stakeholder engagement?**
   Perkins V outlines minimum requirements for consultation with stakeholders as the CLNA is conducted and the local application is developed. However, the list of required stakeholders is broad, and there may be more specific groups or entities in your state that locals should also include, such as historically marginalized groups. States are given the authority in the law to expand or clarify stakeholder engagement requirements, and this additional guidance should be included as part of the CLNA template or other tools. In addition to any clarification on the types of stakeholders that should be included, guidance should also be provided on any specific types of stakeholder engagement that should be documented during the CLNA process.

6. **What data will be provided to eligible recipients, and how will you provide those data?**
   You should determine what data you can provide to eligible recipients to ease the CLNA process. For example, student performance data, labor market information and information on the teacher workforce might all be available at the state level. These data should be structured in easy-to-understand ways and provided through dashboards, reports or other means. Student performance data, in particular, should be

disaggregated by all of the required categories in Perkins V and provided at the program level whenever possible. The state may need to provide guidance or training around data literacy to support interpretation of the data — particularly labor market data, which may be new to some eligible recipients, and disaggregated performance data, which can be difficult or overwhelming to parse, especially for stakeholders outside of the education system.

7. **What guidance will you provide around evidence required or definitions of terms?**
   In addition to the data you provide, you will need to determine what evidence from the needs assessment you want locals to collect, submit or keep on file for monitoring. For example, do you want the actual labor market data included in the narrative of the CLNA or only a summary with underlying data kept on file at the local level? How much raw information do you want to collect, such as survey or focus group data or notes from stakeholder engagement meetings?

   You will also need to decide how to set standards around evidence to ensure the validity and reliability of the data on which the CLNA is based. You may want to require that data come from specific, reliable sources or, in the case of labor market data, that particular thresholds are used for identifying equity gaps or in-demand occupations. You will need to build into your local needs assessment template guidance on these data sources, as well as specific prompts that require locals to think through the evidence on which they are basing decisions.

   Finally, a number of terms, such as "size, scope and quality," "disproportionality" and "high wage," are required or likely to be used in the CLNA. These terms must be clearly defined to ensure not only that the evidence is valid and reliable but also that information is comparable across the state. Think through these terms and draft operational definitions to help your eligible recipients consistently address questions or criteria in the needs assessment.

8. **How will you structure and order the topics that must be included in the CLNA?**
   The law outlines six specific topics, and no single one is weighted higher than the others. However, several of the categories potentially overlap, and for ease of responding, you may want to combine or streamline the categories when designing your template or guidelines — or even break some of them down. For example, if your state's definition of "size, scope and quality" is robust, it might cover the implementation of programs of study, and that category could be collapsed. Or you might leave size and scope separate and fold together "quality" and "progress toward implementing programs/programs of study." The first approach is used in Section 2 of this document.

   Regardless of how you organize topics, you should consider how to ensure that eligible recipients are drawing connections between the sections of the document, many of which are interrelated. For example, labor market information, program quality and equity are all explicitly connected, and answers to questions in one section of the CLNA might inform or be linked to answers in another section.

You will also need to think through the order in which you want to present topics to be addressed. You do not have to follow the specific order provided in the law, and the order may depend on the nature of your eligible recipients. For example, if using a regional approach, you may want recipients to start with labor market information that would be common across their area and then dive into student performance and program quality. In other scenarios, you may want to begin with student performance data and then explore issues of equity and access uncovered in those data.

9. What specific questions will you have eligible recipients address in the CLNA?

The bulk of your CLNA template or guidance will be specific questions or prompts related to the required topics. For each category, you will need to pick a few key questions that will help your eligible recipients drill down into the topic, identify what is working well and should be scaled or continued, and identify any gaps or unmet needs that should be addressed in the local application. You may want to identify some priority questions that serve as anchors for each section.

