

STATE  **DIRECTORS**
National Association of State Directors
of Career Technical Education Consortium

September 14, 2007

The Honorable George Miller
Chairman, Committee on Education and Labor
U.S. House of Representatives
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable Howard "Buck" McKeon
Ranking Member, Committee on Education and Labor
U.S. House of Representatives
2101 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Miller and Ranking Member McKeon:

The National Association of State Directors of Career Technical Education Consortium (NASDCTEc) appreciates the opportunity offered by the House Committee on Education and Labor to submit comments on the discussion draft of the reauthorization of the No Child Left Behind Act. Our comments are offered with the understanding that this is indeed a continuing work-in-progress, and we are hopeful that the Committee will take our concerns into consideration when drafting the version of the bill that will be formally introduced.

NASDCTEc is pleased that the Committee has recognized within the law that both career and academic education and counseling are critical components of our education system. We are also very grateful of the Committee's recognition that career technical education (CTE) can play a leading role in improving our national graduation rate. This reauthorization of NCLB, as it is currently drafted, will help expand contextual learning opportunities, such as those provided through CTE and will, in many ways, be a cornerstone in assuaging our dropout crisis.

We are also supportive of the Committee's the section on Postsecondary and Workplace Readiness (Sec. 1111A), which will allow states to ensure that their academic standards

for secondary education prepare students for successful entry into either their postsecondary education or their careers. We believe this will drastically reduce the need for remediation and create a cohesive and integrated education system. Furthermore, this will ensure a greater degree of responsiveness to the needs of both the business community and the student.

NASDCTEc supports the direction the Committee has taken in moving towards a growth model system and we hope the system will continue to be finely-tuned as debate on this discussion draft ensues. We also support the Committee's decision to implement a common graduation rate calculation and differentiated consequences for not attaining adequate yearly progress (AYP). We applaud the Committee on its inclusion of the section on Data Systems and Requirements (Sec. 1123), but hope that it will work on reducing the unnecessary complexity in its requirements. Such a data system prescribed by this section will be very burdensome to create in its current form.

While we are appreciative of the changes already enumerated, NASDCTEc also has several serious concerns of the following issues within this discussion draft:

Sec. 1006 Graduation Promise Fund

We are appreciative that the Committee has adopted the Graduation Promise Fund, seemingly built upon the Graduation Promise Act sponsored by Congressman Ruben Hinojosa. Particularly, we find that the acknowledgment that middle school students need proper career counseling in order to help ensure success in high school and beyond is both critically needed and refreshing. Far too often, students are woefully unaware of the academic and career options available to them, and are further unaware of what they need to accomplish in order to achieve their goals. This results in students becoming disengaged from the education process, believing that their education is irrelevant to what they will do when they leave school.

However, the Graduation Promise Fund is not nearly as comprehensive as the Graduation Promise Act, which identifies a series of effective and proven methods for personalizing a student's educational experience and improving the likelihood of a student completing their high school education. Among these methods include creating smaller learning communities, implementing collaborative teaching models, increased career and academic counseling, and providing contextual learning opportunities, such as a high-quality career technical education program. As such, we

strongly urge the Committee to adopt the Graduation Promise Act, or to implement more of the provisions it contains within the Graduation Promise Fund.

Sec. 1111 (b)(2)(E) State Plans – System of Multiple Indicators

While we appreciate that the Committee has included provisions to allow the use multiple indicators in determining AYP, we feel the law still places too much emphasis upon the existing two state assessments, and thus, places large constrictions on the development of curricula. NASDCTEc urges the Committee to develop a more equitable weighting system for approved additional indicators. Furthermore, we strongly urge for CTE assessments and credentials to be included among the allowable indicators.

Integration of Academics and Career Technical Education

Congress intended for a greater integration of academics within career technical education programs within the Carl D. Perkins Career and Technical Education Act. NASDCTEc feels strongly that this integration will require CTE administrators and educators to be a part of the NCLB planning and review process if there is to be a cohesive academic plan within a local education agency. To this end, we strongly urge the Committee to consider the following amendments:

Section 1111 (e)(1)(B)(ii) Peer Review and Secretarial Approval

(ii) Include representatives of parents, teachers, State educational agencies, local educational agencies, and state and local administrators of career and technical education programs defined in 20 USC 2303;

