Promoting a Regional Approach to the Perkins V 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 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.

One of the important decisions states will need to make as they implement this new requirement is how to structure the needs assessment development and submission process among eligible recipients. The law provides flexibility in conducting the needs assessment, creating opportunities for enhanced collaboration across intra-state regions for both the needs assessment and the local application.

States must determine whether each individual eligible recipient of Perkins funds will develop and submit a single CLNA or if eligible recipients will be allowed, or required, to collaborate on a regional approach that bridges secondary and postsecondary levels and regional labor markets. There are many variations within these two approaches, but whichever model is chosen, it will have major implications for the state role in the design and implementation of the CLNA and local application guidelines and in communications with the field.

> *Many states support regional consortia through their Perkins allocations, which can take multiple forms. For the purpose of this resource, the term* consortia *refers to secondary-postsecondary partnerships formed within a geographic region — similar to the consortia funded under the Tech Prep model in earlier Perkins legislation. The consortia discussed in this document do not refer to groups of secondary school districts or postsecondary institutions that come together due to their small size or rural nature to be eligible for a grant award, although those consortia would likely benefit from some of the same supports discussed here as they approach the CLNA.*

Section 1: Why a Regional Approach?

While no approach the CLNA process is inherently "best," a state might encourage or require regional collaboration for many reasons, ranging from those focused on program quality and alignment to more practical capacity considerations. The benefits outlined below can help you make your case to stakeholders and show how different approaches align with overall state goals.

Aligned Systems and Career Pathways

A regional approach to the CLNA can increase systems alignment and build stronger programs of study and career pathways for students. If all Career Technical Education (CTE) stakeholders in a particular region are reviewing the same programs and data — and making plans to address identified needs together — there can be more synergy around future plans that seamlessly connect secondary education, postsecondary education and the workforce. For example, by having a community college and its nearby local school districts work together on the needs assessment, gaps in course offerings between learner levels or supports that are needed to help students move from high school to postsecondary programs can be more easily identified. States can also embed collaboration for the CLNA within broader efforts to align education and workforce development systems on a regional basis.

Enhanced Coordination and Collaboration

Through a regional approach, partners can make more decisions collaboratively, rather than in competition with one another, and work together to identify best practices and allocate resources for a collective impact on common needs and shared metrics. Districts and postsecondary institutions can use the process to learn from each other as well, sharing information on the strategies that have worked to improve program quality and equity.

A broader, regional approach to the CLNA can also allow for a wider focus on business and industry needs across an entire region. Focusing on only the geographic area served by a single local recipient might result in missing regional labor market trends and gaps in the programs that are provided. A regional look can ensure that all economic and student needs are being met. For example, partners in a region can use results of the CLNA to make decisions that reduce duplication among program providers while still addressing a variety of regional labor market needs. Or regional partners may join together to invest in a common goal, such as working with an intermediary to facilitate work-based learning. Without regional discussions, these opportunities are more likely to be missed.

Streamlined Stakeholder Engagement

Practically speaking, a regional approach to the CLNA can reduce the duplication of effort for stakeholders. Business partners, community-based organizations and other stakeholders would be involved in only one

regional process, rather than being consulted by every local district and/or postsecondary institution in their area. Regionally coordinated stakeholder engagement is of particular benefit in rural areas, where the number of business partners and organizations is limited and where there are multiple smaller school districts in a single geographic area. A regional CLNA process would create a single point of contact for these stakeholders and lead to richer, more meaningful conversations as stakeholders would know they were speaking to the entire CTE community at once.

Such a regional approach also can reduce duplication for eligible recipients, as efforts to engage stakeholders, examine labor market information and evaluate program quality can benefit from economies of scale. Many small or rural school districts lack the capacity to complete a robust CLNA on their own; compiling resources across a region can make data-driven decisionmaking more effective. A regional approach can also harness diverse perspectives and engage individuals with different areas of expertise, and involving multiple eligible recipients can counter high staff turnover or help those newer to Perkins.

Targeted State Capacity

From a state perspective, regional CLNA approaches also can help address capacity issues, streamlining the logistics of implementing and supporting this new requirement and providing regional "hubs" for communication and technical assistance. These benefits might be particularly critical in states with very large numbers of eligible recipients, where providing support to each individual district or institution as it undertakes the CLNA process would be difficult for state leaders.

