

# Mitigating Unanticipated Circumstances:

## Resetting Perkins V State Determined Performance Levels During the COVID-19 Pandemic



The 2020-21 school year began the full implementation of the Strengthening Career and Technical Education for the 21st Century Act, known as Perkins V, and is scheduled to be the first year of official reporting on the new indicators included in the law. However, the continued uncertainty created by the COVID-19 (coronavirus) pandemic has created significant concern among Career Technical Education (CTE) leaders related to Perkins V accountability and data reporting. This resource is designed to help state leaders analyze the impact of the coronavirus pandemic on their CTE student performance levels and then use the flexibility provided in Perkins V to adjust related performance targets as necessary.

### Perkins V Context

Perkins V introduced new federal CTE performance indicators, requiring new baseline performance levels. The law also included formal definitions of “CTE concentrators.” These changes required nearly all states to shift how they collect data and which students are included in each measure when calculating performance levels.

Additionally, Perkins V made significant changes to the way states set and modify performance targets. Previously, states negotiated a target performance level on each core indicator of performance with the U.S. Department of Education (ED). Now, states set their own state-determined performance levels (SDPLs) following specific criteria and processes outlined in the law. One of the key parts of this process is that states must make available their suggested performance targets for public comment at least 60 days before submitting them to ED. States also have to ensure that their targets advance the goals set forth in their state plans and that they continually make meaningful progress in the performance of all students.<sup>1</sup>

## The Impact of the Coronavirus

The coronavirus pandemic is an unanticipated circumstance that is negatively affecting CTE students and the collection of data. Specifically:

- The instructional shifts at the end of the 2019-20 program year disrupted the baseline year data collection;
- Educational delivery has been inconsistent, with educational providers often moving between virtual, hybrid or socially distant in-person learning;<sup>2</sup>
- Certain industries have been disrupted, affecting education-employer partnerships, experiential learning opportunities, and the ability of students to get jobs after completing CTE programs;<sup>3</sup> and
- Postsecondary enrollment rates have decreased for the 2020-21 academic year<sup>4</sup> as unemployment rates have increased.<sup>5</sup>

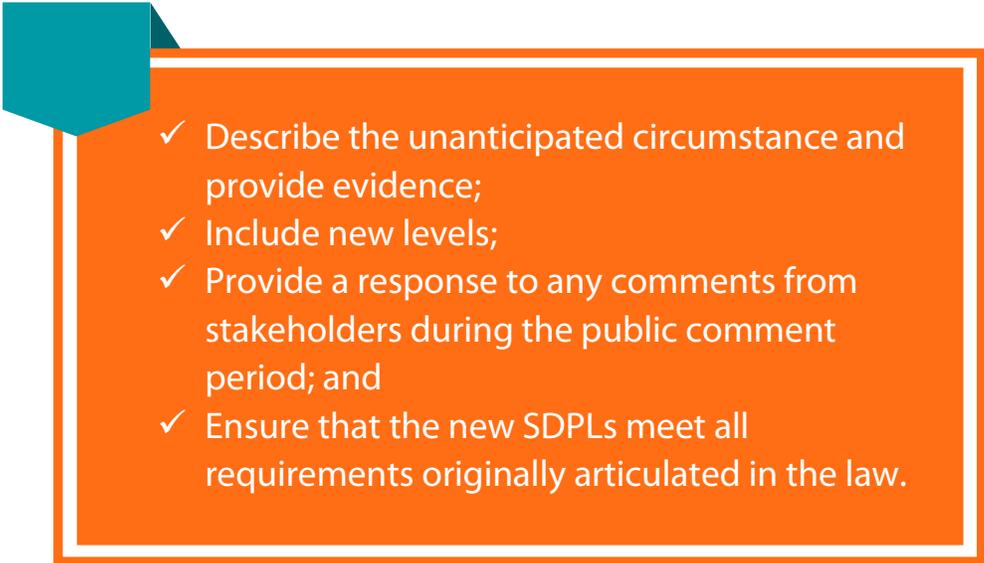
The current educational and economic situation is much different from the environment states faced when they set their original SDPLs. With that in mind, there are two opportunities built into the law to amend these original targets. First, states can revise their SDPLs for any reason between the second and third program years. In addition, states can redefine their performance levels if unanticipated circumstances arise. In the case of an unanticipated event — such as a natural disaster, a change in the state data system or, in this case, a pandemic — states may revise their SDPLs for one or all program years, hold another public comment period, and resubmit those new levels to the ED secretary for approval.

