



DRAFT

2024-2028

Michigan State Plan

U. S. Department of Education
Office of Career, Technical, and Adult Education
Strengthening Career and Technical Education for the
21st Century Act (Perkins V)

Dr. Brian L. Pyles
State Director

2024-2028



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**U. S. Department of Education
Office of Career, Technical, and Adult Education**

**Strengthening Career and Technical Education for the 21st Century Act
(Perkins V) State Plan**

I. COVER PAGE

A. State Name: Michigan

B. Eligible Agency (State Board) Submitting Plan on Behalf of State:

State Board

C. Person at, or officially designated by, the eligible agency, identified in Item B above, who is responsible for answering questions regarding this plan. This is also the person designated as the "authorized representative" for the agency.

1. Name: Dr. Brian L. Pyles

2. Official Position Title: State Director

3. Agency: Michigan Department of Education, Office of Career and Technical Education

4. Telephone: (517) 335-5224

5. Email: pylesb@michigan.gov

D. Individual serving as the State Director for Career and Technical Education:

X Check here if this individual is the same person identified in Item C above and then proceed to Item E below.

1. Name: _____

2. Official Position Title: _____

3. Agency: _____

4. Telephone: (_____) _____ 5. Email: _____

- E. Type of Perkins V State Plan Submission - FY 2019 (*Check one*):
- ☐ 1-Year Transition Plan (FY2019 only) – *if an eligible agency selects this option, it will then complete Items G and J*
 - X State Plan (FY 2019-23) – *if an eligible agency selects this option, it will then complete Items G, I, and J*
- F. Type of Perkins V State Plan Submission - *Subsequent Years (Check one)*:⁴
- X State Plan (FY 2020-23) - *if an eligible agency selects this option, it will then complete Items H, I, and J*
 - ☐ State Plan Revisions (Please indicate year of *submission*: _____) - *if an eligible agency selects this option, it will then complete Items H and J*
- G. Submitting Perkins V State Plan as Part of a Workforce Innovation and Opportunities Act (WIOA) Combined State Plan – FY 2019 (*Check one*):
- ☐ Yes X No
- H. Submitting Perkins V State Plan as Part of a Workforce Innovation and Opportunities Act (WIOA) Combined State Plan – *Subsequent Years (Check one)*:⁵
- ☐ Yes (*If yes, please indicate year of submission*: _____)
 - X No
- I. Governor’s Joint Signatory Authority of the Perkins V State Plan (*Fill in text box and then check one box below*):⁶
- Date Governor was sent State Plan for signature:**
- ☐ The Governor has provided a letter that he or she is jointly signing the State plan for submission to the Department.
 - ☐ The Governor has not provided a letter that he or she is jointly signing the State plan for submission to the Department.

⁴ Item F will only appear to the user in the Perkins V State Plan Portal in subsequent years (FY 2020-23).

⁵ Item H will only appear to the user in the Perkins V State Plan Portal in subsequent years (FY 2020-23).

⁶ Item I is required in FY 2019 only for States that choose to submit a full Perkins V State plan, covering FY 2019-23.

J. By signing this document, the eligible entity, through its authorized representative, agrees:

1. To the assurances, certifications, and other forms enclosed in its State plan submission; and
2. That, to the best of my knowledge and belief, all information and data included in this State plan submission are true and correct.

Authorized Representative Identified in Item C Above (Printed Name) Dr. Brian L. Pyles	Telephone: 517-335-5224
Signature of Authorized Representative	Date:

Michigan's Career and Technical Education Vision

Michigan's Career and Technical Education (CTE) system will provide learners with access to equitable, high-quality secondary and postsecondary CTE Programs aligned to rigorous academic and technical standards, and career ready practices.

The CTE system will:

Encompass multiple career pathway entry and exit options, including progressively intensive work-based learning, and leadership opportunities, culminating in a postsecondary recognized credential;

Cultivate multi-stakeholder collaboration with business, industry, labor, and community partners, to develop in-demand, credential driven, robust career pathways;

Support strong alignment and partnership between K-12 educators, employers, community colleges and higher education institutions and;

Prepare the existing and emerging workforce to result in educated, skilled, informed and responsible residents.

II. NARRATIVE DESCRIPTIONS

A. Plan Development and Consultation

- 1. Describe how the State plan was developed in consultation with the stakeholders and in accordance with the procedures in section 122(c)(2) of Perkins V. See Text Box 1 for the statutory requirements for State plan consultation under section 122(c)(1) of Perkins V.**

Stakeholders were engaged in development of the State plan at every stage of development. To ensure that all stakeholder groups were engaged early and often throughout the process, the Michigan Department of Education - Office of Career and Technical Education (MDE - OCTE) and the Michigan Department of Labor and Economic Opportunity - Workforce Development (LEO - WD) convened a State Plan Executive Committee which included representatives from secondary and postsecondary education as well as community and employer representatives. Representatives included: Career Education Planning District (CEPD) Council; intermediate school districts; Michigan Occupational Deans Administrative Council (MODAC); community colleges; a representative from a historically black university; tribal organizations; tribal college representative; Workforce Development; adult education; charter schools; teachers; faculty; secondary school leaders; specialized instructional support personnel; career and academic guidance counselors for secondary and postsecondary; paraprofessionals; parents; students; community organizations, Workforce Innovation and Opportunity Act (WIOA) representative; Every Student Succeeds Act (ESSA) representative; Michigan Associate of Career and Technical Education (MI ACTE); representatives for special populations;

Michigan School Counselor Association; members of special populations; small business; industry and sector partnerships; businesses; employers; labor organizations; representative for out of school youth; representative for homeless children; at-risk state coordinator; Tribal Council of Governments; representative from the Governor's Office; Michigan Department of Corrections; Michigan Economic Development Corporation; representative for the Marshall Plan; representatives from the Michigan Department of Labor and Economic Opportunity - Workforce Development (LEO - WD); and state plan subcommittee chairs.

Four State Plan subcommittees were also convened: The Accountability Subcommittee; the High Quality CTE Programs of Study Subcommittee; the Equity and Special Populations Subcommittee; and the Comprehensive Local Needs Assessment Subcommittee. Each subcommittee consisted of interested stakeholders who made recommendations regarding the relevant section of the State Plan and implementation of Perkins V. The purpose of the Executive Committee and subcommittee work was to provide all segments of the public and interested organizations and groups an opportunity to present their views and make recommendations regarding the State Plan.

At each of the Perkins V Executive Committee meetings, the four subcommittees presented updates and recommendations. During the first Executive Committee meeting, members held table discussions on the following topics:

1. What should high school CTE programs focus on to prepare students for college and career? Comments focused on the need for employability/soft skills, need for student awareness of career options, preparation for industry-recognized certifications, and transition to postsecondary.
2. What should community college CTE programs focus on to prepare students/learners for college and career? Comments included focus on flexibility in programming, ability to transfer seamlessly to a four-year program, connecting students to resources such as childcare, development of soft skills, academic skills, and work-based learning opportunities.
3. What obstacles prevent students from taking Secondary and Postsecondary CTE courses? Obstacles identified included stigma of CTE, four-year institutions not accepting CTE academic credits, students unaware of opportunities, childcare needs, parent awareness of CTE, counselors preventing students from seeing the value of CTE, and college admissions advisors.
4. What can K-12 and Secondary CTE education do to balance student interests and local workforce needs? Comments included schools need to know about in-demand jobs, helping students understand all jobs in a pathway, partner with industry/employer engagement, early career exploration, wage data and opportunity information, align counseling services to support students, and reduce barriers to high school students earning credentials.
5. What can the community college system do to balance student interests and local workforce needs? Comments included assessing student interests, internships, college systems staying current on local market needs, job fairs/recruitment events, pair students with industry mentors, employer focus groups.

6. What hinders partnerships between Secondary and Postsecondary institutions? Comments included a need for the State to drive secondary-postsecondary partnerships, geography, resistance to change, financial issues with dual enrollment, lack of communication, differing needs and accountability requirements, lack of shared professional development, competing responsibilities for administrators, lack of incentive to partner, and lack of understanding of the benefit of partnership by department chairs.
7. What hinders partnerships between business/industry and education? Comments included lack of standardization across the state, understanding each stakeholders' roles, lack of time, lack of shared strategies, pupil accounting and child labor laws, and transportation for work-based learning limitations.
8. How can we identify and secure stronger commitments from business and industry partners for work-based learning experiences? Suggestions included CTE teacher externships, decisions driven by labor market information, employer champions, outreach from CTE programs to business and industry, student internships, continuing education "credits" for employers who engage, address hazardous occupation insurance requirement for minors, Marshall Plan for Talent a great example, more advisory committee members, develop clear work-based learning guidelines.

The second Executive committee meeting included discussion on the Perkins V vision and gathered additional stakeholder questions and comments on accountability recommendations. The third meeting engaged committee members in discussion of high quality CTE programs of study, and special populations. The fourth committee meeting focused on gathering input on the definition of size, scope, and quality, the new Perkins V nontraditional program list, and the secondary Core Performance Indicator (CPI) baselines and State Determined Levels of Performance (SDLPs).

A detailed description of the process and input of the secondary Accountability subcommittee is provided under Section D. Accountability.

The High Quality CTE Programs of Study (HQCTEPOS) subcommittee met three times between April and October 2019 and will continue to meet throughout Perkins V. During the first meeting, members were provided with the Association of Career and Technical Education (ACTE) Quality CTE Program of Study Framework. At the second meeting, members were updated on the work of the PV State plan executive committee and subcommittees, with emphasis on the work of the accountability subcommittee. The subcommittee was charged with developing a framework for a high-quality program of study in Michigan. The group reviewed the Perkins V State Transition Plan responses regarding programs and programs of study, and subcommittee members were asked to review each response and indicate if any additional information could be added to reflect Perkins V. The subcommittee reviewed the Perkins V Core Performance Indicators and discussed possible cluster level programs and possible credentials. The subcommittee also discussed stackable credentials and who should determine what credentials would be appropriate.

The Equity and Special Populations subcommittee gathered and incorporated stakeholder input for the State plan by developing and distributing a survey of questions related to the needs of special population students. The twenty diverse stakeholders included state of Michigan representatives, secondary and postsecondary administrators and staff, a postsecondary student, postsecondary faculty, and secondary teachers. The survey, administered electronically, included a summary of the Perkins V special population categories and eight questions that required comprehensive responses. Telephone conversations were also held if additional clarification to a response was required. Additional input regarding special population students was garnered from members of the Executive Committee. A presentation was provided to the Executive Committee to summarize the Perkins V special population categories. After the presentation, the Executive Committee was placed in groups and the survey was distributed to the groups. Responses were compiled and added to the Equity and Special Population Subcommittee's previous responses. The written responses from stakeholders were compiled and grouped according to the questions posed in the survey. Once the questions were grouped and reviewed, they were incorporated into the State Plan to identify barriers, needs and activities that will support the success of special population students.

The Comprehensive Local Needs Assessment (CLNA) was designed in collaboration with the Perkins V CLNA subcommittee, inclusive of secondary and postsecondary stakeholders. A draft CLNA process and supporting documents were developed based on the AdvanceCTE and National ACTE CLNA guides. The draft was provided to the CLNA subcommittee at the first subcommittee meeting. The committee recommended developing separate secondary and postsecondary CLNA documents because many of the postsecondary agencies provide programs of study across multiple secondary regions. Through a series of subcommittee meetings, the CLNA structure, questions, data sources and processes were revised to align to local data systems and the workforce development structure. To secure additional stakeholder feedback, the Perkins V Statewide Executive Committee reviewed a CLNA draft and provided input to the subcommittee. After the statewide CLNA launch, the committee members continued to provide input and direction in developing the ongoing question and answer document. The committee members are committed to reconvening in early 2020 to review the process and begin preparing for CLNA 2021. In addition to developing the CLNA in collaboration with the subcommittee, feedback was solicited from the Perkins V CLNA subcommittee, CTE administrators, and occupational deans at statewide meetings and the input was utilized in later drafts of the documents.

In addition to the Executive Committee and subcommittees, individual meetings with specific stakeholder groups were held where requested. MDE - OCTE and LEO - WD Perkins staff met with Tribal Education Directors on August 15 and October 22 for initial information sharing and formal consultation. As a result of these discussions, one of the Tribal Education Directors came and met with OCTE program staff for mutual information sharing and will be presenting at the State Career Education conference as well. Many of the verbal and written comments focused on the need for student exposure to careers, local needs in jobs and development of skills such as resume building, job search skills, and general soft

skills. There were also comments about the importance of making parents aware of the value of CTE and overcoming the negative reputation of CTE. Barriers to participating in CTE including cost, childcare, and transportation, among others. Counselor overload and difficulty recruiting qualified CTE teachers from industry were also identified as issues. The importance of tribal enterprises as a source of employment and training for students was identified.

The MDE - OCTE held a conference call with a representative of an Authorized Public Chartering Agency on August 7.

- 2. Consistent with section 122(e)(1) of Perkins V, each eligible agency must develop the portion of the State Plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education after consultation with the State Agencies identified in section 122(e)(1)(A)-(C) of the Act. If a State agency, other than the eligible agency, finds a portion of the final State Plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary. (Section 122(e)(2) of Perkins V)**

The amount and uses of funds proposed to be reserved was reviewed and discussed with all groups required under section 122(e)(1)(A)-(C) which included representatives from both secondary and post-secondary education.

- 3. Describe opportunities for the public to comment in person and in writing on the State Plan. (Section 122(d)(14) of Perkins V)**

The MDE - OCTE and LEO – WD conducted five public hearings in the state to provide the public, all required stakeholders, interested organizations and groups (including teachers, faculty, specialized instructional support personnel, paraprofessionals, school leaders, authorized public chartering agencies and charter school leaders, employers, labor organizations, parents, students, Indian Tribes and Tribal organizations, and community organizations) the opportunity to provide feedback and make recommendations on the State Plan. The draft was made available on the Michigan Perkins V website for more than 60 days, distributed as an email attachment, and mailed upon request. The State Plan hearings were held in five regions of the state to assure access for interested parties to participate and allowed participation in person or via conference call. To leverage the active participation of our partner agencies and institutions, a local host was identified to greet hearing attendees, collect sign-in sheets, recording the hearings, and assist with remote access to the hearings. OCTE and LEO staff conducted the hearings either in person or through distance technology. At the beginning of each hearing the OCTE or LEO moderator read a prepared script explaining the purpose of the hearing, where a copy of the State Plan and executive summaries could be found, and asked individuals wishing to comment to identify themselves so that they could be called on. No individuals participated in person or through distance technology at the five hearings. State staff and the local hosts were present for the entire two-hour period for each of the hearings and periodically checked verbally and visually for participants. At most of the locations the distance technology showed all

individuals who had joined the meeting. The hearings were held at:

West: Grand Rapids Community College (November 25, 2019)

MidMichigan: Ingham ISD (November 26, 2019)

Upper Peninsula: Marquette-Alger ISD (December 3, 2019)

Southeast: Wayne County RESA (December 4, 2019)

Northwest: Charlevoix-Emmet ISD (December 10, 2019)

The public was also provided the opportunity to review the State Plan and comment through an online survey posted on the Michigan Perkins V website along with a copy of the State Plan draft. The survey was available for comments for 30 days. Comments were also accepted in writing by mail during the same 30-day period. The opportunity to comment regarding how the State Determined Levels of Performance meet the requirements of the law, support the improvement of performance of all CTE concentrators, including subgroups of students and special populations, and support the needs of the local education and business community was provided through the online survey or by mail for 60 days.