Section 2: Understanding Your Options

States can approach regional collaboration on the CLNA in a variety of ways — ranging from limited joint activities to consortia that are required to work together not only on the CLNA but also on the local application. This section will help you to think through each model and the range of options you have as a state.

One way to think about these different models is through the dual-axis framework visualized below. One axis describes how states might *support*, *incentivize* or *require* regional work. The other axis describes a continuum of increasing levels of regional engagement, leading to the full consortia model. It is important to note again that no single approach is "better" than another in a particular situation. A state's overall goals, program structure and current CTE environment should shape any decision about regional work.

Comprehensive Needs Assessment Regoinal Collaboration Framework

		Support	Incentivize	Require
Regional Approaches	**Consortia**	State provides guidance that allows and explains the process for a regional CLNA and combined regional applications.	State provides guidance and uses funding or other incentives (e.g., customized data, facilitation support) to encourage a regional CLNA and combined regional applications.	All eligible recipients are required to complete a regional CLNA and submit combined regional applications, with state guidance and support.
	Blended	State provides guidance that allows and explains the process for a regional CLNA.	State provides guidance and uses funding or other incentives (e.g., customized data, facilitation support) to encourage a regional CLNA.	All eligible recipients are required to complete a regional CLNA but submit individual local applications, with state guidance and support.
	Foundational	State provides guidance around ways in which eligible recipients could collaborate (e.g., coordinated stakeholder engagement, joint review of labor market data).	State provides guidance and uses funding or other incentives (e.g., customized data, facilitation support) to encourage regional collaboration for parts of the CLNA.	All eligible recipients are required to collaborate for parts of the CLNA (e.g., coordinated stakeholder engagement, joint review of labor market data) but submit individual CLNA results and local applications, with state guidance and support.

State Levers for Regional Collaboration

Regional Approaches (Y Axis)

Foundational Regional Collaboration: At the start of the continuum, states can encourage or require eligible recipients to jointly complete only one or more pieces of the CLNA, such as stakeholder engagement or labor market information review. Using a regional approach for these elements of the CLNA can yield some of the largest practical benefits, creating economies of scale and reducing duplication of effort.

This level of collaboration might be the best choice for states when:

- Resources and capacity, student population and/or program quality vary significantly from one recipient to another, necessitating different strategies among individual districts or institutions;

- There is a smaller number of eligible recipients, in which case states may not be as concerned about duplication of effort and burden and locals are already considering some regional information by default;

- The split of funds between secondary and postsecondary is skewed dramatically, which could negatively affect motivation to collaborate;

- The spread of institutions or partners is not even across the state, making organizing difficult in some areas; and/or

- The state wants to ensure that each eligible recipient maintains autonomy and that local equity gaps and program quality challenges are addressed at the institution level.

The most likely approach at this level of collaboration is regional collaboration focused specifically on labor market needs and broader stakeholder engagement, with locals conducting the more program-specific parts of the CLNA on their own and then submitting individual local applications. Using this approach might be described as a funnel, starting with a broad regional overview on labor market needs and collaboration with groups that represent regional business and industry and special populations. The funnel then tapers to a tighter local focus when considering program of study implementation and seeking additional community engagement from local educators, students and parents, and finally it narrows down to the local application.

Blended Regional Collaboration: Moving along the continuum, states can encourage or require the full CLNA to be completed and submitted by regional partnerships, but each individual recipient of funds would complete and submit its own local application. This model can reduce duplication, streamline the review of CLNAs by states and foster collaboration, while maintaining local accountability and control of resources. Strategies to address identified regional needs would be developed by and tailored to local districts' and institutions' specific populations and programs through the local application.

This level of collaboration might be the best choice for states when:

- The state wants to encourage a high level of collaboration around the CLNA, while maintaining accountability provisions at the eligible-recipient level;

- Student populations across institutions and districts within a region are significantly diverse and the state wants to ensure that local applications focus on supporting learners and closing equity gaps at the institution level;

- Some regional structures are already in place around which to build the local needs assessment process;

- State leaders want to streamline communication and technical assistance for the needs assessment, particularly if the number of individual eligible recipients is large; and/or

- The state is in the process of moving toward more regional collaboration in its CTE and/or workforce development systems and want to use the CLNA to facilitate this transition.

Regional Consortia: At the highest level of collaboration, states can encourage or require full consortia through which regional partnerships of secondary and postsecondary institutions together complete the CLNA and a single local application. This model would undoubtedly streamline the local burden and improve coordination and systems alignment to drive program quality, but if this approach is new for the state, it will require a significant amount of groundwork and support within the state to determine governance and shift local thinking.