However, if a state fails to meet at least 90 percent of the SDPL on an indicator for the program year, the state must create an improvement plan for that indicator following requirements from ED. Once a state enters an improvement plan, no adjustments may be made to the performance levels for the indicator.<sup>6</sup>

## Revising SDPLs

The Office of Career, Technical, and Adult Education (OCTAE) within ED has released guidance to states on how they might submit revised SDPLs under the unanticipated circumstances clause of the law as part of the annual state plan revision process, which must be completed by May 21, 2021.<sup>7</sup>

This guidance memo, dated January 15, 2021, underscores that any new performance levels must undergo the public comment process as originally required. To submit new SDPLs, the state must:

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- ✓ Describe the unanticipated circumstance and provide evidence;
  - ✓ Include new levels;
  - ✓ Provide a response to any comments from stakeholders during the public comment period; and
  - ✓ Ensure that the new SDPLs meet all requirements originally articulated in the law.

This paper provides an overview of four steps states can take to decide whether and how they might revise their performance targets as a result of the pandemic.

**Quantify the impact:** States should gather as much information as possible to determine how the performance of CTE learners will be affected by the pandemic. Data sources may be limited due to the timing of Perkins V implementation, the lack of information during the pandemic and uncertainty about the future. However, preliminary data from small sample surveys, formative assessments, labor market projections, qualitative interviews and other means can help state leaders estimate, to the best of their abilities, how the pandemic will affect future performance indicators.

**Explore options:** Whether or not states decide to revise their SDPLs will depend on the likelihood that they will miss their targets, the anticipated effort to revise the SDPLs, and the consequences of missing targets. States can take two paths:

- Stay the course and keep existing SDPLs. This option may be best for states that do not expect to miss their targets or do not have capacity to revise them, but these states also risk missing their targets and entering into an improvement plan.
- Revise and resubmit. This option is the safest because it minimizes the risk of missing targets, but it may be challenging for states to identify reliable data to make projections, conduct another public comment process, and communicate to the public why adjustments are necessary.

**Revise targets:** If a state decides to revise its SDPLs, the next step is for state leaders to gather evidence; determine whether to revise targets for the 2020-21 program year alone or additional years; and estimate, to the best of their abilities, achievable targets. States can project future performance using prior year data (including comparable data from the Great Recession), estimates from Every Student Succeeds Act (ESSA) or Workforce Innovation and Opportunity Act (WIOA) partners, statistical adjustment models used under WIOA or projections from peer states.

**Engage the public:** Finally, states should be proactive and transparent in engaging stakeholders and the public about changes to Perkins V SDPLs. The law requires states to get public input before revising their SDPLs, but they should also engage state partners, policymakers, industry leaders and others to get input, share information, and coordinate with other coronavirus-related adjustments to education and workforce programs. States should consider three key points in their communications strategy: (1) Set expectations and explain decisions; (2) re-emphasize prior commitments to equity and quality; and (3) highlight opportunities.

### Key Dates for SDPL Revisions

- **March 1, 2021** (suggested) — States assess the impact of the coronavirus pandemic on SDPLs and decide whether to revise performance targets.
- **March 1-19, 2021** (suggested) — States consider prior year data, economic outlook and current data to determine realistic adjustments for SDPLs.
- **March 22, 2021** (60 days before revised state plans are submitted) — Targets posted for public comment.
- **April 21, 2021** (suggested) — Public comment period closed. States review comments, make adjustments and/or respond to comments.
- **May 21, 2021** — Revised state plans due. States must submit budgets for program year 2021-22 and may submit a revised plan narrative and/or updated SDPLs with evidence and responses to public comments.<sup>1</sup>
- **January 2022** — 2020-21 Consolidated Annual Report (CAR) submitted.
- **Spring 2022** — States can choose to revise performance targets for additional years if they are not in an improvement plan.

## Quantify the Impact

Every state is experiencing “unanticipated circumstances” due to the coronavirus pandemic. The question each state leader must address is to what degree their SDPLs are likely to be affected by the shifts in instruction and the economy that have occurred over the past year. This question is difficult to answer for many reasons, including the timing of the pandemic coinciding with the beginning of Perkins V and other shifts in performance measures and definitions, resulting in no valid baseline data in some states; the lack of information on the impact of campus closures on student performance; and the uncertainty about the timing of a return to more normal operations and the long-term economic impact of the pandemic.