The public comment survey and public hearings schedule were publicized through MDE email announcement to all school districts, through three posts to the MDE Facebook page, and through direct email announcements to secondary and postsecondary stakeholder groups including secondary CTE administrators, and community college occupational deans and institutional research staff, as well as a direct email to Michigan Tribal Education Directors.

MDE and LEO staff met twice with the Confederation of Tribal Education Directors to present information on CTE and the Perkins V State Plan. Tribal Education Directors provided comments both verbally and in writing, both spontaneous and in response to stakeholder engagement questions from MDE and LEO.

In addition to these formal public comment opportunities, MDE and LEO developed the plan through a series of meetings held for the explicit purpose of developing sections of the plan and through four Perkins V State Plan executive committee meetings described under section I.A.1.

Updates and discussions on specific elements of the Perkins State plan were also discussed and input solicited at the following events:

Date	Event Name	Presentation Titles
March 6, 2018	P20 Council Meeting	Perkins V Accountability
January 11, 2019	Michigan Community College Data and Evaluation Committee	Perkins V Update
January 15, 2019	Understanding and Using CTE Data workshop	Perkins V Accountability Overview
January 16, 2019	Grant Dissemination Workshop	Michigan Planning for Perkins V

Date	Event Name	Presentation Titles
February 2019	State Board of Education	Presentation of PV Transition Plan and PV Timeline
March 1, 2019	Career Readiness Cross-Sector Team	Update on Perkins State Plan
March 21, 2019	OCTE Spring Update	Perkins V Local Needs Assessment Working Lunch: Special Populations/Equity High Quality CTE Programs Perkins V Accountability Subcommittee Update
April 12, 2019	MODAC and MCCDEC joint meeting	Perkins V Comprehensive Local Needs Assessment Perkins V Committee Work Perkins V Postsecondary Assessment Committee Work
April 24, 2019	Data Forum for Perkins V State Plan Development—Local Needs Assessment	
May 1-3, 2019	Michigan Occupational Special Populations Association Conference	Perkins V Special Populations Update
June 13, 2019	Michigan Community College Data and Evaluation Committee	Update on Work of Perkins V subcommittees/Discussion about Perkins V Comprehensive Local Needs Assessment Development
June 19, 2019	CEPD Council Meeting	Perkins V CLNA
June 26, 2019	Career Readiness Cross-Sector Team	Update on Perkins V State Plan
July 18, 2019	Perkins V Core Performance Indicators Baselines and Proposed Targets Webinar	
July 31, 2019	Perkins V Postsecondary Comprehensive Local Needs Assessment Overview	

Date	Event Name	Presentation Titles
August 1, 2019	MODAC	Perkins V Update
August 2, 2019	Perkins V Core Performance Indicators Baselines and Proposed Targets Webinar	
September 25, 2019	Perkins V Postsecondary Comprehensive Local Needs Assessment and Postsecondary Accountability and Reporting	
October 17, 2019	Career Readiness Cross-Sector Team Meeting	Summary of Perkins V State Plan and public hearing schedule Review tools and process for identifying credentials of value
October 18, 2019	CEPD Council Meeting	CTE Credential Selection Process OCTE Follow-Up Survey: timeline and Q&A
October 29, 2019	OCTE Fall Update	Working Lunch: Perkins V Updates
November 12, 2019	Michigan State Board of Education	Presentation of Draft Perkins V State Plan
November 15, 2019	Michigan Business Education Association	Students within Special Populations in Career and Technical Education
November 20, 2019	CEPD Council Meeting	OCTE Updates: CLNA
January 14, 2020	Understanding and Using CTE Data workshop	Perkins V Course CLNA Discussion Perkins V Credential Data Collection
January 15, 2020	Grant Dissemination Workshop	Preparing Programs for Perkins V Regional Grant Team Time: Work with your OCTE Team Leader to address CLNA, CPIs, and Grant Management

Public comments submitted in writing through the online survey include the following:

Respondent #1

Comments submitted on behalf of: United Rentals, INC.

Stakeholder Group: Representatives of Business and Industry

County: Wayne

School or Organization: United Rentals, INC

Name: Kelly French

Contact Information: kfrench@ur.com

Support the Plan: Yes

COMMENTS:

Section A: "Support with no revisions"

Section B: "Agree and support the vision"

Sections B2, B3, B4, C, D, D1, D2, D3, IV, V: "Support"

RESPONSE: none required

Respondent #2

Comments submitted on behalf of: As an individual

Stakeholder Group: Teachers

County: Grand Traverse

School or Organization: Youth Solutions

Name: Margaret Novy

Contact Information: *not provided*

Support the Plan: Yes

COMMENTS: *[None]*

RESPONSE: none required

Respondent #3

Comments submitted on behalf of: As an individual

Stakeholder Group: Faculty

County: Genesee

School or Organization: Ferris State University

Name: Mike Ennis

Contact Information: ennisf@ferris.edu, 8104297046

Support the Plan: Support with minor revisions

COMMENTS:

Section B1: "This section was extremely valuable in explaining how the CTE system components are related and cooperative."

Section B3: "I have seen how this section handled the issue of special needs students' disability and how industry needs talented technicians. It is often assumed that all job titles within a specific field are the same; this is not the case. If a student cannot pass the ASE tests, then he/she could fit into a position that does not require the passing of the skill but rather be in a supportive role for people that have these job titles in the outside world until they may acquire the skill through more time and effort on the job. There gradients of skill needed in all jobs - these need to be identified and developed as options for some students."

Section B4: "There seems to be little mention of how the Office of Career and Technical

Education will collaborate with universities in preparing CTE teachers. It would seem that universities help prepare new CTE teachers but were not directly involved in creating this proposal. The university's need sub grant proposal opportunity to facilitate this progress through this grant. The dissemination of the findings/projects of such grants needs to be made widely available. There should be an annual update of changes designed for university faculty within the MDE and OCTE. (Shadowing opportunities for university faculty for activities such as TRAC Reviews, MDE certification process, summer internships, etc.)"

Section V: "I was a little confused as to how the performance levels were determined. There seemed to be not expectation of increased performance in the future."

RESPONSE:

B3: Career guidance, resources and information will be provided to all students based on their interest and abilities.

B4: OCTE will continue to collaborate with institutions to further develop opportunities for preparation of CTE teachers and faculty.

V: Based on limited available information baseline data was established and the State has the opportunity to revise the State adjusted levels of performance after two years. Current targets are conservative projections based upon responses received.

Respondent #4

Comments submitted on behalf of: As an individual

Stakeholder Group: Representatives of Postsecondary CTE Programs

County: Mason

School or Organization:

Name: *not provided*

Contact Information: *not provided*

Support the Plan: Don't support the plan

COMMENTS:

Section B3: "According to Koppelman and Goodhart (2017) nearly 20% of us have a disability and 70% of those with disabilities live beneath the poverty level. This is a societal issue that will not be resolved through legislation or academia. As open access institutions, Michigan's Community Colleges serve ALL students; no population is being discriminated against. To track and report on these special populations is burdensome and expends resources that could be more impactful elsewhere."

RESPONSE:

Section 113 of the legislation requires that data on Special Populations must be collected and maintained.

Respondent #5

Comments submitted on behalf of: As an individual

Stakeholder Group: Representatives of Postsecondary CTE Programs

County: Kent

School or Organization: *not provided*

Name: *not provided*

Contact Information: *not provided*

Support the Plan: Don't support the plan

COMMENTS:

Section A: "Actual consultation and input considered and responded to for postsecondary was incredibly limited. Additionally, the State Plan was posted over a month after it had been

indicated on MDE website it would be (even after Oct 1 still said it would be posted Oct 1, then changed to "coming soon") and approximately 2 weeks before public comment sessions. MDE did not attend public comment session I attended, only joined by phone, giving impression this was not important enough for them to be face to face with stakeholders. Also, no overview of the plan given during comment session. Additionally, scheduling of public input sessions gave clear impression that MDE did not want input/attendance ... two scheduled the week of Thanksgiving, and the others right after Thanksgiving. When electronic feedback form posted, originally stated that comments on all sections other than D was due November 4, which was before form even posted, and D immediately following conclusion of public comment sessions (Dec 13 or 14 I believe). Again, impression that MDE is not interested in feedback/input from stakeholders."

RESPONSE: Posting the State plan online was delayed in order for the State plan to be shared with the State Board of Education prior to posting. Public hearings were held in person with opportunity to participate through distance technology in order to provide the broadest access to individuals across the state. To leverage the active participation of our partner agencies and institutions, State staff partnered with local hosts to hold the public hearings in five quadrants of the state. State staff ensured that each public hearing began with an explanation of the hearing process, information on where State plan materials could be found, and requested attendees wishing to comment to identify themselves so that they could be called upon to comment. Sign in sheets were also utilized to ensure that individuals wishing to comment were provided with the opportunity. Public hearings were designed to provide an opportunity to gather comments related to the publicly available State Plan documents. Regarding scheduling hearings during Thanksgiving week, the State of Michigan had a limited window in which to hold the hearings between the presentation to the State Board of Education and when public comments needed to be gathered. Since all five hearings were available to the entire state through distance technology a variety of hearing times and locations were widely available to interested stakeholders.

Section B1: "Postsecondary plan outlined is very weak and limited detail in this section. Michigan Reconnect has not been introduced as a strategy (nor was MI Opportunity) as it states on page 12. These were proposed by the Governor, but essentially have not moved since April 2019 when the issues with the State budget began. Goal 1 relative to postsecondary--the comprehensive local needs assessment for postsecondary was incredibly flawed and LEO-WDA acknowledged there were errors in the template, considerable unanswered questions, etc. and multiple times indicated corrected/updated template would be provided and FAQ, but neither ever were. Also, LEO-WD provided contradictory information to postsecondary stakeholders relative to multiple areas of the CLNA. Unclear how LEO-WD will use this to identify program providers, employers, etc. needs and supports given the considerable problems with the LCNA. Goal 3 relative to postsecondary--what input was obtained from the audiences listed on professional development opportunities needed relative to Perkins V? Page 19, area 2--identifies how MDE will report for secondary the "effectiveness of...funds in achieving the goals.. " but as with multiple sections of this State plan, is silent on what will be done for postsecondary.

RESPONSE: The State plan may span up to ten or twelve years and was written broadly to accommodate this. Section B1 of the plan was revised to utilize more generic examples. The Comprehensive Local Needs Assessment (CLNA) is mandated under Perkins legislation section 134. The questions within the CLNA were developed with the help of stakeholders to address legislative requirements. LEO-WD, MDE-OCTE, and stakeholders will continue to refine the CLNA tools over the course of Perkins V based upon feedback from eligible subrecipients. As indicated

in the State plan LEO-WD, MDE-OCTE and stakeholders will continue to gather input to provide relevant and effective professional development.

Section B2: Comprehensive local needs assessment template for postsecondary was incredibly confusing and contained errors and inconsistent information. Multiple webinars had to be provided by LEO-WDA as a result of the confusion, and each time we were told there would be updated/corrected template and an FAQ document produced, but neither ever happened. Additionally, staff within LEO-WDA contradicted each other with answers provided orally and in email to individuals regarding LCNA. Incredibly disappointing and frustrating experience to attempt to do an incredibly time consuming LCNA with no support, actual guidance, and contradictory information from LEO-WDA. Stark contrast between the MDE LCNA template document for secondary programs compared to postsecondary template from LEO-WDA. Doing an LCNA is incredibly important and could be incredibly helpful to the programs, but the postsecondary template and process was so flawed and frustrating, it likely will not be helpful at all to us in program planning, review, needs assessment, etc.

RESPONSE: The CLNA is mandated under Perkins legislation section 134. The questions within the CLNA were developed in collaboration with secondary and postsecondary stakeholders to address legislative requirements. LEO-WD, MDE-OCTE, and stakeholders will continue to refine the CLNA tools over the course of Perkins V based upon feedback from eligible recipients.

Section B3: Information provided by LEO-WDA on the postsecondary special populations (new) was not consistent with information provided by federal program officer weeks later.... after time had already been spent by postsecondary trying to figure out how to collect, or what proxy data could be used, etc.

RESPONSE: Information regarding special populations was consistent with information received from US DOE. LEO-WD will continue to update stakeholders as information is received. The plan reflects the current guidelines from US DOE.

Section B4: Majority of professional development opportunities outlined are for secondary only. Limited opportunities outlined for postsecondary, and unclear how only those areas were identified for postsecondary.

RESPONSE: As indicated in this section of the State plan responses apply to both secondary and postsecondary.

Section D: LEO-WDA process for "simulated data" for Perkins V CPIs, and establishing targets, especially for 1P1 is incredibly flawed. The "simulated data" for 1p1 was based on local alumni survey results, and as stated by LEO-WDA non respondents to the survey were held against the school for outcomes (and also the reason the target is so incredibly low). However, on page 59 it is stated that "survey response rates had a significant impact on the measure. Under Perkins V, the State will measure postsecondary retention and placement (Perkins V, 1p1) of all CTE concentrators, regardless of their response to the locally developed surveys. this methodology will more closely align with WIOA reporting. The State will explore additional methods for identifying positive placement outcomes for CTE concentrators." Absolutely no detail on what this "measure" regardless of response to locally developed surveys is provided, nor the potential "additional methods for identifying positive placement outcomes." And..... if these actually have been identified by LEO-WDA, why were they not used for the "simulated data" for 1p1 and establishing targets instead of the responses to locally developed surveys?