Section 1114 (b)(2)(B)(ii) Schoolwide Programs – Plan Development

“Developed with the involvement of parents and other members of the community to be served and individuals who will carry out such plan, including teachers, principals, and administrators (including administrators of career and technical education programs defined in 20 USC 2302), and, if appropriate, pupil services personnel, technical assistance providers, school staff, and, if the plan relates to a secondary school, students from such school;”

Section 1903(b)(2) State Administration

(2) MEMBERSHIP – Each such committee shall include—

(A) as a majority of its members, representatives from local educational agencies;

(B) administrators, including **career and technical education administrators** and the administrators of programs described in other parts of this title;

(C) teachers, including **career and technical** educators;”

Furthermore, we believe that achieving full integration of academic and career technical education curricula requires ensuring that career technical education teachers have the resources and assistance necessary to achieve “highly qualified” status. We urge the Committee to provide increased flexibility for educators that teach courses for which both academic and technical credit are offered. NASDCTEc also proposes the following legislation authorizing the Secretary to create a national program to facilitate this process:

Section [] National Activities of Demonstrated Effectiveness

“(a) Career and Technical Educator Training for Academic Integration

(1) IN GENERAL – The Secretary is authorized to establish and carry out a national program dedicated to recruiting highly qualified career and technical education teachers and assisting career technical education teachers in pursuit of certification as a highly qualified teacher through activities such as:

(A) Carrying out professional development programs that prepare current and aspiring career technical education teachers to undergo the certification process of becoming a highly qualified teacher as defined by 20 U.S.C. 7801.

(B) Recruiting mid-career professionals from other occupations to become highly qualified career and technical education teachers.

(2) Program Authorized –

(A) GRANTS TO PARTNERSHIPS. – The Secretary is authorized to carry out the purpose of this subsection by awarding grants, on a competitive basis, to partnerships consisting of –

(i) (I) one or more institutions of higher education that provide that offers a career and technical education teacher preparation program; or

(II) another public or non-profit private entity that provides such professional development; and

(ii) one or more public agencies (including local educational agencies, State educational agencies, State human services agencies, and State and local agencies administering programs under the Carl D. Perkins Career and Technical Education Improvement Act of 2006 (20 USC 2302), or non-profit private organizations.

(B) Authorization of Appropriations – There are to be appropriated to carry out this paragraph such sums as may be necessary.

Highly Qualified Teachers

NASDCTEc strongly supports the Committee’s decision to maintain the High Objective Uniform State Standard of Evaluation (HOUSSE) policy. This policy is crucial to state efforts to recruit and maintain high quality teachers. We also strongly encourage the Committee to adopt the following non-regulatory guidance issued by the U.S. Department of Education on August 3, 2005 that defines a highly qualified career and technical education teacher:

“Highly Qualified Career And Technical Education Teacher: The term ‘highly qualified career and technical education teacher’ means a teacher that:

(A) does not teach core academic courses; and

(B) is not required to meet the definition of 'highly qualified' in paragraph 23 of this subsection."

Sec. 5421 – Elementary and Secondary School Counseling Programs

NASDCTEc firmly believes that a comprehensive career and academic counseling program is critical to ensuring that students and parents are receiving the information they need to make educated decisions regarding their futures. While we would like funding for this section of the law to be fully and adequately funded, this has not yet been the case. As such, due to a funding trigger currently within this provision, this important program has not been applied to secondary schools. We encourage the Committee to remove this funding trigger from the law by **striking Sec. 5421 (g) from the law.** We also advocate that the Committee to place a focus within this Title on not only academic or psychological counseling, but also comprehensive career counseling.

While NASDCTEc understands that this is only a discussion draft at this time, we are disappointed that the Committee did not seize the opportunity the reauthorization of the Elementary and Secondary Education Act represents to debate, and possibly implement, large-scale high school reform. This discussion draft does not make significant changes and represents only minor modifications to an education system that most experts believe needs major upgrades. NASDCTEc would like to see legislation that encourages dual and concurrent enrollment programs, student transitions from secondary to postsecondary education, and further integration of academic and CTE content and standards. We are hopeful that the Committee will continue the debate on high school reform in earnest and begin to implement the kind of changes that will be necessary to keep our nation educationally and economically competitive at the global level, and not simply pass moderate legislation quickly.

On behalf of the State Directors of Career Technical Education from each of our fifty United States, I thank you for the opportunity to comment on this important legislation. We look forward to working with the Committee closely in order to achieve the best reauthorization possible for our nation's students.

Sincerely,

J. Domenic Giandomenico
Director of Government Relations