### Data Sources

Despite these challenges, states should gather as much information as possible in an attempt to determine how the performance of CTE students will be affected by the pandemic before moving forward in the decisionmaking process. Here are a few resources you can access:

- **Formative assessments:** Formative assessments are low-stakes tests used in the classroom, not for accountability purposes but to monitor how learners are progressing throughout the year. If local recipients have been using formative assessments in the classroom, this information can help you evaluate whether learners are on track in developing academic and technical proficiency.
- **Small sample data:** Gathering data from a small sample of districts and colleges can provide a snapshot of CTE performance without the burden of a large-scale data collection. Consider engaging a geographically and demographically diverse group of Perkins local recipients to conduct a small-scale data collection and evaluate the degree to which learners are on track to meet performance targets.
- **Spring 2020 performance data:** While the 2019-20 program year’s data collection may have been disrupted (and no Perkins reporting was required), any information you have can still give you an understanding of how the coronavirus began to affect instruction and help you predict outcomes for the 2020-21 program year.
- **Postsecondary enrollment and financial aid data:** The National Student Clearinghouse’s fall 2020 postsecondary enrollment dashboard — filterable by state, institution and learner demographics<sup>8</sup> — as well as the national Free Application for Federal Student Aid (FAFSA) completion and submission tracker can help you evaluate the pandemic’s impact on postsecondary enrollment in your state.<sup>9</sup>
- **Labor market data:** Consider reaching out to your state’s labor and workforce agency to access information about unemployment trends overall and by industry. This information can help you make projections for post-program placement and work-based learning.

- **Qualitative data from practitioners and partners:** Often, your best information is going to come from practitioners on the ground. They will have the best understanding of how learners are doing and how employers are feeling. Consider organizing focus groups or key informant interviews with your most data-savvy local CTE directors.
- **Industry certification and licensure data:** You may be able to access early data on credential attainment through partnerships with credentialing bodies or agencies that issue state licenses. This information can help you determine the impact on credential attainment for CTE students in your state
- **State budgets:** State investments in CTE and career development will also have a direct impact on CTE enrollment and performance. Talk to your legislative liaison to see if cuts to CTE, dual enrollment programs, industry credential incentives, etc. are expected.
- **Public reports and news articles:** Although not necessarily scientific, monitoring public reports and news articles can help you get a read on how the economy is doing, how the pandemic is affecting instruction and how stakeholders are feeling.

### Considerations for Projecting Enrollment Figures

Additionally, while the pandemic will likely affect learner performance in CTE, changes in instruction and delivery of CTE programs may also affect the number of learners who enroll or concentrate in CTE. Consider how the following might affect your enrollment data for both secondary and postsecondary populations, which in turn affects the number of students that will be included in the denominator of your performance measures and your overall performance:

- How has overall enrollment changed in your CTE programs? How many learners have left the system (homeschooled, absentee, dropped out or stopped out, etc.)?
- Has the number of learners enrolled in upper-level (i.e., concentrator-qualifying) courses decreased?
- Have postsecondary retention rates changed? There could be significant long-term impacts from lower enrollment and shorter-term impacts from lower retention rates.
- How does online enrollment affect concentrator status? Which online courses count toward a program or program of study? Are schools and institutions able to offer the courses and/or experiences students need to become concentrators or complete programs?

- If you have a significant change in the number of concentrators, have the demographics of the remaining learners shifted, or is the change being felt proportionately across learner groups?
- Are the changes in numbers of concentrators significant enough to affect the variability of performance? For example, if total enrollment numbers drop significantly, then performance indicators will be influenced by a smaller population of learners.
- Are learners switching career pathways as a result of the pandemic (e.g., shifting to essential sectors or to programs that are more easily completed remotely)?

Table 2 in the Appendix expands on these data sources and considerations to explore how each performance indicator might be affected by the coronavirus pandemic. The Appendix outlines key questions, considerations and data sources you can draw from as you consider whether or not to adjust specific targets.

Note that these data sources can also be used as evidence for adjusting SDPLs when you share revised targets for public comment and in your submission to OCTAE.