RESPONSE: The State acknowledges that the existing data utilized for the simulation was not reliable. Based upon aggregated data, the State worked to develop the most accurate simulation

possible according to legislative requirements. This will continue to evolve as disaggregated data are collected moving forward.

Section D1: Significant flaws in LEO-WD estimated baseline and targets for 1p1. Where is the documentation that the Postsecondary Accountability Subcommittee had opportunity to truly provide feedback on simulated data, methodology and proposed CPIs, and advised for those definitions--relative to all of them, but especially 1P1? I was at meetings that these were presented/discussed (not PAS meeting), and there were considerable concerns and questions raised by those Perkins involved staff to these proposed methods. LEO-WDA staff were frustrated with the questions and concerns and essentially said this was the way they decided to do it.

RESPONSE: See response to comment for section D (above).

Section V: Methodology and "simulated data" used for postsecondary is problematic, especially for 1p1

RESPONSE: See response to comment for section D (above).

Respondent #6

Comments submitted on behalf of: On behalf of a group or organization--Michigan Community College Data Evaluation Committee (MCCDEC)

Stakeholder Group: Representatives of Postsecondary CTE Programs

County: (not applicable—submitted on behalf of a group)

School or Organization: Michigan Community College Data Evaluation Committee (MCCDEC)

Name: Eileen Brennan

Contact Information: ebrennan1@hfcc.edu, 313-845-9681

Support the Plan: (no response)

COMMENTS:

As representatives of postsecondary education institutions, we ask that the State include its commitment to the following in the State plan:

- Continuing efforts and work to ensure that postsecondary providers have access to the level of employment outcome data needed to identify specific program improvement needs, i.e., student record level data.
- Consistent and timely updates on and resources to ensure postsecondary providers are advised of what constitutes career technical education by CIP Code, and on what defines nontraditional programs by program, as well as identification of high demand/wage/skill programs by CIP code.
- Continuing efforts to identify acceptable industry recognized credentials external to postsecondary institutions.
- Continuing work to identify resources and methods to obtain data regarding student completion of industry recognized credentials external to postsecondary institutions.
- Commitment to full staffing of departments/units/agencies supporting, monitoring and evaluating postsecondary efforts to fulfill Perkins V requirements including succession planning to ensure continued expertise. As a group we are concerned about statements regarding alignment with WIOA data standards – it should be clear that alignment with these standards is not replication of these standards, rather complementary measures recognizing the differing governance structures and subsequent difference in allowable data collection and reporting. Finally, we note that in the accountability section regarding outcomes, local surveys are still allowed in the transition plan. However, non-respondents

to surveys are not included as a separate category, meaning that unknown outcomes are included as unsuccessful outcomes. This practice discourages efforts to develop methods to collect better data on this group. We suggest that the State add a category of non-respondent to identify the scope of the issue to encourage investigation into methods to collect the better data.

RESPONSE:

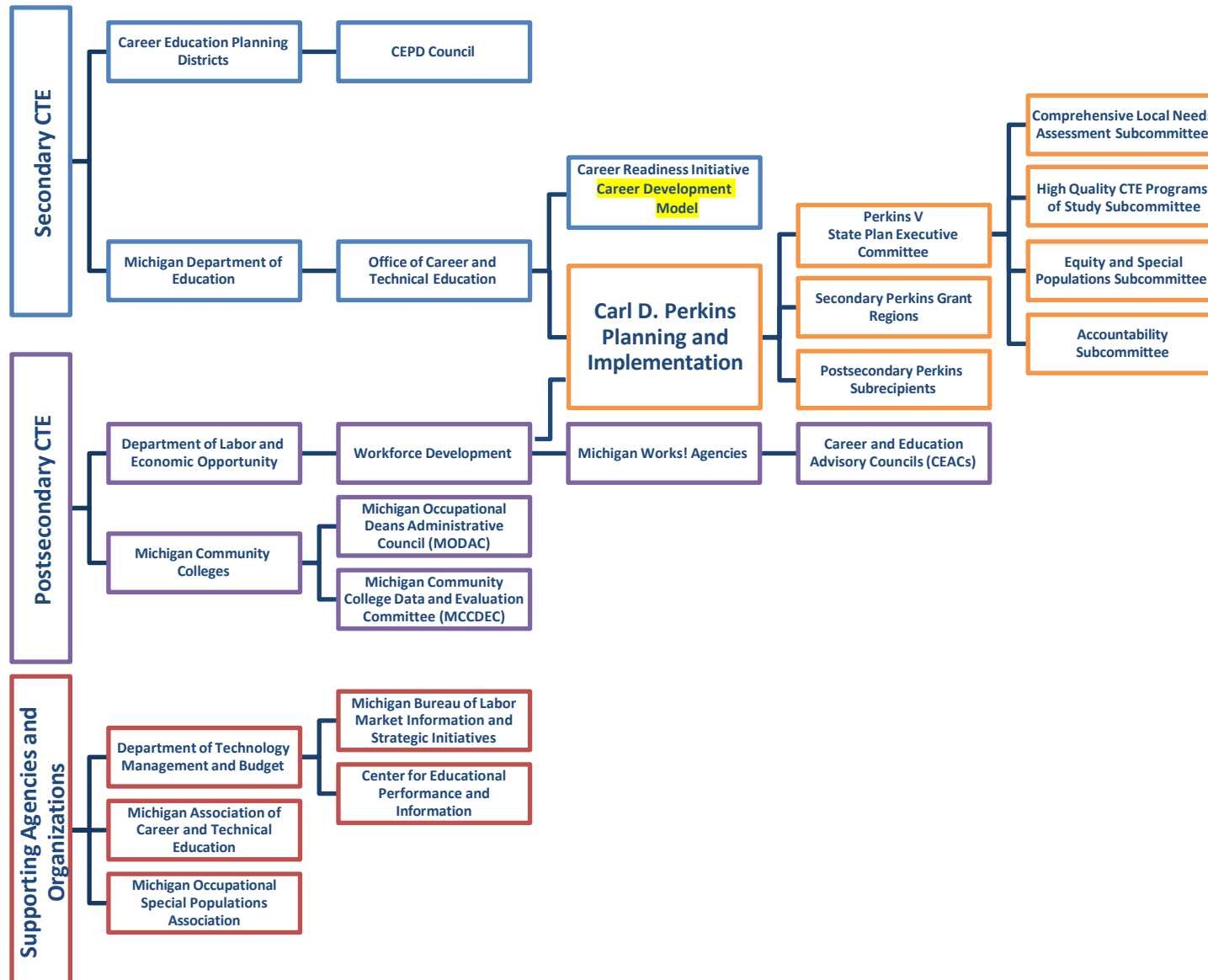
- Section 421.11(b)(1)(viii) of the Michigan Employment Security Act authorizes postsecondary education providers access to employment outcome data. The State will continue to examine ways to improve the process.
 - Guidance to subrecipients related to CIP Codes, nontraditional programs by program, and identification of high demand/wage/skill programs by CIP Code will be provided as received from US DOE. The State agrees that institutions should strive to investigate methods that identify the scope of issues related to non-response.
 - The State has implemented a competitive grant process to fund collaborative partnerships between secondary and postsecondary education providers and employers to identify recognized postsecondary credentials.
 - The State will continue to work to identify methods and processes to obtain student credential data through data sharing agreements.
 - The State acknowledges that the current measurement approach counts non-respondents as not placed. The State will provide technical assistance to the community colleges to improve the quality of the placement data. The Perkins Consolidated Annual Report does not have a nonrespondent field.
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B. Program Administration and Implementation

1. State's Vision for Education and Workforce Development

- a. Provide a summary of State-supported workforce development activities (including education and training) in the State, including the degree to which the State's career and technical education programs and programs of study are aligned with and address the education and skill needs of the employers in the State identified by the State workforce development board. (Section 122(d)(1) of Perkins V)**

Career and Technical Education is administered jointly by two agencies in Michigan---the Michigan Department of Education, and the Department of Labor and Economic Opportunity. The Figure and Table below show the key agencies and organizations involved in CTE in Michigan. The list is not comprehensive but shows the organization of the state agencies and a couple of the partner organizations that support Perkins-related activities.



Secondary CTE	Postsecondary CTE	Supporting Agencies and Organizations
<p>Michigan Department of Education Agency responsible for PreK-12 education including Every Student Succeeds Act (ESSA), secondary Carl D. Perkins, Early Childhood Education, Individuals with Disabilities Education Act (IDEA), School Nutrition Program</p>	<p>Department of Labor and Economic Opportunity Department responsible for multiple agencies including Workforce Development, Unemployment Insurance Agency, and Bureau of Employment Relations</p>	<p>Department of Technology, Management and Budget Department responsible for enterprise-wide business, financial, and technical services including Michigan Labor Market Information and Center for Educational Performance and Information</p>
<p><u>Office of Career and Technical Education</u> Office responsible for State approval, monitoring and technical assistance of secondary career and technical education and early middle colleges, State School Aid CTE categorical funding, Career Readiness Initiative, and secondary federal Carl D. Perkins funds.</p>	<p><u>Workforce Development</u> Agency responsible for employment assistance, hiring assistance, reemployment and layoff assistance. Includes: postsecondary Carl D. Perkins, community colleges, apprenticeships, Michigan Works!, WIOA Adult Programs, Unemployment Insurance Agency, Trade Adjustment Assistance</p>	<p><u>Michigan Bureau of Labor Market Information and Strategic Initiatives</u> One-stop shop for information and analysis on Michigan's population, labor market, and more</p>

Secondary CTE	Postsecondary CTE	Supporting Agencies and Organizations
<u>Perkins V Planning and Implementation</u> Joint secondary and postsecondary planning committees include Executive Committee and four subcommittees: Comprehensive Local Needs Assessment, High Quality CTE Programs of Study, Special Populations, Accountability	<u>Perkins V Planning and Implementation</u> Joint secondary and postsecondary planning committees include Executive Committee and four subcommittees: Comprehensive Local Needs Assessment, High Quality CTE Programs of Study, Special Populations, Accountability	<u>Center for Educational Performance and Information</u> Agency responsible for collecting, managing, and reporting education data in Michigan
<u>Perkins Grant Regions</u> Includes 27 Perkins Secondary Subrecipient Consortia	<u>Postsecondary Perkins Subrecipients</u> Includes 28 Community Colleges, one Tribal College, one 4-Year University	<u>Michigan Association of Career and Technical Education</u> A professional association of Career and Technical Education (CTE) professionals. Partners with the MDE to provide professional development for CTE educators.
<u>Career Education Planning Districts (CEPD)</u> Regional CEPD Administrators provide technical assistance, leadership, and coordination for planning activities in the CEPD.	<u>Michigan Occupational Deans Administrative Council (MODAC)</u> Purpose is to promote and support community college education for the State of Michigan. Comprised of community college occupational deans.	<u>Michigan Occupational Special Populations Association</u> Purpose is to inform members of the requirements of the Perkins legislation and assist in its implementation at the local level to ensure that the needs of the special population student are well served at the secondary and postsecondary levels.

Secondary CTE	Postsecondary CTE	Supporting Agencies and Organizations
<p><u>CEPD Council</u> Purpose of the Council is to assist in the development and implementation of Career and Technical Education (CTE) at all levels in the state. Comprised of CEPD administrators</p>	<p><u>Michigan Community College Data Evaluation Committee (MCCDEC)</u> Purpose: Assist the community colleges in improving their capacity to collect data. Comprised of community college institutional researchers.</p>	<p><u>Michigan Department of Corrections</u> Has jurisdiction over the state's prison system. Probation supervision is provided by the department and by various Circuit Courts. Offers CTE programming.</p>
<p>Career Readiness Initiative, <u>Career Development Model</u> The Career Readiness Initiative is an MDE strategy to engage stakeholders in ACTION to transform Michigan's Career Preparation System and achieve the career readiness goals identified in the Top 10 Strategic Education Plan. Includes representatives from employers, employer organizations, organizations representing k-12 and postsecondary educational institutions, and State agencies. <u>The Michigan Career Development Model (MI CDM) is designed to provide all students (K-12) in the Michigan educational system with the necessary knowledge and skills for success in a career of their choice and lifelong learning.</u></p>	<p><u>Michigan Works Agencies</u> Michigan Works! is a unified workforce development system. Governed by local Workforce Development Boards, sixteen Michigan Works! Agencies oversee local Michigan Works! Service Centers, where job seekers and employers can access services. Funded in part with WIOA funds.</p>	<p><u>Michigan Department of Health and Human Services</u> Oversees Juvenile Justice Programs which provide support for juvenile offenders. Offers CTE Programming.</p>

	<u>Career and Education Advisory Councils (CEACs)</u> Associated with each of the 16 Michigan Works! Agencies. Connect employers and educators with technical assistance to build career training programs. Review secondary Perkins annual application.	
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Michigan's vision for education and workforce development is reflected in the Strategic Plan of the Michigan Department of Education (MDE), and the Strategic Focus areas of the Michigan Department of Labor and Economic Opportunity – Workforce Development (LEO – WD). Michigan's Top 10 Strategic Education Plan Goals include: 1) Provide every child access to an aligned, high-quality P-20 system from early childhood to post-secondary attainment – through a multi-stakeholder collaboration with business and industry, labor, and higher education—to maximize lifetime learning and success; and 6) Create a strong alignment and partnership with job providers, community colleges, and higher education to assure a prepared and quality future workforce, and informed and responsible citizens. LEO – WD core focus areas include: #2: Grow existing talent development programs and services to enhance the skills of Michigan's workforce, and #5: Strengthen Michigan's Career & Technical Education (CTE) infrastructure. Strategic focus key measures for LEO – WD include: Key Measure #1: Work-Based Learning, and Key Measure #2: Industry-Recognized Credentials.

Consistent with this State's vision, Michigan's secondary and postsecondary CTE programs are aligned with and address the education and skill needs of Michigan employers to maximize lifetime learning, student success, and a skilled Michigan workforce. School districts and community colleges utilize current labor market information to demonstrate need for proposed secondary and postsecondary CTE programs. High-Quality CTE programs of study provide Michigan students with an aligned, seamless transition from secondary to postsecondary education through dual and concurrent enrollment opportunities, CTE Early Middle College programs, and local and statewide articulation agreements. The State collaborates with college access organizations to develop and support statewide associate to bachelor's degree transfer pathways. Business and industry representatives on secondary and postsecondary advisory committees provide ongoing guidance on the knowledge and skills required in the industry.