This level of collaboration might be the best choice for states when:

- There is a statewide priority around fully aligned programs of study with seamless secondary and postsecondary connections;

- The state already has strong, agreed-upon regional structures in place focused on labor market alignment and/or career pathways;

- The state has a large number of eligible recipients, particularly if many of them lack administrative capacity;

- The state has a set of common education and workforce goals or industry priority areas that regions can collaboratively work toward for collective impact; and/or

- Disparities in program quality and student achievement within regions of the state are small enough to benefit from common activities.

State Levers for Regional Collaboration (X Axis)

Support Regional Collaboration: The first option is for states to allow or encourage regional collaboration by supporting regional work. This approach is likely the most politically expedient and can be appealing to states with a strong commitment to local control. However, it does limit the benefits that could be gained from more robust regional collaboration and will lead to more variation in local approaches to the CLNA. States can support such coordination through providing targeted guidance or technical assistance geared toward collaborative stakeholder discussions, making region-wide data available or even suggesting appropriate regions for collaboration.

Incentivize Regional Collaboration: Moving along the continuum, the next option is to incentivize regional approaches by offering financial support, such as through state leadership dollars or the reserve fund, or customized supports that are available only if recipients choose to pursue a regional approach. For example, **Tennessee** will use one-third of its reserve fund to support regional secondary-postsecondary collaboration through a competitive process. States might also agree to facilitate convenings to gather stakeholder feedback for recipients that choose to participate in a regional partnership.

Require Regional Collaboration: Finally, states can require eligible recipients to work together regionally using one of the regional CLNA models described above (foundational or blended collaboration or full consortia). In addition, Perkins includes other levers that states can pull to require regional collaboration, such as requiring each local recipient to review its region's labor market information in addition to state or local information during the CLNA process, requiring descriptions in the local application of how the eligible recipient's local programs complement those being offered across a region, requiring regional business advisory boards rather than individual program boards, and funding only fully aligned programs of study that are developed jointly across secondary and postsecondary education.

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Conducting a Self-Assessment: Which Model Makes Sense for Your State?

Consider the following questions to help you and your leadership team identify which approach will have the greatest positive impact in your state, which levers your state can use to implement that approach, and how to make the case to stakeholders.

- To what degree would eligible secondary institutions welcome collaboration with postsecondary institutions around the CLNA process and/or local application? To what degree would eligible postsecondary institutions welcome collaboration with secondary institutions around the CLNA process and/or local application? To what degree would workforce investment boards or similar entities welcome collaboration with the education system?

- Is your state embedding Perkins planning within a broader alignment of education and workforce systems, such as by submitting a combined plan for Perkins and the Workforce Innovation and Opportunity Act (WIOA)? If so, how will the state align the regional planning process required under WIOA with regional collaboration for the CLNA and/or local application?

- If you decide to move in a regional direction for the CLNA and/or local application, which stakeholders would support that decision? Which stakeholders would oppose it? How might you address concerns of stakeholders?

- Are any regional structures already in place in your state that could be used for regional collaboration?

- Are any entities or leaders within existing regions well poised to convene secondary and postsecondary eligible recipients? If not, how could this capacity be created?

- Does your state currently incentivize or require regional collaboration among secondary and postsecondary eligible recipients? Between the education and workforce systems? If yes, in what ways? How effective has the collaboration been to date?

- What resources does your state have that could be used to incentivize regional collaboration around the CLNA and/or local application?

- What is the current state capacity to support an individual CLNA and/or local application for each individual eligible recipient? How could regional collaboration reduce the burden at the state level?

- What is the current capacity of each of your local recipients to conduct robust CLNA processes and connect the results to local applications? How could regional collaboration enhance that capacity?

- Would requiring a regional approach to the CLNA and/or local application require any policy changes in your state outside Perkins? If so, what are the political and practical challenges to making those changes?

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Section 3: Implementation Considerations

Whether a state chooses to support, require or incentivize CLNA collaboration, local recipients will need guidance to shift their thinking and navigate the programmatic and practical issues that arise with working regionally. States will need to work through a number of specific issues to design a meaningful regional CLNA process, including those outlined below.