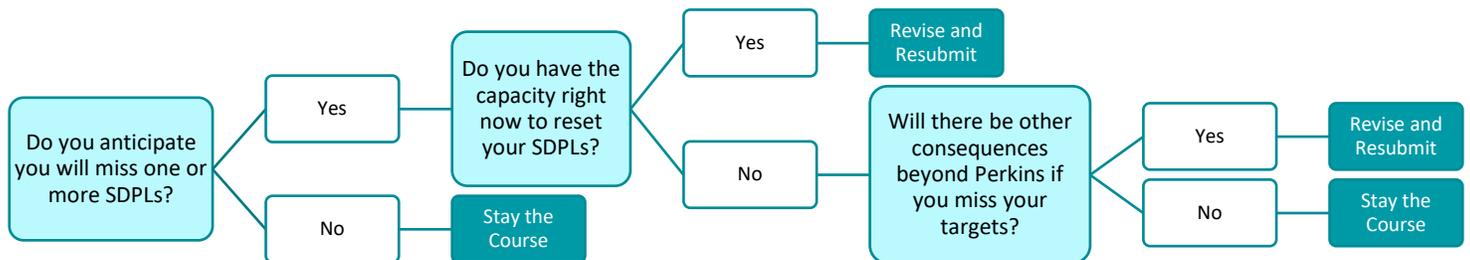
## Explore Options

Revising targets requires capacity and effort, which is in limited supply. But failing to meet targets could force a state into an improvement plan and lock it into its current targets for years to come. Amid all this uncertainty, should states attempt to revise their targets or stay the course? Whether or not you decide to revise your targets should depend on three things:

- Your assessment of the likelihood that you will miss your current targets (see Section 1);
- The anticipated effort to revise them; and
- The cascading consequences — both statutory and perceived — of missing your targets. For example, would missing targets affect state accountability requirements, future funding opportunities, relationships with partners or public perception?

Figure 1 is designed to help you evaluate your circumstances and understand your options for revising performance targets. Each path is described in more detail below.

Figure 1: Decision Tree for Resetting SDPLs



### Path 1: Stay the Course

States that set conservative SDPLs or are not expecting student performance to fluctuate significantly might determine that they are not likely to miss their SDPLs. After evaluating the metrics in Section 1 and projecting outcomes for the 2020-21 program year, you may choose to stick with your current targets.

In addition, if you evaluate the metrics and believe you are at risk of missing targets but have limited to no capacity to revise targets and coordinate a public comment process, you may also decide to stay the course and risk missing targets in the 2020-21 program year. Taking this risk may mean having to complete an improvement plan for each target that is under the 90 percent safe harbor threshold. Under Perkins V, if a state has an improvement plan for any one performance indicator, it cannot make adjustments to the SDPL for that indicator.

In this scenario, weighing the cost of revising your SDPLs now compared to the cost of creating an improvement plan later is important. While the improvement plan itself may not be overly burdensome, you should also consider other non-federal consequences.

As the pandemic progresses, Congress or ED may release additional guidance, flexibility or even waivers that could ease the accountability burden, but these are impossible to predict at this point and add another element of risk.

#### *Pros*

- Requires less work for your state up front.
- Frees up capacity to support schools, districts and colleges.

#### *Cons*

- You run the risk of misjudging your state's current performance and missing your targets.
- If you miss your targets, the effort required to write and implement an improvement plan might be comparable to the effort required to revise SDPLs.
- There may be other non-federal consequences (such as state accountability, future funding opportunities, relationships with partners or public perception).

### **Path 2: Revise and Resubmit**

The other path states can take is to revise and resubmit their SDPLs. Given the uncertainty around the pandemic, limited access to data and inconsistent delivery of CTE programming, this path is by far the safest option from an accountability standpoint. If your state is at risk of missing at least one of its performance targets based on the metrics in Section 1, you should consider going through the target revision process.

#### *Pros*

- Minimizes the risk of missing targets, entering into an improvement plan and getting locked into targets for future years.
- Takes the pressure off of local practitioners, allowing them to focus on learner success.
- Still allows you to go back and increase your targets to more ambitious ones at a later date.
- Helps you get ahead of public messaging and shape the narrative about Perkins V performance during the pandemic.

#### *Cons*

- Requires the capacity to recalculate targets and conduct the public comment process.
- Requires data that may be difficult to find to make informed projections.
- Involves engaging stakeholders, who may be less inclined to participate so soon after the initial SDPL public comment period.
- May give stakeholders the impression that you are walking away from prior commitments and lowering expectations for CTE.

## Revise Targets

If a state determines that it is at risk of missing its SDPLs and decides to reset them, the next step is for state leaders to model, to the best of their abilities, achievable revised targets. Between the pandemic and the new Perkins V concentrator and indicator definitions, states will likely need to take an educated guess to set realistic performance targets. This section outlines a few strategies and methods to help you make the best possible educated guess.