These secondary-postsecondary-employer connections are supported through adoption of statewide secondary CTE standards aligned with the national career cluster standards culminating in credentials. Reserve funds in Perkins V will be used to support further alignment of secondary and postsecondary instruction and identification of recognized postsecondary recognized credentials valued by Michigan employers.

- b. Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V)**

Michigan has a statewide goal of increasing the number of Michiganders with a postsecondary credential (a high-quality industry certificate, associate degree or

higher) from 45 percent to 60 percent by 2030. Attaining this goal will require Michigan do the following for all learners:

Michigan must¹:

- Continue to enhance and improve career awareness and college/career counseling at both high school and postsecondary levels;
- Enhance collaboration between K-12 and Higher Education institutions to improve alignment, articulation and acceptance of credit in appropriately rigorous academic and CTE content areas;
- Improve transfer and credit acceptance between various higher education institutions for seamless and efficient learner progression to credential-earning;
- Increase high school student participation in all forms of powerful and cost-saving early postsecondary credit-earning programs (dual enrollment, Early Middle Colleges, Career and Technical Education and AP/IB course taking) and;
- Enhance institutional credential completion and success strategies for learners among colleges and universities.

¹Total Talent: Equipping all Michiganders with the education and skills needed for success in the economy of today and tomorrow—Executive Summary.

Michigan's strategy is centered around the positive correlation between education attainment and household income levels. Proposals to close Michigan's skills gap, and lift the education attainment of our workforce, were recently introduced into the Michigan House and Senate. Good-paying jobs in Michigan don't always require a four-year degree, but all good-paying careers require some sort of postsecondary education, be it an apprenticeship, specialized credential, certificate or associate degree. Regardless of zip code and generational barriers, everyone deserves a path to a high-wage skill.

Michigan's strategy will align with Michigan's state vision for CTE, the LEO – WD strategic focus areas and Michigan's Top 10 Strategic Education Plan Goals and Strategies, made explicit in Goal 4: to reduce the impact of high-risk factors, including poverty, and provide equitable resources to meet the needs of all students to ensure that they have access to quality educational opportunities. [<https://www.michigan.gov/documents/mde/ MDE Goals and Strategies 2-8-16 514042 7.pdf>]

Michigan's Career and Technical Education Vision

Michigan's Career and Technical Education (CTE) system will provide learners with access to equitable, high-quality secondary and postsecondary CTE Programs aligned to rigorous academic and technical standards, and career ready practices.

The CTE system will:

- Encompass multiple Career Pathway entry and exit options, including progressively intensive work-based learning, and leadership opportunities, culminating in a postsecondary recognized credential;

- Cultivate multi-stakeholder collaboration with business, industry, labor, and community partners, to develop in-demand, credential driven, robust career pathways;

- Support strong alignment and partnership between K-12 educators, employers, community colleges and higher education institutions and;

- Prepare the existing and emerging workforce to result in educated, skilled, informed and responsible residents.

LEO – WD, MDE – OCTE and secondary and postsecondary institutions will utilize labor market information as well as information from industry and employers to identify employment demands and skills required for high-wage, high-skill and in-demand occupations. With completion of the Comprehensive Local Needs Assessment, input from employers, program advisory committees, special population representatives, and faculty and administrators, assistance will be provided to secondary and postsecondary institutions to determine new CTE programs that meet industry demands. Secondary and postsecondary institutions will identify activities; work-based learning opportunities, such as apprenticeships; and support services, such as tutoring, accommodations, attendance costs and academic advising; and guidance and counseling needs within the local annual grant application to assist secondary and postsecondary CTE students to complete their declared programs of study. Additionally, continuous assessment and evaluation of student needs and performance will assist students to overcome barriers to persistence, complete their programs of study, and receive an industry recognized postsecondary credential.

Strengthening CTE for the 21st Century will require innovative approaches to CTE programming and instruction. MDE – OCTE and LEO - WD will collaborate to promote innovation in the development of articulated career pathways utilizing support from reserve funding (see section C.2.a) to spur strong secondary-postsecondary education partnerships with business and industry. Well-designed innovative proposals will align identified technical skill standards to academic standards and recognized postsecondary credentials. The integration of technical skill development and academics with the collaboration of industry will assure the identification of credentials of value that are aligned with the occupational safety, and career ready practices required for high-skill, high-wage and in-demand occupations. This approach will produce high-quality CTE programs of study offering industry recognized credentials ensuring a prepared and quality workforce of today and tomorrow.

The MDE – OCTE and LEO - WD will strive to close gaps in equity irrespective of background, income or life circumstances for CTE secondary and postsecondary students to achieve access, inclusion, excellence, and promote their success in achieving an industry- recognized postsecondary credential. To close the equity gaps, both MDE – OCTE and LEO - WD secondary and postsecondary institutions must develop a system-wide reform that addresses academic expectations, access to learning opportunities, high-quality learning instruction, resource allocation and how to utilize accountability measures for program planning.

In order to ensure that all students have equitable access to quality educational opportunities, the goals for secondary and postsecondary special populations students will be met through partnerships between state agencies and other organizations to identify academic needs to prepare students to meet workforce employment demands. Both secondary and postsecondary agencies collaborate with Michigan Occupational Special Populations Association (MOSPA) while secondary consults with the Bureau of Services for Blind Persons, Michigan Rehabilitation Services, Michigan Transition Services Association, Michigan Department of Education – Office of Special Education, and Michigan Department of Education - Special Populations Office. Partnerships between secondary, postsecondary and community organizations allows CTE secondary and postsecondary educators the opportunities to learn and apply strategies to educate and prepare special populations students to enter the workforce and to meet the needs of employers.

Secondary and postsecondary institutions do not discriminate based on race, age, sex, national origin, religion, disability, height, weight or marital status and has a State Board approved non-discrimination policy that applies to institution's operational functioning. Special population representation on occupational program advisory committees ensure that the needs of members of this group are identified and they are informed of available programs of study and the requirements for program completion. Program reviews completed by students and staff assess the diverse needs of secondary and postsecondary students and provide meaningful insight and a framework to understand the complexity of equity gaps in education and employment. Additionally, at the local level, secondary and postsecondary will disaggregate data to identify equity issues for underserved populations. MDE-OCTE and LEO-WD will continue to work with the tribal education directors to identify ways to meet the career education needs of tribal youth. To support this goal, CTE programs statewide will recognize the contributions of tribal enterprises to the community and make CTE programs and school counselors aware of tribal preference laws and employment opportunities for tribal students and all students within tribal enterprises.

MDE – OCTE also supports special populations through participating in the Michigan Interagency Transition Team (MITT) formed in 2019, which is comprised of various external and internal agencies that collaborate and focus on the needs of students with disabilities to prepare them to transition from secondary education into adult life. The student Educational Development Plan (EDP) that is addressed in Michigan's ESSA plan also outlines that students, specifically students with disabilities, English learners, and low-income students will be given individualized assistance in planning coursework to support progress toward educational and career goals and opportunities offered through CTE. During the review of the students' Educational Development Plans (EDP), Individualized Education Plan, and Transition Plan, students and parents will discuss educational career opportunities and available academic and financial supports that may be available to students with disabilities, English learners, and low-income students. The ESSA plan also states students

are encouraged to enroll in instructional programs that are non-traditional for their gender.^[CE(1)] Michigan's governor and legislature are also reviewing strategies to address upskilling Michigan's adult population (25 and older) for high-skill, high-wage careers through increased access to education, training, registered apprenticeship and credentialing.

The Comprehensive Local Needs Assessment (CLNA) Special Populations data analysis section will assist secondary and postsecondary institutions to identify disparities or gaps, students who are facing challenges, and create meaningful insights into program changes and recruitment and retention strategies. Technical assistance and professional development opportunities will be provided by both the MDE - OCTE, as well as the LEO - WD to identify strategies to eliminate barriers to increase the success of special populations students in career and technical education programs. Conferences such as the Career Education Conference, Career and Technical Education Data Workshop, Michigan Occupational Special Populations Association Conference, TRENDS Conference, Grant Dissemination Workshop, assist in identifying barriers and strategies which promote student success. Administrators, teachers, special populations coordinators, paraprofessionals, and counselors at the local CTE postsecondary and secondary institutions will address the needs of students and ensure all students have the resources to graduate, receive a recognized industry-recognized postsecondary credential and are prepared for in-demand employment.

Information on available programs of study will be advertised at the secondary and postsecondary levels through printed materials, websites, admissions applications, career fairs, and throughout the community and in their regions. Outreach to secondary and postsecondary students provides valuable information on secondary and postsecondary CTE programs and services to increase the enrollment of students in CTE programs. Secondary and postsecondary institutions will also promote equity and inclusion in their hiring practices by advertising available occupational job opportunities in diverse arenas, such as: The Hispanic Outlook, Crain's Business, the Michigan Chronicle, Women in Higher Education, the Higher Education Chronicle, and local newspapers.

- c. Describe the State's strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in section 122(d)(2) of Perkins V, including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and the Higher Education Act of 1965. (Section 122(d)(3) of Perkins V)**

Michigan's Career Readiness Cross-Sector Team is a MDE strategy to engage stakeholders in ACTION to transform Michigan's Career Preparation System and achieve the career readiness goals identified in Michigan's Top 10 Strategic Education Plan. These long-term goals reflect and align to the recommendations set forth in the study of Michigan's Career and Technical Education and Career Readiness System (May 2016), the Governor's Talent Investment Board

resolution (Sept. 2016), the Governor’s 21st Century Education Commission (Feb. 2017), the Michigan Career Pathways Alliance recommendations (June 2017), and The Marshall Plan (Feb. 2018). The Career Readiness Cross-Sector Team is part of MDE’s participation in the Career Readiness Network (CRN)—a Council of Chief State School Officers (CCSSO) initiative to support states in improving career readiness. The Career Readiness Cross-Sector Team includes representatives from employers, employer organizations, organizations representing K-12 and postsecondary educational institutions, and State agencies. MDE – OCTE and LEO – WD will continue to work together through the Cross-Sector Team, to collaborate on career readiness initiatives across funding sources. One task of the Cross-Sector team involves asset mapping of resources and funding. The objective is to identify opportunities for the education and workforce development communities to align and leverage resources, including the braiding of funding. The Cross-Sector Team will align with secondary and postsecondary efforts to promote and grow CTE by various means. This includes engaging employers and educators to comprehensively address workforce talent needs, including skills gaps, in key industries in regional areas statewide. This engagement will be achieved through existing state, regional and local workforce and economic development efforts. This process will be used to identify opportunities to leverage and align Workforce Innovation Opportunity Act (WIOA) resources and activities occurring at local workforce development agencies (Michigan Works! Agencies) with secondary and postsecondary CTE.

In addition, representatives from MDE – OCTE and LEO – WD will continue to regularly attend Michigan Future Talent Council meetings (the employer council required under WIOA), and Michigan Works! meetings, and collaborate across agencies on multiple initiatives related to delivery of education and workforce development services, administration of Perkins funding, and collaborate on aligning and utilizing education and workforce data.

MDE - OCTE will continue to work with other MDE offices in implementing statewide initiatives, including initiatives aligned with Michigan’s ESSA State Plan. The Michigan Integrated Continuous Improvement Process (MICIP) is a new statewide school improvement initiative and is a pathway for districts to improve student outcomes by assessing whole child needs to develop plans and coordinate funding. MICIP involves a shift in how we think about improving student outcomes (mindset) to engage in a comprehensive and iterative continuous improvement cycle (process) using a streamlined, integrated, web-based software application (platform). MDE – OCTE also continues to work with other offices to implement Multi-Tiered System of Supports (MTSS)—a comprehensive framework comprised of a collection of research-based strategies designed to meet the individual needs and assets of the whole child. MTSS intentionally interconnects the education, health, and human service systems in support of successful learners, schools, centers, and community outcomes. The MDE essential components of MTSS are: team-based leadership, tiered delivery system, selection and implementation of instruction, interventions and supports, comprehensive screening & assessment system, and continuous data-based decision making.

- d. Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of Perkins V for each of the purposes under section 124(a) of the Act. See Text Box 2 for the required uses of State leadership funds under section 124(a) of Perkins V. (Section 122(d)(7) of Perkins V)**

- (1) Conduct State leadership activities to improve career and technical education, which shall include support for:

- (A) Preparation for non-traditional fields in current and emerging professions

Local leadership funds will enable secondary and postsecondary institutions to work with local businesses to develop programs that lead to high-skill, high-wage and in-demand careers, including support programs for special populations and nontraditional students. Funds will be used for faculty, secondary and postsecondary partnerships to develop new courses, evaluate and/or modify existing courses, and consider new programs based on regional workforce needs and emerging programs.

Michigan allocates \$150,000 in nontraditional funds which support a gender equity consultant and special populations consultants within the MDE – OCTE and LEO - WD. Additional staff members contribute by working on special projects for non-traditional students such as nontraditional student data analysis. These staff members provide ongoing support and professional development to subrecipients regarding non-traditional students including technical assistance, support with grant activities within the annual application designed for the recruitment, retention, and completion of non-traditional students, and targeted technical assistance to regions not meeting non-traditional core performance indicators (CPIs), including assistance in regional improvement plan activities. These staff members provide ongoing support through telephone calls and emails; as well as present at several workshops and conferences throughout the year. Staff create an equity and special populations newsletter that is disseminated to all subrecipients. The funding supports non-traditional activities such as non-traditional CPI calculations. Funds are also used for nontraditional student recognition during the annual Breaking Traditions Award ceremony that recognizes students in secondary and postsecondary education who have found success in career and technical education programs nontraditional for their gender. These students serve as ambassadors for nontraditional career and technical education programs in their local schools, often assisting in the recruitment of nontraditional students by serving as leaders in nontraditional CTE programs.

New Recruitment of Special Populations (\$50,000):

The MDE – OCTE and LEO - WD have allocated \$50,000 for the new recruitment of special populations students. The MDE – OCTE and WDA - LEO staff will attend training for promising practices regarding Special Populations (POPS). The training will be in train-the-trainer format so that staff members can provide professional development to sub-recipients at both the secondary and post-secondary level. Additional funds will be used to provide technical assistance and/or professional development to subrecipients regarding special populations through activities geared towards their recruitment. These activities may include workshops, guest speakers and materials, creation of best practices documentation, and other activities deemed necessary. Funds may also be used for targeted technical assistance to subrecipients who are not meeting the 4S1 indicator (Nontraditional Program Concentrator).