Identifying or Organizing Regions

To start, states must decide how to organize the eligible recipients and partners regionally. There are a number of potential regional organization models, such as community or technical college service areas, education service center regions, workforce development areas, economic development regions, or other state-designated areas related to education or workforce development. The challenge, of course, is that none of these regions likely align with each other. Population disbursement, location of educational institutions, data availability, who has convening capacity and regional labor market shape should all factor into the decision. In addition, states looking to better align Perkins and WIOA should consider whether to use WIOA regions to organize or how to coordinate assessment and planning activities across WIOA regions and the regions selected for the Perkins CLNA.

Different states will likely come to different conclusions about the appropriate regions and may want to consider whether a mix of models that provides more flexibility to locals would be appropriate — especially if the state is merely encouraging or incentivizing a regional approach. If flexibility is offered, basic guidelines should still be provided around suggested numbers of partners, secondary-postsecondary participation and how to involve stakeholders, particularly in states that have both secondary-postsecondary and rural consortia. In **Wisconsin,** for example, a regional effort to lift up 9-16 career pathways leverages both regional economic development organizations and cooperative educational service agencies to coordinate the efforts, depending on the region of the state.

Key Questions to Consider:

- Will you use an existing geographic regional structure or create a new one?
    - If existing, which structure will you choose?
    - If new, how will you assign eligible recipients to regions?
- If you already have some rural consortia, how will they be incorporated into the structure?
- Will you allow for multiple models to provide more flexibility for locals? If so, what guidelines will you provide to ensure that all eligible recipients across the state have coverage and that there is some consistency in the experiences and outcomes from each regional model?

- How will you handle eligible recipients that wish to change regions or other realignment issues?

- What guidance will you provide on stakeholder participation at the regional level, particularly around employers that span multiple regions or entities (such as workforce development boards) that may not be uniformly distributed across regions?
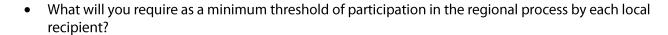
Governance

Governance and administrative issues are key considerations with any of the models described above. States may decide to designate a single eligible recipient as the "lead" of the region; for example this lead could be the largest recipient in the area or the postsecondary institution, if the state is using community college service areas to organize. Alternative approaches include designating both a secondary and postsecondary provider as "co-leads" of the work or giving regions the opportunity to select their own lead agency. Who serves as the lead will likely depend on the current players and the approach selected by the state. A third-party entity or workforce board may serve as the lead if the state chooses a foundational or blended collaboration model but should probably be an eligible recipient if the state selects a full consortia model to ensure compliance with federal statute.

If full regional engagement around the local application is encouraged or required, decisions about which entity controls or manages funding decisions will also be critical. If regions lack agreed-upon decisionmaking rules and processes, there will likely be confusion about fiscal responsibilities. State leaders should clearly articulate the roles and responsibilities of the state, consortia and individual districts and institutions before embarking on robust regional models. In addition, states should decide who physically submits the CLNA and signs the local application, as well as what evidence of local participation will be required.

Key Questions to Consider:

- Will you select leads of each region or allow the regions to determine their own leads? If regions will select their own leads, what guidance will be provided?

- What criteria will be used to select regional leads (either by the state or locals)?

- What are the roles of the regional lead: Convener? Fiscal agent? Data aggregator? Technical assistance provider?

- How will the CLNA and local application be submitted and by whom?

- Who will sign the local application if a full consortia model is used? The consortium lead or all of the individual districts and institutions within the consortium?

- What will you require as a minimum threshold of participation in the regional process by each local recipient?

Providing Data

Irrespective of the structure of the CLNA, the state has a significant role to play in providing data to eligible recipients. With a regional approach, states should ensure that the labor market data provided are at a regional level that matches as closely as possible to the geographic region chosen as an organizing framework. If an exact match is not possible, regional partners will need additional support to pull in other data sources to ensure that all areas in the region are represented.

Student performance data will also need to be provided at the regional level but should be disaggregated by individual providers and programs to ensure that low performance in one area is not masked by higher performance in another area.

Key Questions to Consider:

- How is labor market information in your state currently structured? What changes are needed to make it useful at the regional level?

- How will you provide both aggregate regional performance data and locally disaggregated data for review?

Ensuring Accountability

As mentioned above, program quality and student outcomes of individual eligible recipients, particularly small ones, could be masked if the only information considered is at the regional level. At higher levels of regional collaboration, states must determine how to maintain accountability for local programs and recipients. Options to consider include using public reporting to shine a light on individual institutions and districts or providing guidance on how disaggregated data must be reviewed and used in the development of the CLNA and local application.