### Step 1: Gather Evidence

Using the information you gathered in Section 1, try to quantify the impact that the pandemic will have on each of your indicators. Many indicators — such as post-program placement — likely will decrease as a result of the pandemic, but the trick is estimating by how much. Do you need to adjust for a decrease of 2 percentage points or 10?

Making an educated guess may require gathering and reviewing information from multiple sources. The more information you use to quantify the impact, the better your estimate will be when you ultimately decide to revise your SDPLs.

### Step 2: Decide Which Years to Revise

Under Perkins V, states projected targets for the full four-year implementation timeline. States have the opportunity to revise targets again before the third program year (or at any time due to unanticipated circumstances), so the door is open to adjust targets at a later date. You may choose to adjust your SDPLs only for the 2020-21 program year and wait and see before you decide to revisit future annual targets.

Consider:

- Whether impacts from the pandemic are projected to extend beyond the current program year;
- Whether cuts are going into effect that will have an impact on future budget cycles; and
- Whether you will have capacity in future years to adjust targets again or if you will save time and effort by adjusting all targets at once.

### Step 3: Estimate Performance Outcomes

Finally, once you gather your data and determine which years to revise, use the information at your disposal to project future performance and estimate your targets. During the Perkins V planning period, states took a few different approaches to setting their initial SDPLs:<sup>10</sup>

- **Make projections using prior year data:** To develop their original four-year targets, many states simulated performance by applying new rules and definitions to prior data. While most states looked at two or three years of data, some were able to access a decade or more, enabling them to make even stronger projections. While prior year data do not account for the coronavirus pandemic, you could evaluate data from the Great Recession to see how the economy affected postsecondary placement, employment, non-traditional enrollment and other indicators, keeping in mind that so far, postsecondary enrollment during the pandemic has not followed the trends of the Great Recession.
- **Align with ESSA and WIOA targets:** Many states relied on their existing ESSA and WIOA targets to set SDPLs under Perkins V. Indicators such as graduation rate, academic proficiency, and in some cases, work-based learning and dual credit attainment align directly with ESSA indicators. For WIOA, aligned indicators include post-program employment and credential attainment. You should coordinate with your counterpart agencies to ensure that targets are aligned and adjustments are reflected consistently across programs.
- **Leverage the WIOA statistical adjustment model:** WIOA requires states to set targets for performance measures and then revise their goals to reflect changes in economic conditions and participant characteristics. To help states develop rigorous, attainable targets, the U.S. Department of Labor developed a statistical adjustment model to produce goals that demonstrate statistically significant progress and are contextualized according to the conditions of the state.<sup>11</sup> Such an approach may be useful to project how changes in economic conditions will affect your future performance goals.
- **Compare with similar states:** Perhaps the simplest approach to estimating performance targets is to simply talk to peer states. Perkins V encourages state leaders to examine SDPLs in similar states when setting targets, and the same approach can work during the pandemic. Economic and public health conditions are likely to have a regional impact, so working together with a border state may help you access, evaluate and understand data in a different context.

As you estimate your outcomes, consider how disparate impacts across communities — such as those with large rural populations, widespread remote learning, large numbers of learners from low-income families, and/or large numbers of learners of color — will be aggregated in your statewide total.

## Engage the Public

Whatever path states choose, communicating proactively and transparently about the decisionmaking process and how stakeholders will be affected is important. Doing so can help states set expectations with the public, control the narrative about CTE, and keep focus on what matters most: ensuring learner success and economic opportunity during the pandemic and beyond. Additionally, shifting the emphasis for data collection from accountability to learner support can ensure that, without the concern for hitting performance targets, local recipients can focus on using data to direct resources and support to the learners who are most affected by the pandemic.

Perkins V requires states to get public input before they submit revised SDPLs. However, you would be wise to deploy a more targeted and expansive stakeholder engagement strategy. Table 1 below includes recommended stakeholder groups and strategies for engaging each in the process of resetting Perkins V performance targets.