A question bank with sample questions you can use to build your CLNA template is included in Section 2, but be sure to also consider the state priorities identified early in the planning process. You should think about other program evaluations or program quality standards you have in place and ensure that you are aligning the CLNA to those. For example, if you require CTE programs to meet a certain set of quality standards for state approval, aligning the program quality-related questions of the needs assessment to these standards would be appropriate to move all programs toward the highest levels of achievement. Depending on the breadth of your standards or review criteria, components may relate to other required CLNA sections as well, as discussed above.

Finally, as you review the questions in the question bank, you should consider how different eligible recipients might go about answering them. Consortia of multiple providers may need questions at a higher level than individual recipients. And you may want to require at least some different questions for secondary and postsecondary providers to address the needs of their unique student populations.

10. How will you help eligible recipients connect the needs assessment to the local application?

The connection between the CLNA and the local application is perhaps the most critical part of the Perkins V planning process. The primary purposes behind the new needs assessment requirement are to strengthen data-driven decisionmaking and to provide added focus to the use of Perkins funds at the local level. For these purposes to be accomplished, eligible recipients will need guidance on how to pull all of the pieces of the CLNA together to form a coherent action plan for strengthening CTE programs and student outcomes within their local application.

Sharing the local application when you release the CLNA template can help to bring this focus. Having the local application in hand early will allow eligible recipients to see how the two components of Perkins V planning are connected and begin to think early in the process about how they will address the needs identified in the CLNA.

You can also use your template or guidelines to encourage eligible recipients to be concrete and action oriented in translating CLNA findings into the local application. For example, you may want to include questions in the CLNA that ask participants to dig into root causes with stakeholders so that they are more prepared to connect needs to actionable activities in the local application. You may also want to require eligible recipients to articulate their vision for their CTE programming and their top priorities based on the needs assessment results in the local application and then follow with very targeted questions.

Finally, you should also begin thinking about resources and technical assistance you can make available to local eligible recipients to help them devise action plans based on their needs assessment results because some of the challenges identified may have complex solutions. As you are providing technical assistance and training around the CLNA, make sure to include the local application process in those discussions as well, so the two are seen as seamlessly connected.

11. How will you help locals recipients use the CLNA to drive funding decisions?

The final step in the initial CLNA process for eligible recipients will be determining how to use the results, and the action plans created through the local application, to allocate their local Perkins funding. Perkins V requires that local spending be aligned to the results of the CLNA. It is important for locals to think about the "required" uses of funds as ways to meet the needs they have identified, not as separate, stand-alone activities. The six required uses are broad enough that they are likely already occurring within the eligible recipient and should no longer be the sole driver of how Perkins funding decisions are made — instead, decisions should be driven by the CLNA. You will likely need to create new budget templates that clearly identify this link. And states can signal spending priorities by setting minimums or caps on how much funding can be dedicated to certain purposes or categories.

Section 2: Sample Questions for Your State's Comprehensive Local Needs Assessment

Below are sample questions to draw from as you develop your state's CLNA guidelines or template. Remember, you may choose to collapse certain sections to streamline the needs assessment or signal important connections between topics, such as size, scope and quality; program of study implementation; and labor market information. Below, questions on size, scope and quality and program implementation have been combined to avoid redundancies. You will also likely need to amend many of these questions to reflect the terminology used in your state and your priorities. Each section includes "top-line" and "other potential deep-dive" questions.

1. Student Performance

In this section, local eligible recipients must evaluate their learners' performance on federal accountability measures in the aggregate and disaggregated by race, gender, migrant status and special population groups, which can be found in Section 3(48) of Perkins V. In developing your template, you will likely want to list these groups specifically for eligible recipients to reference.

Top-line questions may include:

- Which performance accountability indicator targets are you meeting and not meeting at the eligible recipient, Career Cluster® and program levels? What are the root causes for meeting or not meeting these targets?
- How are learners from different genders, races and ethnicities performing in your CTE programs at the eligible recipient, Career Cluster and program levels, particularly in programs leading to high-skill, high-wage or in-demand industry sectors or occupations?
- How are learners from each special population performing in your CTE programs in comparison to students without identified special needs at the eligible recipient, Career Cluster and program levels, particularly in programs leading to high-skill, high-wage or in-demand industry sectors or occupations?
- What is the variation in performance among students in different Career Clusters and programs, and what is driving those differences in performance?