Key Questions to Consider:

- How will you ensure that disaggregated data are used in the development of the CLNA and local application?

- How will you define a process or provide tools for data analysis for each region?

- How will you collect, aggregate and publicly report accountability data from regional partners to ensure that individual population or program performance is not masked?

- How will you monitor program quality within regional partnerships?

Facilitation Supports

The work of pulling together disparate partners with differing priorities will not be easy for many local leaders, and states should be prepared to provide training, technical assistance and even outside facilitation to support regional work. Regional leads in particular will need additional training on managing the CLNA process and engaging partners. Ideally, direct, in-person support should be provided to each region, with either state staff or outside experts available to facilitate conversations or aid in decisionmaking. If that support is not possible, then at a minimum, sample level-setting tools, guiding questions and repositories of resources should be developed within the regional framework.

Supports are particularly important to ensure that as the regional "tent" gets bigger, specific populations' voices do not get lost in the discussion, particularly those of traditionally marginalized communities. Regions will need to examine structural inequities and make space for input in multiple ways, times and venues to ensure that all voices are heard. In addition, more progressive local leaders may pull back from being bold to reach agreement with more traditional leaders. State-provided or state-supported facilitation can be especially helpful in pushing the region toward bold new ideas rather than accepting the least common denominator across programs.

Finally, states can also play a role in connecting stakeholders at a regional level by identifying potential partners in specific areas that should be involved, providing contact information or issuing invitations, and using state partners — such as agencies working with out-of-school youth, homeless individuals or vocational rehabilitation — to help with those connections.

Key Questions to Consider:

- What training will be provided to regional leads? What supports will be available to them throughout the CLNA and local application process?

- Will you help regional leads host or organize regional meetings?

- Will facilitators be provided to each region? Who will serve as facilitators?

- What sample tools and resources will be provided to each region?

- How will you assist in identifying potential partners and stakeholders within the region?

Funding

In addition to using funds to incentivize a regional approach, states should consider whether to use funding for regional partnership activities. These sources could be state administrative funds, state leadership dollars or reserve funds, as well as state-specific sources of funding. States may also be able to

leverage funds from the workforce development system, particularly states that are using Perkins V to substantially increase systems alignment with WIOA service providers.

Funds could be used to provide stipends for travel or release time for local recipients, hire facilitators to support regional convenings, and offer additional support to the lead institution in each region. For example, **Kansas** is providing state leadership dollars to offset travel costs for Perkins coordinators to attend regional meetings, and **Louisiana** is using its reserve fund to provide additional resources to the institutions responsible for overseeing the CLNA and local application development within each region.

Key Questions to Consider:

- How can you use Perkins or other funds to support regional activities? Will regional leads receive direct funding?

- Will funding be provided only to the regional lead to use or allocate or will individual recipients also receive direct funds to support their involvement?

Sample List of Decision Points

For each of the nine models identified in the table on page 4, states will need to work through the considerations described above in slightly different ways. The following is an example of how decisionmaking around one particular model might play out.

Model: Requiring a Blended Approach
In this model, all eligible recipients are required to complete a regional CLNA but submit individual local applications, with state guidance and support. Actions states should take or facilitate include:
- Selecting existing geographic regions or identifying new ones;
- Assigning eligible recipients to regions or developing a process for recipients to organize themselves and creating a procedure to allow recipients to change regions, if desired;
- Assigning business and community stakeholders to regions, if desired;
- Determining the process by which regions will submit the CLNA results; and
- Developing a protocol for translating regional CLNA findings into individual local applications.

In addition, states may support the process by:
- Selecting a lead in each region;
- Facilitating regional convenings;
- Providing tools and/or training for facilitation;
- Providing regional labor market information and regional and program-level performance data; and
- Providing funding to support the regional CLNA process.

Conclusion

There is no right or wrong approach to the CLNA when it comes to regional collaboration, but considerable thought must be given to pros, cons and structural considerations at the beginning of the process. This document can help you identify which model will be the best fit for your state and ensure that regional collaboration positively affects systems alignment, program quality and administrative efficiency.

Regardless of which approach is chosen, it is important to keep in mind the overall goal of the CLNA, which is to identify the priorities that will drive the local application and local funding decisions under Perkins V, ensuring more strategic use of federal dollars and an overall increase in CTE program quality and equity. For each of the regional collaboration models, local recipients will need guidance to connect the results of the CLNA to the local application to ensure that the results are meaningful and actionable at the local level.