**Table 1: Key Stakeholder Groups**

Stakeholder Group	Engagement Strategy
State agency partners	<ul style="list-style-type: none"> <li>- Inform them of the decision to update SDPLs.</li> <li>- Request additional data to inform target revisions.</li> <li>- Coordinate around ESSA/WIOA accountability decisions to ensure alignment.</li> <li>- Coordinate public communications with the agencies' communications departments and leverage existing outreach channels.</li> </ul>
State policymakers	<ul style="list-style-type: none"> <li>- Inform them of the decision to update SDPLs.</li> <li>- Engage them in the process for approving revised SDPLs (e.g., if state board of education approval is necessary).</li> </ul>
Families and learners	<ul style="list-style-type: none"> <li>- Explain how the pandemic is affecting the delivery of CTE and why your state is revising performance targets.</li> <li>- Give them the opportunity to provide public comment.</li> </ul>
Industry partners	<ul style="list-style-type: none"> <li>- Reach out to understand how the pandemic is affecting their industries and their ability to support CTE programming.</li> <li>- Give them the opportunity to provide public comment.</li> </ul>
Practitioners	<ul style="list-style-type: none"> <li>- Reach out to understand how the pandemic is affecting local CTE programming and learner success.</li> <li>- Inform them of the decision to update SDPLs and what this means for local targets.</li> <li>- Give them the opportunity to provide public comment.</li> </ul>

### Crafting a Public Narrative

You can support your stakeholder engagement work by crafting a cohesive and simple story to explain your decisionmaking and reassure your stakeholders of your commitments to quality and equity in CTE. By developing messaging and talking points for key partners, you can ensure that you are communicating consistently and coherently with the field.

Your communications strategy will depend on the path you choose in Section 2. However, whether you decide to reset your SDPLs or not, being proactive and explaining your thinking to the public in a clear and concise way will help. Consider using these three steps to communicate your decisions to the public:

1. Set expectations and explain decisions.
2. Re-emphasize your commitments.
3. Highlight opportunities.

For example, consider the following messages if your state chooses to revise and resubmit:

1. **Set expectations and explain decisions:** “This is an atypical year due to the pandemic and the economic crisis, so we have decided to provide relief to our districts and colleges this year by revising our Perkins V performance targets.”
2. **Re-emphasize your commitments:** “This decision does not in any way mean that we are backing away from our commitment to equity, access and quality in CTE. Adjusting our accountability targets, however, will allow us to focus on what matters most: ensuring learner success and economic opportunity during the pandemic and beyond.”
3. **Highlight opportunities:** “CTE provides a critical lifeline to those that have been most affected by the pandemic. By taking the pressure off accountability, our state can focus on connecting learners with high-quality career pathways.”

## Conclusion

In the years leading up to the passage and implementation of Perkins V, states made incredible commitments to improving the quality of CTE programs and ensuring equitable access and success for each learner. The coronavirus pandemic presents states with unanticipated and unprecedented circumstances that threaten to disrupt this momentum. In light of these circumstances, states should consider taking advantage of Perkins V's flexibility to revise performance targets to provide relief to an embattled CTE system and allow state and local leaders to prioritize learner supports. Such a move does not mean that states should back away from their commitments to quality and equity nor that they should stop collecting data on learner performance. Rather, adjusting performance targets allows states to focus on using data to identify and support the learners who are most affected by the pandemic. This resource includes steps and strategies to help states quantify the impact of the pandemic, explore options, revise targets and engage the public.

## Appendix

Table 2: Considerations and Data Sources for Revising Perkins Accountability Indicators

Considerations	Potential Data Sources
<b>1S1/1S2: Four-Year and Extended-Year Graduation Rate</b>	
<ul style="list-style-type: none"> <li>• How are your ESSA partners approaching this measure? Since the Perkins V measure should be parallel to the ESSA measure for all students, aligning your approach is important.</li> <li>• When will early data on this indicator be available? Are there leading indicators you can review in advance?</li> <li>• Has your state made any changes to the requirements for graduation, such as waiving mandatory assessment scores, that could affect these rates?</li> <li>• Has your state decided to extend the academic year or offer additional summer learning opportunities to help students catch up and graduate? How will this affect the timing of your data collection?</li> <li>• What are the long-term considerations? Students closer to graduation may be more likely to complete, but the impact on ninth and 10th graders could be larger. It is important to consider not just the immediate impact on graduation rates but future impacts as well.</li> </ul>	<ul style="list-style-type: none"> <li>• Enrollment/attendance</li> <li>• On-track/early warning indicators</li> <li>• Student grades</li> <li>• Required exam scores (if applicable)</li> </ul>