(B) Individuals in state institutions

The State of Michigan allots 1% of the amount allocated to serve individuals in State correctional institutions and institutions that serve individuals with disabilities. A portion of those funds are granted to:

The Michigan Department of Human Services (MDHHS):

Young persons, both male and female, ages 12 to 21, who have been adjudicated by the courts for class one and two felonies, are remanded to the Michigan Department of Human Services the Bureau of Juvenile Justice's custody. Treatment programming in the facilities varies and placement is based on individual needs. The Bureau of Juvenile Justice is responsible for 80 young persons at any given time. Educational programming is a top priority at the two facilities (Bay Pines and Shawono), especially that offered by Career and Technical Education. The Bureau has two state-approved programs and funding grant administration is by "Inter-Agency Agreement." It is expected that, over the next five years, existing programs will be state approved and funded by Perkins.

The Michigan Department of Corrections (MDOC):

The Michigan Department of Corrections is utilizing the funds to update and expand career and technical education programs to ensure they are providing the skill sets required in the current job market. Special attention was given to current textbooks, equipment, and related supplies for CTE classrooms at various correctional facilities. The department conducts school improvement meetings for the CTE committee, administration, and school principals. The overall goal is to review, implement, revise, and improve career and technical education curriculum within MDOC. In addition, professional development training is provided for CTE instructors and administrative staff. Last year, the average monthly enrollment of prisoners in a CTE program was 2,106.

The programs that are available and offered are:

- Auto Mechanics
- Building Trades Carpentry
- Building Trades – Masonry/Concrete
- Building Trades – Plumbing
- CNC/Machine Tool/Robotics
- Commercial Truck Driving - CDL
- Computer Service Technician
- Custodial Maintenance
- Employment Readiness
- Food Technology
- Horticulture
- Optical
- Welding

A portion of Perkins funds support individuals with disabilities in state correctional institutions, including juvenile justice facilities, and educational institutions that serve individuals with disabilities. These funds are managed and distributed by the MDE - OCTE. Michigan's ESSA plan outlines one of Michigan's goals to improve the transition of children and youth to/from locally operated programs in their community. The transition team within the juvenile facility will

consult with CTE teachers to identify effective methods to support the student's transition to further education and/or career.

(C) Recruiting, preparing CTE teachers and faculty

LEO – WD and MDE – OCTE will provide multiple professional development opportunities for secondary and postsecondary educators, administrators, counselors, and instructional support personnel. These opportunities will include a community college dean's in-service for new and/or current occupational deans and the New CTE Administrator's workshop to introduce policies and regulations related to the use of Perkins V funding. These events also provide an opportunity for Deans and New CTE administrators to network and share best practices to promote the success of occupational students and programs of study.

Perkins V funds will be used to support occupational organizations and conferences such as the Michigan Occupational Special Populations Association (MOSPA), Michigan Community College Data and Evaluation Committee (MCCDEC), Michigan Educators' Apprenticeship and Training Association (MEATA), the TRENDS in Occupational Studies Conference, OCTE Fall and Spring Updates, Perkins Grant Dissemination, the CTE Data Workshop, and the Michigan Career Education Conference to support CTE instructors, faculty, administrators and industries working in CTE programs. These organizations and conferences support CTE educators, faculty and administrators to acquire innovative strategies to retain and prepare secondary and postsecondary students for a highly skilled workforce. Additionally, MDE – OCTE and LEO - WD will seek to enhance these professional development opportunities to ensure emerging occupational demands are addressed through secondary and postsecondary programs of study.

Secondary and postsecondary institutions use Perkins funds to support CTE instructors, faculty, administrators and career, academic and guidance counselors to partake in activities that will increase their teaching skills based on research and to improve community involvement. Secondary and postsecondary professional development opportunities also assist in the development and delivery of teaching and learning modalities, builds teacher and instructor confidence and competence, and promotes continuous evaluation of the current purposes and practices in the classroom to support student success.

The MDE – OCTE and LEO - WD will:

- Work with the Higher Education Teacher Education Preparation Programs throughout the state of Michigan to support their on-going efforts to recruit, prepare, and retain CTE teachers for secondary and postsecondary CTE programs;
- Invite higher education faculty to participate in MDE - OCTE and LEO – WD professional development events to foster continuous communication and collaboration;
- Actively strive to increase the number of secondary Education General programs offered to secondary and postsecondary students throughout the state to promote teaching as a viable career pathway;
- Continue to work closely with the MDE - Office of Educator Excellence and teacher preparation institutions to support alternate pathways for skilled professionals to transition into teaching careers;
- Partner with the Michigan Association for Career and Technical Education (MIACTE) to provide multiple new CTE teacher workshops annually in support of new CTE teachers.
- Provide New CTE Administrator Technical Assistance Workshops annually to support administrators who are new to leadership roles in CTE; and

- Provide multiple professional learning opportunities to support administrators, teachers, instructional support personnel, and paraprofessionals through annual events:
 - MDE - OCTE Updates
 - Early Middle College Getting-Started Workshop
 - Michigan Career Education Conference, including sessions on Understanding and Using CTE Data and Perkins Grant Management
 - Michigan Occupational Special Populations Association (MOSPA) Workshop
 - CEPD Summer Leadership Workshop
 - Michigan Educators Apprenticeship and Training Association (MEATA) Annual Conference
 - Annual Dean's Inservice
 - TRENDS in Occupational Studies Conference
 - Michigan Community College Data and Evaluation Committee (MCCDEC) Annual Data Workshop

Additionally, MDE - OCTE and LEO - WD staff will participate as requested as speakers at all curriculum specific association workshops to assure continuous communication and high-quality programs.

(D) Technical assistance for eligible recipients

Technical assistance will be provided to eligible recipients and state-approved secondary and postsecondary CTE programs through workshops on use of student and program performance and outcomes data for program improvement and use of labor market information. MDE - OCTE and LEO - WD staff will provide individual and group technical assistance to assist with accurate data reporting and interpretation of data reports. MDE - OCTE contracts for training and a toll-free help line to assist school districts with accurate data reporting. Perkins funds are also used to support an online data collection and reporting system to ensure accurate CTE data, alignment of data with other state K-12 data, and multiple data reports to support CTE program effectiveness, including an online interactive dashboard for CTE programs. In addition, technical assistance on reporting and data interpretation will be provided to subrecipients during onsite monitoring visits.

The LEO - WD will collaborate with the Michigan Community College Data and Evaluation Committee (MCCDEC) to determine disparities or performance gaps in CTE programs.

MCCDEC's major purpose is to provide technical assistance to Michigan community colleges in data collection, data reporting, and evaluation procedures. Perkins funds will support technical assistance workshops on the use of student and program performance, outcomes data, and the use of labor market information for program improvement.

Additionally, State leadership funds will be allocated to assist the community colleges in improving institutional capacity to collect the data.

- (2) Report on the effectiveness of such use of funds in achieving the goals described in section 122(d)(2) and the State determined levels of performance described in section 113(b)(3)(A) and reducing disparities or performance gaps as described in section 113(b)(3)(C)(ii)(II).

MDE - OCTE will utilize the funds to report on effectiveness in achieving the goals of the State Plan through online interactive dashboards that depict Perkins core performance indicators by race, gender, special populations, CIP code and building (<http://analytics.ptdtechnology.com/>). Districts and the public will be able to examine the impact of various factors on student and program outcomes and achievement gaps through these dashboards. In addition, MDE - OCTE will continue to collaborate with the Center for Educational Performance and Information (CEPI) to integrate secondary CTE data into the <http://MISchoolData.org> portal.

2. Implementing Career and Technical Education Programs and Programs of Study

- a. Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of study to be developed at the State level and made available for adoption by eligible recipients. (Section 122(d)(4)(A) of Perkins V)**

The MDE-OCTE requires all state-approved secondary CTE programs to develop a program of study, including secondary and postsecondary course work. MDE-OCTE works with regional and local agency CTE curriculum experts and CTE administrators, to review current programs of study and ensure they include academic and technical skills and career ready practices that students need for success in high school, postsecondary education, and/or the workforce.

At the secondary level, the programs of study support the Career Cluster model adopted by Michigan. These program standards provide students the required knowledge and skills for transition to postsecondary education and/or the workforce. In addition, Michigan adopted a 17th Career Cluster in Energy consistent with Michigan's needs. The 17 Career Clusters are a solid model because they have been validated by businesses and industries around the nation and include the academic and technical components of strong CTE programs.

At the postsecondary level, program requirements and course determination reside with the local boards of trustees at the institutions. LEO - WD approves courses and programs of study for participation in Perkins programs. All postsecondary occupational programs lead to either a certificate or degree, and all have transfer options available. Advisors work with CTE students to identify programs of study at the certificate and associate degree levels, as well as transfer options, articulation and transfer agreements and workforce development opportunities for future education and training. Transfer agreements are in place between the associate degree granting institutions and the university to align the student's coursework towards program completion and minimize duplication.

Award recognition is granted upon completion of an established number of credits, contact hours, and/or courses within a CTE program. There are two types of postsecondary awards: certificates and associate degrees; including, three classifications of courses: general education, supportive, and occupational specialty.

LEO - WD administers Perkins postsecondary and the WIOA, creating better coordination of services and identification of needs between the educational institutions and employers. Both programs focus on the development of career pathways through academic instruction and work-based learning opportunities for the attainment of industry recognized postsecondary credentials for in-demand careers.

Michigan state leaders in MDE – OCTE and LEO – WD have decided to utilize the reserve fund opportunity to further address the needs for better alignment between secondary and postsecondary educators. A competitive grant application process will provide funding to identify recognized postsecondary credentials and demonstrate how these credentials align with the program standards for high-quality CTE programs of study. Secondary and postsecondary Perkins eligible recipients must establish consortia and work collaboratively with local employees to identify credentials which employers agree to utilize for hiring and which will be used for mandated Perkins reporting. This bold initiative will foster collaboration and alignment between secondary, postsecondary, and business and industries, culminating in a postsecondary recognized credential.

b. Describe the process and criteria to be used for approving locally developed programs of study or career pathways (see Text Box 3 for the statutory definition of career pathways under section 3(8) of Perkins V), including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 1327 will—

The proposal for a new program of study begins with the Comprehensive Local Needs Assessment (CLNA). The gaps identified in the CLNA are used to determine new programs of study that meet employment demands at the local, regional and statewide levels. Labor market information will be analyzed to identify current, new, and projected industry demands throughout Michigan. Additionally, program advisory committees, inclusive of industry partners, special populations representatives, faculty and administrators, provide invaluable information about the skills required or lacking in CTE programs. Information garnered from advisory committees will drive the development and the criteria used to approve new programs of study or career pathways. Curriculum developed within an approved program of study will address industries' education and workforce needs.

The MDE - OCTE and LEO - WD will approve locally developed programs of study and career pathways. The MDE – OCTE and LEO - WD require all locally developed programs of study to complete a rigorous approval process at both the local, regional, and state levels, prior to being designated as a state-approved CTE program. Online resources such as the [New CTE Program Application Tool Kit](#) and the Michigan Community College Network provide clear step-by-step directions, resources, and templates to assist applicants throughout the process. Program approval requires the applicant to:

- Conduct a needs assessment to determine whether the program is consistent with the needs of the local, regional, or state economy;

- Determine credentials and hire teachers with the requisite skill set;
- Assess needs and provide teacher professional development;
- Establish a program advisory committee including a majority of business or industry partners;
- Implement program standards and technical and academic course content including career ready practices to support employability skills;
- Identify barriers and implement strategies to support special populations student enrollment and success in CTE programs; and
- Establish secondary-postsecondary program of study to assure a successful transition to postsecondary education and leading to a postsecondary credential

CTE state-approved program elements required at the secondary and postsecondary level will include the need to:

- Strengthen the academic, technical, and employability skills of students;
- Provide students with strong experience in, and understanding of, all aspects of an industry;
- Develop, improve, or expand the use of technology in CTE programs;
- Provide comprehensive professional development for academic, guidance, and administrative personnel, including CTE and academic teachers and faculty, counselors, special populations and instructional support, paraprofessionals, and administrators;
- Develop and implement evaluations of the programs carried out with funds under this title, including special populations;
- Provide services, activities, and instructional program offerings that are of sufficient size, scope, and quality to be effective; and
- Link secondary and postsecondary CTE. This includes articulations with 2+2+2 curriculum alignment, dual enrollment, direct credit, and other linkages

Following program approval and implementation, all programs are required to review student and program performance data to assure that the programs are meeting the academic and technical targets and industry needs.

i. Promote continuous improvement in academic achievement and technical skill attainment

To promote continuous improvement in academic achievement and technical skill attainment, the state-approved Program of Study must integrate core academics with CTE to ensure that CTE students are taught at the same level and proficiency as non-CTE students. The state-approved program of study will align secondary and postsecondary course work to assure that there will not be a duplication of course competencies or outcomes as the student transitions to postsecondary education.

Outcomes from student participation in CTE programs are continuously assessed to assure a foundation of skills and knowledge that will support student success and completion in CTE programs of study, and meet the skills needed by employers.

ii. *Expand access to career and technical education for special populations*

The Comprehensive Local Needs Assessment will allow secondary and postsecondary institutions to disaggregate data by subgroups, determine gaps in performance, and determine the inequities in services to expand access to CTE programs for special population students. Results from the assessment will allow institutions to develop targeted strategies to increase awareness, promote increased access and expand opportunities for special population students.

Additionally, the needs assessment will help to identify gaps and areas of overlap between CTE Programs of Study and WIOA services by identifying barriers, resources, activities, and support services across programs, which will improve coordination and expand student access, retention, and completion in CTE programs.

To further expand access to CTE programs for special population students, representatives of special population groups will participate on advisory committees and other committees to increase an awareness of unique needs of special population students and foster a system of support in CTE.

The Perkins Local Annual Application will require secondary and postsecondary institutions to include opportunities for special populations students to participate in work-based learning activities. Work-based learning provides an opportunity for students to learn about the workforce by participating in short- or long-term experiences such as visiting a job site, shadowing employees, or actually performing job functions at an employer site. Local secondary and postsecondary institutions will include activities that address inequities and expand access to CTE programs for special populations students. All groups of special populations students will be exposed to work-based learning activities regardless of status as a special populations student.

Secondary and postsecondary institutions will assist employers to understand the unique needs of special population individuals. Increasing employers understanding of the needs of special population individuals, affords special population students increased employment opportunities in high-skill, high-wage, and in-demand careers.