Other potential deep-dive questions may include:

- How are you performing on other measures of student performance (such as state and institution-specific indicators) at the eligible recipient, Career Cluster and program levels?
- Which groups of learners are struggling the most in CTE programs across the board? Which groups are having the most success? What are the root causes leading to these outcomes?

- Where do the biggest gaps in performance exist between groups of learners for each accountability indicator? What are the root causes of these gaps?
- Are there certain CTE programs in which specific special population groups are performing above average? Below average? What are the root causes of these differences?
- How are learners in your CTE programs performing on accountability indicators in comparison to non-CTE learners? What are potential explanations for these differences?

2. Labor Market Alignment

In this section, the law requires eligible recipients to evaluate the alignment between programs offered and the labor market needs of the local area, state and/or region — now and in the future.

Top-line questions may include:

- What industries are projected to grow the most in your state, region or local area in the short, medium and long terms? Which of these occupations meet a state-determined definition of "high skill" and/or "high wage?"
- To what degree do your CTE program enrollments match projected job openings in the state, region or local area? Where are the biggest gaps, particularly in high-skill or high-wage jobs?
- To what degree do your CTE program offerings expose learners to all the high-skill, high-wage and in-demand industry sectors or occupations in your region? Where are there gaps?
- To what degree do your CTE program offerings expose learners to the *emergin*g high-skill, high-wage and in-demand industry sectors or occupations in your region? Where are there gaps?
- What skills that industry partners need are you incorporating into your programs? What skills are lacking in your programs?

Other potential deep-dive questions may include:

- Where are completers of your program finding success in the labor market? Are there industries in which placement rates are low? If so, why?
- How are you validating the skills being taught in your programs with business and industry partners?
- How are you preparing students for the potential workplace of the future, using new trends and innovations?
- How are you being intentional about educating and providing supports for learners with disabilities, English learners, part-time students and other special populations in programs and programs of study leading to high-skill, high-wage or in-demand industry sectors or occupations?

- If you are not currently providing programs to meet the needs of high-skill, high-wage or in-demand industry sectors or occupations, how are other programs and service providers in your region addressing those labor market needs?

3. Size, Scope and Quality/Program Implementation

In this section, the law requires local eligible recipients to evaluate whether their programs, as a whole and individually, meet the state's specific definition of "size, scope and quality." Given the natural overlap with the required section on progress toward implementing programs/programs of study, those two sections have been collapsed in this document. Regardless of how you organize your needs assessment template, these sections should explicitly cover all the core elements required in your state for a state-approved program of study, such as course sequences, early postsecondary opportunities and industry-recognized credentials, as well as your state's specific definition of "size, scope and quality."

Top-line questions may include:

- How many programs are offered? How many programs of study? How do these numbers align with the state-required number of programs/programs of study?
- How does the number of programs/programs of study offered compare to the number of students who could potentially be served and to labor market needs?
- To what degree are students who want to enroll in your programs unable to do so because of capacity limitations, as determined by program wait lists, student surveys or other evidence?
- What is the involvement of secondary partners, postsecondary partners and employer/industry partners in the development, implementation and phasing out/closure of CTE programs?
- To what degree do your CTE programs of study have intentional course sequences that begin with introductory content and progress to more occupationally specific content?
- To what degree do your programs of study have multiple entry and exit points? How does this vary across programs or Career Clusters? Do programs incorporate stackable credentials?
- How fully are your programs aligned and articulated across secondary and postsecondary education? Across non-credit and credit programs? Across two- and four-year institutions?
- To what degree are learners in your programs earning recognized postsecondary credentials of value? Which credentials? How does credential attainment vary across programs or Career Clusters? Across student groups?
- How well are your programs/programs of study meeting program quality standards established by the state or a third party? Where are there gaps or needs to be addressed?