Considerations	Potential Data Sources
<b>2S1: Academic Proficiency</b>	
<ul style="list-style-type: none"> <li>● How are your ESSA partners approaching assessments? Is your state applying for any ESSA waivers or still expecting to deliver assessments as planned? Since the Perkins V measure is based on ESSA assessments for all students, aligning your approach is important. States that receive waivers for ESSA assessments may code their Perkins data as -1 in their CAR for the year covered by the waiver.</li> <li>● Do you have reliable baseline data, or are you using new assessments (e.g., science)?</li> <li>● Do you expect full participation in assessments? If not, how does this affect different student groups?</li> <li>● If consequences are removed from assessments, such as if requirements for high school graduation are waived or colleges no longer require test scores for admission, is student motivation affected?</li> <li>● What are the long-term considerations? If your students take these assessments early in their high school career, but results are held and reported the year they exit, your data for 2020-21 may not be significantly affected, but future years will be.</li> </ul>	<ul style="list-style-type: none"> <li>● Formative assessments</li> <li>● Research studies on student performance loss</li> </ul>

Considerations	Potential Data Sources
<b>3S1 &amp; 1P1: Post-Program Placement</b>	
<ul style="list-style-type: none"> <li>• How are employment rates trending in your state — rising, falling or stable? Are there variations by region, industry, level of education or age?</li> <li>• How do your state WIOA partners anticipate the pandemic will affect their performance outcomes?</li> <li>• Secondary only: What do postsecondary enrollment rates look like in your state? Do they vary by institution level, program or region? How are FAFSA completion rates?</li> <li>• Postsecondary only: What do postsecondary transfer rates look like in your state? Do they vary by program or region?</li> <li>• Do you have current economic data or only data from the beginning of the pandemic? Are any future projections available?</li> </ul>	<ul style="list-style-type: none"> <li>• Unemployment rates (including by Career Cluster®/sector)</li> <li>• Economic forecasts</li> <li>• Postsecondary enrollment rate (including National Student Clearinghouse data)<sup>12</sup></li> <li>• Leading indicators such as FAFSA completion rates, college applications and job ad placements</li> <li>• Early participation rates in apprenticeships, service programs</li> <li>• Prior data from the Great Recession</li> </ul>
<b>4S1 &amp; 3P1: Non-Traditional Program Concentration</b>	
<ul style="list-style-type: none"> <li>• Have you had to cancel outreach or recruitment activities (such as camps or career awareness activities) that generally draw enrollment to non-traditional programs? These cancellations could affect data in the future as well.</li> <li>• How has enrollment in programs and concentrator-level courses changed?</li> <li>• Has your CTE program mix changed? For example, if you have had to close some programs due to safety issues or the inability to offer them remotely, this situation could affect your denominator.</li> </ul>	<ul style="list-style-type: none"> <li>• Student enrollment by program/Career Cluster</li> <li>• Program offerings</li> <li>• Career exploration/recruitment activities and participation</li> </ul>

Considerations	Potential Data Sources
<b>5S1: Program Quality — Attained Recognized Postsecondary Credential</b>	
<ul style="list-style-type: none"> <li>• Are most of your schools in person or remote?</li> <li>• For schools using remote instruction, are virtual proctoring opportunities available for credentials?</li> <li>• Are programs that typically have the largest number of students earning industry certifications continuing to be offered?</li> <li>• Are schools still budgeting for certification exams, or have budgets been cut?</li> </ul>	<ul style="list-style-type: none"> <li>• Early trend data from credentialing providers on exam pass rates</li> <li>• Expenditures on certification exams</li> <li>• Early trend data from other government agencies that provide licenses</li> </ul>
<b>5S2: Program Quality — Attained Postsecondary Credits</b>	
<ul style="list-style-type: none"> <li>• Are most of your schools in person or remote? How about your postsecondary institutions?</li> <li>• For schools/colleges using remote instruction, are virtual opportunities available? Could enrollment actually increase due to the availability of virtual offerings?</li> <li>• Are programs that typically provide the most opportunities for early postsecondary credit continuing to be offered?</li> <li>• Have any budget cuts affected early postsecondary credit programs?</li> </ul>	<ul style="list-style-type: none"> <li>• Course enrollment</li> <li>• Expenditures on tuition/fees provided by districts, colleges and/or the state</li> </ul>