Secondary and postsecondary institutions will expand access for occupational students in careers that are non-traditional for the students' gender by providing outreach and recruitment about the opportunities available in CTE, the requirements for eligibility for enrollment in CTE programs, information on accommodations, work-based learning and employment opportunities, promoting CTE programs of study at the institution and in the community, and developing multiple strategies and service delivery techniques. Increased knowledge of CTE program requirements as well as support services will enable CTE

Technical Review Assistance and Compliance visits at secondary and postsecondary institutions will ensure that all students have access and equitable opportunities to Career and Technical Education. Compliance visits will also ensure that facilities, equipment, and classroom materials are accessible to students with disabilities allowing them to enroll and complete CTE programs of study.

iii. Support the inclusion of employability skills in programs of study and career pathways.

In addition to academic and technical skills, state-approved CTE programs of study will integrate career ready practices to assure that students have the requisite skills to function effectively in the workplace. Employers consistently identify the importance of employability skills as the critical component to be successful in all industry sectors. Work-based learning opportunities must be integrated into the program of study to assure that students are learning the essential skills of the business or industry they are preparing to enter. Progressively more intensive work-based learning opportunities will assist the learner's growth and understanding of their career field and all aspects of the industry. Incorporating core academics, specific technical competencies, hands on work-based learning skill development, and career and employability skills will ensure that CTE students have the essential requirements to be viable candidates and workers in high-skill, high-wage, and in-demand careers.

Advisory committee members representing the business or industry are key partners in assuring that programs remain current and responsive to the evolving workforce.

- c. Describe how the eligible agency will—
make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;**

- i. Make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;**

The MDE – OCTE will provide information on state-approved programs of study readily available to the public through Career and Technical Education Information System (CTEIS) website. This site provides easy access to the general public seeking information regarding state-approved CTE programs available in local school districts and at CTE centers statewide. In addition to program options, the site includes searchable data regarding student program performance at local, regional, and statewide levels. This valuable resource is available to students, parents, teachers, and school counselors.

In addition, Michigan will continue to support a dedicated CTE page on Michigan's student data portal, which provides an interactive map showing the location of all CTE programs and contact information for regional CTE administrators, links to other career education data portals, and

additional outcome reports for secondary and postsecondary CTE students:
<https://www.mischooldata.org/DistrictSchoolProfiles2/CareerAndTechnicalEducation/CareerAndTechnicalEducation.aspx>

Michigan also provides information on CTE programs through Pathfinder, an online Michigan career exploration tool targeted to middle school students, parents, teachers, and counselors:
<https://pathfinder.mitalent.org/#/home>

Michigan will also continue to develop its database of credentials offered by both secondary and postsecondary career and technical education programs through its participation in Credential Engine.

The MDE - OCTE also provides additional tools and resources to support state- approved programs on the MDE - OCTE website. Some of these are the Michigan Career Development Model; Work-Based Learning Manual; Program Advisory Committee Tool Kit; and many other useful tools to assist with career exploration and planning.

In addition to MDE - OCTE's statewide resources, local and regional programs provide outreach to make information about state-approved programs of study, guidance and advisement resources available to students, parents, and special populations. All school districts in Michigan are required to implement the Michigan Career Development Model to support all students in their career education and preparation.

At the postsecondary level, new student orientations, career guidance and academic counseling regarding approved programs of study, and career pathways, will be provided to current and potential CTE students. Information on dual or concurrent enrollment, linkages to work-based learning opportunities (such as apprenticeships and internships), resources and support services available to special populations, and counseling and career exploration will ensure students make good career and postsecondary choices.

Information regarding state-approved postsecondary programs of study is posted on the Michigan Community College NETWORK website, sponsored by LEO - WD, which is available to the public. Postsecondary institutions are required to describe in the local annual grant application, how they will make information about postsecondary CTE programs of study available to students, parents, and the community. Program faculty and counselors at the local level provide program information and resources to students through career preparation activities, i.e., tours, career assessment workshops, career fairs, job shadowing, posters, college websites, open houses for the community, course catalogs, and brochures.

Career counselors provide students and parents with information about apprenticeships and how these programs align with postsecondary credentials and employment. Additional information about apprenticeships may also be accessed through the Pure Michigan Talent Connect website located at <https://www.mitalent.org/apprenticeships>. Apprenticeships provide additional opportunities for students as career seekers, and more options for their work-based learning experience. Students can learn industry skills and earn wages with in-demand and high-wage occupations. Apprenticeships support students in their career options and meets the talent demand for employers and industry.

Michigan has a valuable resource through the Pure Michigan Talent Connect website. This website includes information for faculty, counselors, parents, students, administrators, and business and industry. The Michigan Education & Career Pathfinder, which the public can access from <https://www.mitalent.org>, provides interest inventories, career assessment tools, occupational profiles, job search techniques, interviewing skills, financial aid information, and links to all state public and private postsecondary institutions.

Michigan Training Connect, is the state's eligible training provider list which captures statewide training programs available to current and potential students looking to enhance their skills and credentials to seek gainful employment and advancement opportunities. This online tool can track participants as well as program participation and completion. Occupational students may benefit from Michigan Training Connect as these training programs may be supported with WIOA funding.

ii. Facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points

The MDE - OCTE supports the collaboration among eligible recipients by requiring all new secondary CTE program applications to be approved on a regional level.

The Career Education Planning District (CEPD) administrators meet regularly with the Career Education Advisory Councils (CEAC) to assure communication and collaboration, assuring that programs are responsive to the regional needs of business and industry. All regional state-approved programs must complete a classification of instructional program (CIP) self-review which is a method to assure continuous program improvement of local state-approved CTE programs and to assure that these programs are consistent with regional workforce needs. The education levels in each pathway span high school graduation to advanced degree, allowing individuals to enter, exit, and continue at multiple points within the career pathway.

Programs of study are developed based upon the state-identified and industry-recognized standards for each CTE program. Each state-approved program must meet all criteria as identified in 2b.i-iii. All state-approved secondary and postsecondary programs will be reviewed to ensure that they meet these criteria. The MDE - OCTE and LEO - WD will review and update the new program approval processes, identifying specific academic and technical competencies and outcomes. The Michigan CTE system leverages the WIOA in assuring secondary and postsecondary are aligned to workforce needs.

The LEO - WD Talent Development Liaisons (TDLs) engage employers and educators, regionally, to identify stakeholder needs with a focus on mid- and long-term talent development skills gaps in key industries across Michigan. The TDLs connect, coordinate and convene to ensure employers develop strong partnerships with education to create unique approaches to career pathways, including recruitment, training, and retention for youth, individuals in college, older adults, and returning citizens. The TDLs also engage Michigan's federally funded workforce development system (Michigan Works!). The TDLs will champion CTE via local/regional Career Education Advisory Committees (CEACs), convened by the Michigan Works! Agencies. The CEACs are cross-sectional groups, required by WIOA, representing education, industry, and other stakeholders, formed to address career and educational issues in their workforce delivery areas.

At least one secondary and postsecondary representative serves on each CEAC. The CEACs provide information regarding opportunities to support curriculum and professional development as well as initiatives to increase student success in CTE programs. Additionally, the CEACs will foster the collaboration between education and industry to develop relevant CTE programs, which will develop talent to fulfill industry needs. Regions are required to consult with the CEAC in developing the CLNA.

Collaboration between secondary and postsecondary eligible recipients will be a requirement of the Career Pathways Project Competitive Grant (see C.2.a). This is a collaborative grant opportunity offered by MDE - OCTE and LEO - WD to fund secondary and postsecondary collaborative partnerships for the purpose of developing seamless secondary-postsecondary programs of study aligned to local labor market needs and student interest; with learner-friendly on-ramps and off-ramps, that culminate in postsecondary recognized credentials. Grant recipient collaborative partners will work with employers to identify the credentials valued by employers and link those credentials to State CTE program standards and ensure aligned, high quality CTE programs of study. The purpose of this grant is to provide funding to Carl D. Perkins Secondary and Postsecondary Grant subrecipients to identify recognized postsecondary credentials and demonstrate how these credentials align with the program standards for High Quality CTE Programs of Study. Secondary and Postsecondary partners must work collaboratively with local employers to identify credentials which employers agree to utilize for hiring and which will be used for mandated Perkins reporting.

iv. Use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;

Michigan used State leadership funds to hold two statewide workshops to assist secondary and postsecondary subrecipients in understanding their regional labor market information (LMI) and alignment of their program offerings to regional labor market demand. Regional LMI consultants from the Office of Labor Market Information and Strategic Planning in the Department of Technology Management and Budget provided technical assistance to their regions. Subrecipients utilized the data in developing their Comprehensive Local Needs Assessment.

The LEO - WD and the MDE - OCTE under the State Board of Education have a strategic partnership with the Michigan Department of Technology Management and Budget (DTMB), Bureau of Labor Market Information and Strategic Initiatives (LMISI). The LMISI is the official source of demographic and labor market information for the state of Michigan. Annually, this partnership will allow the LEO - WD to provide Perkins program participants and stakeholders high quality demographic and labor market data.

The Career Education Planning District (CEPD) administrator, Talent Development Liaison (TDL), and/or the postsecondary representative will attend regional CEAC meetings to gather information on local and regional industry needs and to foster collaboration between education and industry. The CEAC and/or the postsecondary representative provides information about industry needs to the postsecondary institution to assist in professional and curriculum development, and to identify the competencies necessary for employment. These sector groups will include local business members, education, workforce development, economic development,

unions, and community-based organizations. Each Perkins recipient must convene occupational advisory boards, comprised of local stakeholders, such as area employers, to inform and further academic standards.

The LEO - WD and the MDE – OCTE have been diligently working to ensure secondary and postsecondary programs and programs of study are aligned with the State Workforce Board and/or local labor market data identifying industries and employers with demand for workers in high-skill, high-wage and in-demand occupations. Consultation from multiple stakeholders, including secondary and postsecondary educational institutions has been conducted. Additionally, in partnership with the DTMB, LMISI, measures have been taken to ensure CTE programs will be data and demand driven by the most current labor market information.

In addition to the data forums, a standardized CLNA template was developed and formally distributed to Perkins eligible institutions. Technical assistance was provided to secondary and postsecondary eligible agencies. Monthly conference calls were held between August and November to assist secondary regions in completing the CLNA, and instructional webinars were held in July and August. The CLNA template was developed based on Perkins V CLNA legislative requirements. Eligible secondary and postsecondary institutions completed the CLNAs using the template. Eligible institutions were required to demonstrate that CTE programs and programs of study are aligned to industries in need of workers for high-wage, high-skill, in-demand occupations identified by the State Workforce Board or regional labor market intelligence. The results of the CLNAs are included in the state of Michigan Perkins Plan. Ultimately, the CLNA will drive alignment with industry demand and programmatic decisions included in the Perkins V local applications.

iv. Ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;

To ensure that secondary and postsecondary students, including special populations students, have equal access to approved career and technical education programs, local programs will work closely with the community and stakeholders, such as employers.

Under Perkins V legislation, local programs are required to disaggregate their data by special populations, career cluster, and CTE program/programs of study to identify the equity gaps that may exist and implement strategies to ensure that all students have equal access to CTE programs. Disaggregated data can reveal equity gaps that may exist in enrollment and performance of special populations students. This information will be used to drive annual grant applications to address disparities.

CTE programs that promote equity among students must also focus on the socio-emotional elements of the student and foster a sense of belonging in the CTE program. According to ESSA, schools and classrooms need an integrated approach to social, emotional, and academic development and this begins at the local level. Local CTE programs must work with other entities, such as special education staff and other support staff to integrate social-emotional elements into the CTE classroom as well.

Administrators and other staff will also be engaged in professional development and learning that will support their work in addressing the unique needs of special populations.

Michigan's secondary and postsecondary institutions have special populations coordinators, counselors, and support staff which provide services to special populations to increase student success in programs of study, meet state-adjusted performance levels, gain the skills necessary for further learning, and for entry into high-skill, high-wage, or in-demand careers. LEO - WD and MDE – OCTE will continue to support secondary and postsecondary institutions' use of staff and encourage increases in support staffing when possible, to ensure equal access for special populations in approved CTE programs of study.

Strategies, activities, and student performance data will provide the evidence used to document special populations access to approved CTE programs of study as listed under the Act. All special populations students will be provided equal access through all mandatory federal guidelines – Title II, Section 504, Americans with Disabilities Act (ADA), Title VI, and Title IX. In addition, secondary and postsecondary CTE students will be provided with assistance and/or supplemental services, which will include:

- Formal, comprehensive needs-based assessment to identify interests, abilities, and unique needs, to develop an Educational Development Plan (EDP)
- Continuous orientation to opportunities available in CTE
- Requirements for eligibility for enrollment in CTE programs
- Special services coordinating with internal providers
- Professional development for faculty, staff and administrators
- Support for attendance costs
- Work-based learning opportunities
- Employment opportunities; and placement
- Accommodations for students with disabilities
- Counseling and academic advising
- Special populations representation on advisory committees
- Peer tutoring and professional instruction assistance
- Support services for English Learners

v. Coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;

The MDE – OCTE will present the Perkins State Plan to the State Board of Education to obtain their support for the development of career pathways and programs of study consistent with regional workforce needs. The State Plan will then guide the annual Perkins grant application process for the expenditure of these federal funds.

Executive Order 2007-4, effective July 1, 2007, established the Michigan State Board of Education (SBE) as the eligible agency for the supervision and administration of the responsibilities of career and technical education pursuant to the Perkins Act. The SBE is the sole state agency responsible for the administration of CTE in Michigan.

The responsibilities of the SBE include all of the following:

- Coordination of the development, submission, and implementation of the State plan required by the Perkins Act and the evaluation of the program, services, and activities assisted under the Perkins Act, including preparation for nontraditional fields;
- Consultation with the Governor and appropriate agencies, groups, and individuals including parents, students, teachers, and faculty preparation programs, representatives of businesses (including small businesses), labor organizations, eligible recipients, state and local officials, and local program administrators, involved in the planning, administration, evaluation, and coordination of programs funded under the Perkins Act;
- Convening and meeting at such time as the SBE determines necessary to carry out its responsibilities under the Perkins Act, but not less than four times annually; and
- The adoption of such procedures as the SBE considers necessary to do any of the following:
 - Implement state level coordination with the activities undertaken by the State of Michigan under Section 121 of the federal Workforce Investment Act of 1998, Public Law 105-228 1, as amended, 29 USC 2841 - - reauthorized in July 2014 as the Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128, Section 121;
 - Make available to the service delivery system under 29 USC 2841 within Michigan a listing of all school dropout, postsecondary education, and adult programs assisted under this subchapter; and
 - The responsibilities of the WDA under Section 511 of 2006 PA 341 that are required to be vested in the state's "eligible agency" by Section 121 of the Perkins Act, 20 USC 2341, are transferred to the SBE.