Other potential deep-dive questions may include:

- To what degree are you offering programs that are not part of programs of study? Why?
- To what degree are learners in your programs completing meaningful work-based learning experiences? How does this vary across programs or Career Clusters? Across student groups?
- To what degree do secondary students earn dual/concurrent enrollment credit in their program of study? How does this vary across programs or Career Clusters? Across student groups?
- To what degree do postsecondary students have opportunities to receive credit for prior learning? How does this vary across programs or Career Clusters? Across student groups?
- To what degree do learners have access to career advisement and development opportunities, both before entering CTE programs and during participation in programs/programs of study? How does this vary across programs or Career Clusters? Across student groups?
- To what degree do learners have access to job placement services? How does this vary across programs or Career Clusters? Across student groups?
- To what degree do learners in some or all of your programs of study have opportunities to participate in career technical student organizations (CTSOs)? How integrated are CTSOs with program curriculum? How does this vary across programs or Career Clusters? Across student groups?
- To what degree are your facilities and equipment adequate given your program and program of study offerings, student enrollment and labor market needs?
- To what degree do your CTE programs attend to the full range of CTE expectations (e.g., transferable career-ready or employability skills, broader Career Cluster-level skills, industry-specific skills and academic skills)? Where are the gaps?
- To what degree are your learners being retained in the same program of study when they transition between secondary and postsecondary? How does retention vary across programs or Career Clusters? Across student groups?
- To what degree do you have credit transfer agreements in place to help learners earn and articulate credit across education levels or between postsecondary institutions? How effectively are these agreements used? If they are not used effectively, why not?
- To what degree are programs of study aligned to career pathways, as defined by your state and/or in WIOA?
- To what degree are programs of study aligned with adult basic education or other workforce programs?
- To what degree are there opportunities for learners to explore careers or participate in CTE programs

or programs of study in middle school? How does this vary across programs or Career Clusters? Across student groups?

- To what degree do programs use data for program improvement and decisionmaking? How does the use of data vary across programs or Career Clusters?

4. Recruitment, Retention and Training of CTE Educators

In this section, the law requires local eligible recipients to assess and develop plans to improve the quality of their faculty and staff through recruitment, retention and professional development, with particular attention paid to diversity in the profession.

Top-line questions may include:

- To what degree do you currently have sufficient faculty and staff (including instructors, support staff, guidance and advisement professionals, administrators and other key staff) to offer high-quality programs of study and career development?
- To what degree do you anticipate having the faculty and staff (including instructors, support staff, guidance and advisement professionals, administrators and other key staff) needed to offer high-quality programs of study and career development in the short, medium and long terms?
- To what degree are faculty teaching your programs adequately credentialed? And to what degree do they have adequate workplace experience in the program area?
- How diverse is your faculty and staff? To what degree does it reflect the demographic makeup of your student body? What are the root causes of any gaps?
- What processes are in place to recruit faculty and staff? Are these processes efficient and effective, especially for instructors coming from industry?
- What processes are in place to induct and retain faculty and staff? Are these processes efficient and effective, especially for instructors coming from industry?
- To what degree do you offer regular, substantive professional development opportunities for faculty, staff and administrators? How effective are these experiences at improving student outcomes?

Other potential deep-dive questions may include:

- In what subject areas do you need to develop or recruit faculty and staff due to looming retirements, growing student interest and/or emerging priority employment areas?
- To what degree do faculty, staff and administrators have opportunities to work with and learn directly from representatives of business and industry?
- To what degree do faculty, staff and administrators have opportunities to work with and learn directly

from their peers in formal or informal professional learning communities?

- What specific supports are available for faculty and staff from under-represented groups?
- What do faculty, staff and administrators report as needs and preferences for professional development, benefits and supports?
- What professional development offerings are most highly rated by participating faculty, administrators and staff? Why?

5. Improving Equity and Access

In this section, the law requires eligible recipients to evaluate their progress in providing equal access to CTE programs, particularly CTE programs that lead to strong positive outcomes for learners, and in providing CTE in ways that maximize success for special populations, especially in programs leading to high-skill, high-wage or in-demand industry sectors or occupations.