Considerations	Potential Data Sources
<b>5S3: Program Quality — Participated in Work-Based Learning</b>	
<ul style="list-style-type: none"> <li>• Are most of your schools in person or remote?</li> <li>• For schools using remote instruction, are students still allowed to participate in in-person work-based learning?</li> <li>• Are virtual work-based learning experiences available? Do they count under your state’s work-based learning definition or business rules for Perkins accountability? If so, in which Career Clusters or program areas?</li> <li>• Are programs in essential industries/sectors or programs that typically provide the largest number of work-based learning opportunities continuing to be offered?</li> <li>• Are you expecting to lose employer partners because of the challenge of operating in-person facilities (e.g., nursing homes) or business closures?</li> <li>• Are different sectors/Career Clusters being affected disproportionately?</li> </ul>	<ul style="list-style-type: none"> <li>• Unemployment rates (by Career Cluster/sector)</li> <li>• List of essential occupations/industries in your state</li> <li>• Surveys of employer partners</li> <li>• Work-based learning enrollment</li> </ul>
<b>2P1: Earned Recognized Postsecondary Credential</b>	
<ul style="list-style-type: none"> <li>• What do early trends in postsecondary retention look like in your state?</li> <li>• How do your state WIOA partners anticipate the pandemic will affect their performance outcomes?</li> <li>• Have institutions been able to offer all the courses students need to complete programs?</li> <li>• Are students taking fewer courses or delaying graduation?</li> <li>• For industry certifications or licenses, are virtual proctoring opportunities available?</li> <li>• Has your state invested in short-term credentialing programs to mitigate the economic impacts of the coronavirus pandemic, and are these opportunities aligned to CTE programs?</li> </ul>	<ul style="list-style-type: none"> <li>• Postsecondary retention rates</li> <li>• Postsecondary credentials awarded in previous semesters</li> <li>• Early trend data from credentialing providers on exam pass rates</li> <li>• Expenditures on certification exams</li> <li>• Early trend data from other government agencies that provide licenses</li> </ul>

## Endnotes

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- <sup>1</sup> Strengthening Career and Technical Education for the 21st Century Act § 113 (2018).
- <sup>2</sup> Advance CTE. (2021). *Reopening tracking and analysis*. <https://docs.google.com/spreadsheets/d/1KY-gysCBbPT2hYGg4XXuPLxte152Gkxpbkblos4IPt0/edit#gid=326585425>
- <sup>3</sup> Burning Glass & ExcelinEd. (2020). *Credentials Matter COVID-19 case study: Examining the effect of the COVID-19 pandemic on career and technical education and associated industry credentials*. [https://www.excelined.org/wp-content/uploads/2020/09/ExcelinEd.CredentialsMatter.Phase2\\_Report.COVID-19.2020.pdf](https://www.excelined.org/wp-content/uploads/2020/09/ExcelinEd.CredentialsMatter.Phase2_Report.COVID-19.2020.pdf)
- <sup>4</sup> National Student Clearinghouse. (2020). *COVID-19: Stay informed with the latest enrollment information*. <https://nscresearchcenter.org/stay-informed/>
- <sup>5</sup> Georgetown Center on Education and the Workforce. (n.d.). *Tracking COVID-19 unemployment and job losses*. <https://cew.georgetown.edu/cew-reports/jobtracker/>
- <sup>6</sup> Strengthening Career and Technical Education for the 21st Century Act § 123 (2018).
- <sup>7</sup> Office of Career, Technical, and Adult Education, U.S. Department of Education. (2021). *Program memorandum — Revised to update the program memo originally issued on December 15, 2020*. <https://s3.amazonaws.com/PCRN/docs/Program-Memo-Requirements-and-Submission-Instructions-for-FY-2021-Perkins-Grant-Awards.pdf>
- <sup>8</sup> National Student Clearinghouse. (2020). *COVID-19: Stay informed with the latest enrollment information*. <https://nscresearchcenter.org/stay-informed/>
- <sup>9</sup> Data Insight Partners. (n.d.). *Current FAFSA completion rates by state*. [https://national.fafsatracker.com/currentRates?sortBy=current\\_comp\\_rate&](https://national.fafsatracker.com/currentRates?sortBy=current_comp_rate&)
- <sup>10</sup> RTI International. (2020). *Technical assistance to states 2019-20: Final report to the South Carolina Department of Education*. <https://s3.amazonaws.com/PCRN/uploads/TAToSouthCarolinaFinalReport.pdf>
- <sup>11</sup> Sutter, R. (2016). *A methodology for statistical adjustment under the Workforce Innovation and Opportunity Act (WIOA)*. U.S. Department of Labor. [https://www.dol.gov/sites/dolgov/files/ETA/performance/pdfs/WIOA\\_Statistical\\_Model\\_Methodology\\_Report-6-24-2016.pdf](https://www.dol.gov/sites/dolgov/files/ETA/performance/pdfs/WIOA_Statistical_Model_Methodology_Report-6-24-2016.pdf)
- <sup>12</sup> National Student Clearinghouse. (2020). *COVID-19: Stay informed with the latest enrollment information*. <https://nscresearchcenter.org/stay-informed/>