The Michigan State Constitution of 1963 requires the Michigan State Board of Education (SBE) to appoint a state superintendent of public instruction, who serves as chairperson of the SBE and as chief administrative officer of the Michigan Department of Education. The Superintendent is the Department official authorized to submit all applications and plans to the federal government and to administer programs under the several acts incorporated in this Plan.

The SBE consists of eight members who are elected at large for terms of eight years, as prescribed by law. The governor shall fill any vacancy by appointment for an unexpired term. The Governor shall be an ex-officio member of the SBE without the right to vote.

Executive Order 2007-4 also delegates the following responsibilities to the WDA:

- The SBE has delegated to WDA all responsibilities regarding postsecondary career and technical education that may be delegated under Section 121(b) of the Perkins Act, 20 USC 2341; and
- Except for the responsibilities delegated to the SBE under Section II of Executive Order 2007-4, WDA shall retain all other administrative authority, powers, duties, functions, responsibilities, and rule-making authority relating to postsecondary career and technical education under state and federal law.

vi. *Support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and*

MDE – OCTE and LEO – WD will support effective and meaningful collaboration to provide CTE students with experience in and understanding of all aspects of an industry. This is accomplished through the requirements of state-approved programs which are established based on the needs of business and industry. Michigan developed a work-based learning continuum to assure that students have access to progressively more intensive work-based learning opportunities.

All secondary state-approved programs must address the specific program standards and requirements as developed for each specific CIP code area. These program standards were developed in collaboration with business and industry standards, utilizing national and state workforce standards which were validated by business, industry, and postsecondary partners. Local programs conduct a gap analysis to demonstrate how these standards are utilized within each program. Program Advisory Committees composed of business and industry partners are required for all state-approved CTE programs and supported through a Program Advisory Committee Tool Kit.

Each secondary state-approved program is required to integrate four key components:

1. Integration of academic and technical skills to support core knowledge needs.
2. Laboratory hands-on learning to develop technical skills.
3. Work-based learning opportunities to further develop and apply skills.
4. Student leadership opportunities to support employability and career ready practices.

All postsecondary state-approved CTE programs are aligned with industry standards, and many of the curricula will be developed according to state, national, or international accreditation standards, or the institution may design programs using a Developing A Curriculum (DACUM) process, with the DACUM conducted by industry professionals in the appropriate fields. The industry standards will include application of principles within all areas of the industry.

The WIOA coordinates services and resources to meet the needs of employers. Perkins aligns with the WIOA to support the effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers so as to provide students with experience in, and understanding of, all aspects of an industry, CTE students will have work-based learning opportunities such as apprenticeships, internships, mentorships, and simulated work environments. Through a partnership with the Michigan Works! Agency/American Job Centers, students and parents can meet with employers, labor organizations, and training institutions to discuss apprenticeship opportunities.

Michigan Works! Agencies will provide career navigators to promote career awareness and education in support of the student's Educational Development Plan (EDP). The MiCareer Quest and Talent Tours provide secondary schools and postsecondary institutions, along with employers, the opportunity to provide hands-on career exploration and to showcase exemplary programs of study. These opportunities will provide students with industry-specific work experience and augmented course content with experiential application in the work setting.

Agreements between secondary and postsecondary ensure the alignment of curriculum and proper course articulation. All articulated and translated credit for postsecondary CTE will lead to certificates, degrees, credentialing and/or job placement.

vii. Improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V)

CTE state-approved programs provide services and supports to help all CTE students to be successful. All programs integrate academics and technical skills to support student core knowledge needs. This integration helps all students; especially special populations students who may have struggled academically, to gain a deeper understanding of the subject matter. The hands-on learning opportunities helps to support and reinforce learning. CTE programs align supports from special education when appropriate, and also provide the assistance of paraprofessionals in the classroom. All students in Michigan develop an educational development plan (EDP) in 7th grade which is reviewed and updated annually. Through the EDP process, students work with academic staff and counseling staff to assure that the student has a plan to advance their academic and career goals. Special populations students have additional supports and accommodations provided to assist these individuals toward achieving their goals and success in their CTE programs. Transition services through special education are also available to students who have an Individual Education Plan (IEP) and transition plan.

Postsecondary institutions will offer expanded services and support mechanisms through adult resource centers, counseling and advising offices, open laboratories, skills labs for additional competency building, tutoring and supplemental instruction services to improve outcomes and reduce performance gaps for CTE concentrators, including special populations. The EDPs will be developed to link students to academic support services, identify occupational and academic goals, and barriers to success.

d. Describe how the eligible agency, if it opts to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college high school, or competency-based education. (Section 122(d)(4)(D) of Perkins V)

All state-approved secondary CTE programs are required to align their programs with postsecondary programs and postsecondary partners serve on all secondary local program advisory committees. Each unique secondary CTE program works with their local, regional, or statewide partners to create a seamless transition for students. Michigan students, beginning in 9th grade, have the option of enrolling in dual enrollment courses at the postsecondary level. Many districts and regional agencies have developed Early Middle College programs to support student matriculation to the postsecondary level.

Other agencies have continued to support articulation agreements and direct credit programs. Several community colleges and universities have established statewide articulation agreements to support programs and students.

- e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs. (Section 122(d)(12) of Perkins V)**

Secondary

All local state-approved CTE programs are required to have a program advisory committee. Each program advisory committee must have a majority of their membership from the appropriate business and industry as related to the program employment area. In addition, program advisory committees must include parents, teachers, counselors, labor, and community representatives, (i.e., tribal organizations) in the planning, development, implementation, and evaluation of each CTE program. The [Program Advisory Committee Tool Kit](#) provides clear guidance and templates to support local agencies in this work.

In addition, MDE-OCTE has begun ongoing work with tribal education directors to share resources and information regarding CTE programs and participation of tribal youth in CTE. To help state CTE educators develop an increased understanding of the unique needs of this population one of the tribal education directors will be presenting at the annual State Career Education Conference. MDE staff meet regularly with the Confederation of Michigan Tribal Education Directors.

Postsecondary

Postsecondary state-approved CTE programs are required to have a program advisory committee. Each program advisory committee must have membership from the appropriate business and industry as related to the program employment area. In addition, program advisory committees must include parents, teachers, counselors, labor, and community representatives, (i.e., tribal organizations) in the planning, development, implementation, and evaluation of each CTE program.

CTE faculty, counselors, and administrators, including business and industry, will be invited to occupational advisory board meetings. Advisory board membership may include individuals who are representatives of business and industry, labor organizations, community stakeholders, and representatives of special populations. Advisory boards are in place for all occupational programs and provide input and recommendations for program planning, development, and evaluation. Advisory boards play a crucial role in providing direction for program development and/or elimination.

Additionally, all secondary and postsecondary Perkins subrecipients will consult with parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business, labor organizations, and representatives of Indian tribes and tribal organizations (as appropriate), as part of their Comprehensive Local Needs Assessment.

- f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V. See Text Box 4 for the statutory requirements for local applications under section 134(b) of Perkins V.**

The secondary and postsecondary local grant applications were revised during the transition year to include the statutes, assurances, core performance indicators, special populations categories, and other new requirements for Perkins V.

Secondary

See Attachment 1- Michigan Electronic Grant System Plus – MEGS+ (2019- 2020)

Postsecondary:

See Attachment 1 – Michigan Electronic Grant System Plus-MEGS+ (2019- 2020 Local Annual Grant Application)

- g. Include a copy of the comprehensive local needs assessment template and/or guidelines that the eligible agency will require of eligible recipients to meet the requirements of section 134(c) of Perkins V. See Text Box 5 for the requirements for the comprehensive local needs assessment under section 134(c) of Perkins V.**

Secondary:

See Attachment 2 – Perkins V Comprehensive Local Needs Assessment Secondary

Postsecondary:

See Attachment 2 – Perkins V Comprehensive Local Needs Assessment Postsecondary

- h. Provide the eligible agency’s definition for “size, scope, and quality” that will be used to make funds available to eligible recipients pursuant to section 135(b) of Perkins V.**

Each secondary and postsecondary developed their own definitions of size, scope, and quality as follows.

Secondary Size, Scope and Quality

In Michigan, CTE secondary programs are intentionally structured into 27 regions comprised of 53 career education planning districts, inclusive of **all** school districts throughout the state. This Regional structure has been in place since Perkins IV and assures access to state-approved CTE programs for all students throughout the state of Michigan.

Size

- At least one state-approved CTE program in five different career clusters must be offered by each Perkins Region, consistent with the needs identified by business and industry partners in the Region or state and the Comprehensive Local Needs Assessment (CLNA);
- At least ten state-approved CTE programs, identified by program serial numbers (PSNs), must be delivered within the Perkins Region, consistent with high-skill, high-wage, or in-demand occupations identified by business and industry partners within the specific Region or state and the CLNA; and
- Programs must be of sufficient size to be offered on a regular basis as relevant to the regional needs.

Scope

- Each state-approved CTE program must document a high-quality CTE Program of Study, demonstrating the secondary and postsecondary linkages, assuring the opportunities to transition from secondary to postsecondary education and career;
- Region members must be invited to annual Perkins Grant planning meetings and be provided the opportunity to provide input into their Regional Perkins Plan; and
- Region members must be invited to participate in the biennial CLNA, in order to provide input into the direction and planning of the Regional Perkins Grant.

Quality

- Program Advisory Committees are required for each state-approved CTE program. Program Advisory Committees must meet a minimum of twice annually to assure that the program is responsive to the needs of business and industry. Specific guidance is provided in the Program Advisory Committee Toolkit which is available in the Resource subsection of the MDE - MDE - OCTE website at: https://www.michigan.gov/mde/0,4615,7-140-2629_53968---,00.html;
- Each Region is required to achieve performance targets established for the Perkins Core Performance Indicators;
- Each state-approved CTE program is expected to make continuous improvement toward performance targets, consistent with the regional performance targets;
- Each state-approved CTE program must utilize the CTE state standards as identified for each CTE specific program area;
- Each state-approved CTE program must employ appropriately certified instructors who receive annual industry-related professional development which may include industry externships; and
- Each state-approved CTE program must meet the CTE program requirements which consist of:
 - Classroom Instruction, including Technical Skills, Academic Skills, and Career Ready Practices;
 - Hands-On Laboratory Learning Experiences;
 - Work-Based Learning Opportunities with Local Business and Industry Partners;
 - Student Leadership Co-Curricular Experiences, i.e. Career and Technical Student Organization (CTSO);
 - An online learning component may be incorporated into the CTE program;
 - Each state-approved CTE program of study is required to culminate in a recognized postsecondary credential;
 - Each state-approved CTE program learning environment must be barrier-free to assure access and equity for all students including special populations students; and
 - Each state-approved CTE program must demonstrate key components of a high-quality program of study.

Postsecondary Size, Scope and Quality

In Michigan, postsecondary CTE programs are structured into twenty-eight community colleges, three postsecondary associate degree granting institutions, and one Tribal College. This structure has been in place since Perkins IV.

Size

Career and Technical Education (CTE) Programs of Study (POS) must be of comparable size, based upon enrollment, as compared to enrollment in non-CTE programs and total college

enrollment. A program of study provides students an opportunity, via a non-duplicative sequence of academic and technical courses, to become a CTE concentrator. A concentrator is a postsecondary student who completes at least twelve credits of the academic and/or technical hours in a program of study; or completed a CTE program with fewer than twelve credits.

Scope

The scope of a program of study is defined through curriculum guidelines allowing students to gain a strong experience in and comprehensive understanding of all aspects of the industry, which prepare students to enter, including:

- Occupations and careers that comprise an industry, from basic to advanced;
- Principles of technology, labor and community issues, health and safety and environmental issues related to the industry;
- Knowledge of the planning, management, finances, technical and production skills for the industry related to the program; and
- Developing problem-solving skills and includes applied academics in the context of the student's career pathway selection.

CTE programs should include classroom and laboratory experiences and work-based instruction where appropriate. Instruction must be competency-based with either state or national curriculum or, when such curriculum does not exist, locally developed curriculum.

CTE programs and POS must include linkages between secondary and postsecondary CTE programs with evidence of operational agreements between secondary and postsecondary institutions. This may include, but is not limited to, articulation agreements, transitional curriculum, and dual credit.

Quality

Eligible recipients offer students the opportunity to participate in *high quality programs of study* that lead to two of the following three components: high-skill, high-wage, or in-demand occupations.

Michigan defines a *high-wage* career as one with an average hourly rate equal to or greater than the average hourly rate of all occupations as reported by the 2018 Occupational Employment Statistics program. The FY18 average hourly rate in Michigan is \$18.08 and an annual income of \$37,620 according to the Michigan Bureau of Labor Market Information and Strategic Initiatives.

An *in-demand* industry is defined as an occupation in which state, local, or regional labor market data show that demand exceeds projected employment supply.

High-skill occupations require an industry-recognized certificate, credential, postsecondary training, apprenticeship, or degree.

- Courses include rigorous, coherent CTE content aligned with challenging academic standards;
- Eligible recipient's POS must offer students the opportunity to earn a postsecondary level industry certification and/or licensure or an associate or bachelor's degree; and
- Postsecondary eligible recipients should ensure that academics are an integral component of all Perkins-funded CTE programs.

Application reviews, onsite monitoring, CTE program approval and program review as well as enrollment and follow-up results are measures of quality in addition to those requirements of the Perkins Act. These activities provide valuable data regarding the quality of programs and services and ensure secondary and postsecondary programs that do not align with labor market needs are improved, transformed, or closed.

3. Meeting the Needs of Special Populations

a. Describe the eligible agency's program strategies for special populations, including a description of how individuals who are members of special populations -

i. Will be provided with equal access to activities assisted under this Act;

The MDE - OCTE and LEO - WD will use the following strategies to meet the needs of special populations to support the successful transition from secondary to postsecondary education in CTE programs.

At the secondary level, special populations students are provided with equal access. Frequent reviews of data for special populations subgroups identify performance gaps for targeted support. Counselors and school administrators will assure accessibility to all students by providing information and resources to promote CTE program opportunities to special populations students. CTE local programs establish partnerships with the community, employers, and postsecondary programs to ensure students are gaining access to the opportunities that exist within their communities. CTE staff work with support staff, such as paraprofessionals, special education staff, counselors, and others to ensure students receive the required accommodations and or modifications needed to be successful in CTE programs and the workplace. The MDE – OCTE special populations coordinator collaborates regularly with staff from the Office of Special Education and also works with the Michigan Interagency Transition Team (MITT) to ensure coordinated services.