Potential top-line questions may include:

- To what degree are student groups taking part in CTE at disproportionate levels, in comparison to the overall student population, at the eligible recipient, Career Cluster and program levels? Which groups are over- and under-represented, particularly in programs leading to high-skill, high-wage or in-demand industry sectors or occupations? What are the root causes of these gaps?
- What efforts have been made to recruit and retain diverse populations of learners into your programs, particularly in programs leading to high-skill, high-wage or in-demand industry sectors and occupations? Which ones have been most and least effective? Which ones are under-used?
- What barriers (such as prerequisites/admission requirements, transportation, child care or scheduling) prevent certain populations of learners from accessing your programs? Which student groups are most affected by these barriers?
- What barriers prevent certain populations of learners from taking part in embedded activities such as work-based learning, accelerated credit (including dual enrollment) and CTSOs? What are the root causes of these barriers? Which student groups are most affected by these barriers?

Other potential deep-dive questions may include:

- How and when do you recruit students into your programs? Are you reaching all students, including students from groups identified as special populations? Consider where and how you conduct outreach.
- To what degree do students have access to career guidance that is comprehensive, equitable and unbiased?

- To what degree do faculty and staff have access to professional development on providing instruction, career development and other services to students in an equitable, unbiased manner?
- What differentiated accommodations, modifications and supportive services do you currently provide to ensure the success of special population groups? Which ones have been most and least effective? Which ones are under-used? To what degree do these supports align with student Individualized Education Plans?
- What additional accommodations, modifications and supportive services would help ensure access and equity for all students within your programs?
- What additional resources — such as WIOA Title I funds or Pell grants — might be available to support certain learners?
- How are you aligning with other federal or state programs, such as Temporary Assistance for Needy Families or SNAP Employment & Training, to ensure that CTE students can access additional supports that may be available?

6. Making the CLNA Actionable

To conclude the CLNA process, eligible recipients will have to merge the analyses outlined above into one set of findings and engage stakeholders to develop an action plan for addressing these needs, including deciding which programs and activities to prioritize for funding in their four-year Perkins V local application. Following are a few key questions you may want to consider including in guidance or your local application template to help locals make their findings actionable:

- What is your overall vision for CTE programming?
- What are your top (three to five) priorities over the next four years?
- Across the board, which of your programs are the strongest? The weakest? What is your plan for continuing to support or expanding the stronger programs and transforming or retiring the less successful ones?
- Which performance indicators are you struggling with the most? What strategies do you plan to employ to address those needs?
- To what degree are there immediate employer needs in your community that you can help meet? What about longer term needs toward which you can start building a pipeline?
- Across the board, which elements of your programs are the strongest (e.g., career advisement and development, work-based learning, learner supports, credentialing, course sequencing, etc.)? The weakest? Which of the weaker elements could you address to have the largest impact on student performance? Which of the stronger elements need to be scaled to more programs or learners?

- What is you plan for moving more of your CTE programs to full, state-approved programs of study, including clear course sequences and aligned career pathways leading to recognized postsecondary credentials of value?
- Which professional development needs are most pressing? What strategies will you use to recruit, retain and support instructors and staff over the next four years to ensure that your programmatic and performance goals can be met?
- Which student groups are struggling the most in your programs? Which programs or program elements are the least accessible to particular student groups? What are the potential root causes of inequities in your CTE system? Which of these root causes can be addressed immediately? Which ones need a more comprehensive long-term plan? What strategies do you plan to employ now and over the next four years to support learners?
- Where do you most need support — professional development, technical assistance, access to peer networking, etc. — from the state?

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This tool builds on previous resources from:

- The Association for Career and Technical Education: A Guide for Local Leaders: Maximizing Perkins V's Comprehensive Local Needs Assessment & Local Application to Drive CTE Program Quality and Equity; and
- Advance CTE: A Guide for State Leaders: Maximizing Perkins V's Comprehensive Local Needs Assessment & Local Application to Drive Quality and Equity in CTE