At the secondary and postsecondary level, special populations are afforded services necessary to promote equal access and success in CTE programs of study. Perkins funds support outreach to inform special populations students of the requirements for secondary and postsecondary programs of study and of non-traditional, high-skill, high-wage, or in-demand career opportunities. Information is provided to students through mentoring, simulation activities, marketing brochures, college catalogs, presentations, posters, career guidance, campus visits, campus websites, career fairs, guest speakers, community awareness, curriculum development, career counseling and academic advising, and in other materials.

Maintaining communication and collaboration with industry and employers via advisory board representation, internships, apprenticeships, and Michigan Works! Agencies will allow institutions to remain current on high-skill, high-wage, and in-demand careers, and the skills required to be employed. The information captured will be distributed to CTE students including special populations and be used to revise curricula and develop new programs. Non-traditional mentors and faculty allow special populations students to receive real-life experiences and be educated and trained by individuals employed in non-traditional careers.

Within CTE programs, all advisory committees are required to include in their membership, special populations student representatives and/or representation from appropriate student services offices. Special populations representatives on advisory committees help ensure that the specific issues and needs of special populations students are addressed at the program level.

ii. Will not be discriminated against on the basis of status as a member of a special population;

The MDE-OCTE and LEO-WD ensure recipients of Perkins funds comply with “least restrictive environment provisions” for Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments of 1972, Age Discrimination Act of 1975. Special populations students are not discriminated against on the basis of their status as members of special populations through the state’s support and monitoring of the requirements of civil rights legislation.

The State provides professional development and technical assistance to help recipients understand and maintain compliance with Civil Rights. The Civil Rights Compliance Review (CRCR) helps to develop and implement strategies and guidelines that prevent discriminatory practices for all special populations groups.

At the secondary level, Perkins special populations students have equal access to CTE programs. The application process to enroll in a program is open and inclusive to all students. Students are accommodated based on identified needs. For example, English learners (ELs) receive necessary bilingual support. According to ESSA, the percentage of ELs in American public schools has increased nationwide and there are provisions in ESSA to ensure ELs receive a high-quality education. This high-quality education must also be reflected in the CTE classroom. Students with disabilities receive accommodations/modifications according to their Individual Education Plan (IEP) and all categories of special populations students receive the support required for their specific needs.

Secondary and postsecondary special populations students participate in an educational environment that provides academic, technical, and employability skills that meet the same expectations as other students. Institutions are required to have board-approved policies of nondiscrimination available to students, staff, and the public, and to publish written procedures for filing complaints. Additionally, institutions are required to provide information describing how they will prevent discrimination against members of special populations. Annual risk analysis determines onsite monitoring, which includes a review of the institution’s non-discrimination policies.

In the annual Perkins applications, recipients assure nondiscrimination practices by describing the:

- Process for providing assistance to special population students, as needed;
- Activities for recruitment, enrollment, support services, accommodations, and placement services; and
- Monitoring to ensure that no discrimination takes place.

iii. Will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;

Students within special populations will be required to meet the same rigorous academic and technical standards as their non-special populations peers. Special population students may need accommodations to accomplish technical and academic standards; however, they are held to the same program requirements to meet or exceed State determined levels of performance. Achieving program standards will prepare special populations students to further their learning and/or be competitive when applying for high-skill, high-wage, or in-demand occupations.

The local annual grant application will require secondary and postsecondary institutions to identify and describe the supplemental services (e.g., modification of curriculum delivery strategies such as online courses, equipment and classroom modification, language support, academic support, academic integration, tutoring, counseling, career advising, and academic advising and attendance costs) that will be provided for individual special population groups to help them succeed in programs of study leading to high-skill, high-wage, or in-demand occupations and to meet or exceed state adjusted levels of performance.

Institutions must conduct a formal assessment to identify needs and/or barriers for special populations students. The assessment informs, where possible, the development of an educational development plan (EDP), individualized education plan (IEP), transition plan, and interventions that can be applied to help students meet or exceed the state adjusted levels of performance and the successful retention and completion of programs of study.

iv. Will be provided with appropriate accommodations

Based on the results of the formal assessment the student's EDP will drive what accommodations, if any, will be provided. Additional resources may include extended test time, tutoring services, equipment modifications, readers, open laboratories, and skills labs for additional competency building and other interventions as needed for success. Students will receive continuous follow-up to assess and/or evaluate the appropriateness of the accommodations.

CTE staff will collaborate with special populations counselors/coordinators, special education staff, and other ancillary staff to ensure students have the appropriate accommodations, support staff, assistive technology, and other supports so that they can succeed in a CTE program.

v. Will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)

All CTE students, including special populations students, will have the opportunity to participate in work-based learning opportunities which will include field trips, job shadows, career fairs, in-classroom industry presenters, apprenticeships, and other opportunities as appropriate to their interest and career specific area.

The implementation of the comprehensive local needs assessment will require local programs to understand industry workforce needs by examining labor market data. This will lead to local programs focusing on industry driven needs, which in turn allows for students to experience work-based learning opportunities which are in alignment with the current needs of employers.

Special populations students will receive information regarding work-based learning opportunities through their program, counseling, and academic advising. Institutions are required to create and expand partnerships with business, industry, and community stakeholders. With this goal in mind, programming will include developing relationships with employers and connecting students with work-based learning opportunities.

Institutions will monitor and evaluate the resources and services available at the work-based learning site to assure special populations students are fully integrated in the work setting. The worksite will provide assistance and accommodations to support the development of academic, technical and essential career ready skills required for success in each student's chosen program of study.

The LEO-WD will make concerted efforts to align with the WIOA to provide career development services that support continued preparation of special populations for work-based learning experiences and employment in high-skill, high-wage, or in-demand careers. Developing activities that meet the above criteria are essential for state-approval of activities in occupational programs.

The State is also aligning CTE goals with both the Individuals with Disabilities Act and Americans with Disabilities Act by effectively working with transition partners such as the Michigan Department of Education – Special Education, Michigan Rehabilitation Services, and Bureau of Services for Blind Persons by developing shared goals that will enable students to be successful in CTE programs.

4. Preparing Teachers and Faculty

- a. Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)**

The MDE – OCTE and LEO – WD will:

- Work with the higher education teacher education preparation programs throughout the state of Michigan to support their on-going efforts to recruit, prepare, and retain CTE teachers;
- Work with Special Education, Transitions, and the Michigan Occupational Special Populations Association (MOSPA) to support specialized professional development opportunities that

provide the knowledge and skills needed to work with and improve instruction for teachers in support of their work with special populations;

- Collaborate with the Office of Educator Excellence in MDE to support recruitment and preparation of education personnel to meet the needs of CTE including establishing alternative routes to CTE teacher certification;
- Support recruitment and orientation for CTE faculty with the same standards as those applied to the academic faculty. Recruiting techniques such as ad placement with newspapers, national trade journals, and web-based services are used to recruit faculty, administrators, and specialized instructional support personnel. Utilizing a wide range of recruitment strategies ensures postings are received by a diverse (under-represented) audience that possesses the technical skill requirements necessary for the position. Specific advertising locations, directly related to the discipline of the faculty position, are identified and postings in national journals (example: Chronicle of Higher Education) are available for review. Existing faculty and administrators recruit industry professionals to become faculty through advisory committee participation. Advisory committee members also serve as adjunct faculty and often become candidates for full-time positions when full-time positions become available;
- At the local levels, secondary and postsecondary will review student demographic enrollment data and develop recruitment strategies to create a diverse instructor workforce that reflects learner populations;
- Encourage faculty, including CTE faculty, to attend in-services that provide professional development regarding teaching and learning to assist with the transition from business and industry to education, including online (distance) learning;
- Provide professional development and training to assess student growth and identify areas to target for improvement, to identify training needed to meet CTE student needs, and to identify relevant curriculum rooted in institutional or industry- approved standards;
- Require institutions to develop processes and procedures for faculty to ensure that all students, including special populations, are treated with respect, and have access to support services to address any access issues within the educational environment;
- Support special populations coordinators and advisors to attend the annual Michigan Occupational Special Populations Association (MOSPA) and the Trends in Occupational Studies and Michigan Career Education annual conferences. These professional development opportunities provide a forum for postsecondary professionals to collaborate with secondary educators, employers, and occupational vendors to address the unique needs of special populations students, share best practices, and to strategize techniques to assist special populations students successfully transition from school to work;
- Provide ongoing technical assistance and support to teachers, faculty, administrators, and specialized instructional support personnel as well as CTE teacher professional associations; and
- Collaborate with Michigan Association of Career and Technical Education to provide support to CTE teachers and administrators.

C. Fiscal Responsibility

1. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—

The eligible agency will approve eligible recipients for funds under this Act through an online application process. The criteria and process for how Michigan will approve eligible recipients for funds under the Act will strictly follow guidelines which are established by Perkins V, Education Department General Administrative Regulations (EDGAR), Uniform Grant Guidance (UGG), and state allowable uses of funds. The eligible recipient will use the CLNA in order determine what activities they will request funding for in the application.

a. Each eligible recipient will promote academic achievement

Eligible recipients will promote academic achievement through activities within the application and the criteria for determining the activities should be informed by the CLNA. The eligible agency will approve applications for funding only if each secondary and postsecondary subrecipient application ensures that academic achievement has been included and addressed. In addition, core performance indicators (CPIs) aligned to ESSA (secondary) and WIOA (postsecondary) are reviewed, and each recipient will develop and implement a strategy for improvement or continuation of the CPIs on a regular basis. All eligible recipients are required to utilize a program quality self- assessment, such as the Academic Quality Improvement Program (AQIP) (postsecondary), and the Classification of Instructional Programs Self-Review (secondary) to ensure programs promote academic achievement.

b. Each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential

The eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential by including activities in the local annual application. Each eligible recipient must ensure there is a plan for continuous skill attainment to meet or exceed the State Approved Levels of Performance. In addition, CPIs will be reviewed, and strategies will be developed and implemented for improvement on an annual basis. All institutions will be required to utilize their local CTE program advisory committees to make certain that the appropriate technical skills match the program of study and to develop and implement a program of study that leads to an industry recognized postsecondary credential. Finally, all eligible recipients will be required to utilize a program quality self- assessment, review certification/licensing data, as well as student placement results, to ensure appropriately rigorous skill attainment.

c. Each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations.

Eligible recipients will ensure the CLNA takes into consideration local economic and education needs through consultation with the CEAC associated with their local Workforce Development Board. In consultation with the CEAC, the eligible recipient will review regional Labor Market Information and discuss short- and long-term talent needs for the region, which identifies in-demand industry sectors and occupations. The Michigan Department of Technology,

Management and Budget, Office of Labor Market Information and Strategic (DTMB – LMI) Planning will continue to provide information, instruction, and technical assistance to eligible recipients regarding the use and interpretation of Labor Market Information for the CLNA. The DTMB - LMI will provide eligible recipients with contact information for their regional representatives so that the eligible recipients can receive continued technical assistance for their CLNA.

2. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed—

- a. Among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace; and***

Michigan will utilize the 5 percent Reserve for a competitive grant initiative benefitting both secondary and postsecondary called the Career Pathways Project Grant. With the option of increasing to 15 percent in subsequent years. As described under section C.2.a, Career Pathways Project (CPP) grant recipients will utilize the Perkins V credential selection criteria checklist based on the criteria outlined in the July 2019 AdvanceCTE publication, "Measuring Secondary CTE Program Quality: Recognized Postsecondary Credential Attainment." See checklist below:

CPP grant recipients will utilize a credential validation employer survey tool developed with the Michigan Career Readiness Cross-Sector Team, to identify and validate credentials for the Perkins V secondary indicator of program quality. CPP grant recipients will also submit a standards alignment form that documents the alignment between the identified credentials and the CTE program standards at both the secondary and postsecondary level and a statewide credit agreement form. The credential selection process will follow 5 steps:

- Step 1: Research potential industry recognized credentials;
- Step 2: Administer Credential Validation Employer Survey Tool to regional/local employers to validate and/or identify credentials that are required or preferred by regional/local employers for use in hiring or promotion decisions;
- Step 3: Complete Credential Selection Criteria Checklist;
- Step 4: Complete Standards Alignment Template; and
- Step 5: Identify credential name and vendors for all districts administering the credential.

The credential tip sheet will be key in scaling up the credential work carried out by the CPP grantees. The grant deliverables will include forms, templates and instructions that will allow for easy adoption, implementation, and successful use by all programs in the state. Grantees will receive ongoing support and assistance to ensure that the grant deliverables provide implementation-ready tools for districts across the state.

Michigan will utilize the 10 percent funding level for state leadership activities, of which \$150,000 will be allocated for nontraditional training and employment. In addition, \$197,600 will be allocated for corrections. The remaining state leadership funds will be distributed using the 60 percent/40 percent split between secondary and postsecondary. By utilizing this split, Michigan can distribute funds which will most effectively create the needed skills base

for all students involved in CTE. The Carl D. Perkins funding for Michigan is the only federal funding focused on high school students. At the secondary level, we are able to promote equity and access for all students at no additional cost. Students are able to enter a career and technical education program and develop key proficiencies. The intent of Perkins is to start students out on a career path in high school and continue their studies at the postsecondary level. CTE programs promote the importance of high quality and seamless transition to postsecondary. Michigan has successfully offered multiple options for students at the secondary level in career and technical education through dual enrollment, articulated credit, direct credit, concurrent enrollment, and early middle college opportunities. The 60/40 split is based on the geographical availability of state-approved career and technical education programs. Michigan's postsecondary office serves 28 community colleges and four universities that cover a percentage of the State. While the secondary office serves 27 regions and covers 100 percent of the State of Michigan.

b. Among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace.

Funds will be distributed among consortia members, based on data, to most effectively provide students with the skills needed to succeed in the workplace. The following data sets will be utilized to calculate the secondary Perkins funding formula at the local educational agency (LEA) level:

- Thirty percent will be distributed in proportion to the latest census count of individuals aged 5-17 residing in the district served by the LEA as a percentage of the state total. To be inclusive of charter schools, the most recent NCES student membership data will be used when no census data is available; and
- Seventy percent will be distributed in proportion to the Title I poverty counts for each district served by the LEA as a percentage of the state total.

Perkins V requires the distribution of funds available to eligible postsecondary and adult occupational education programs within the state. The funds represent the community colleges portion of the 85 percent of the state's base grant for basic programs.

Funds generated by the formula stated in above will be pooled at the regional level. Each region will receive its proportionate share based on the grant total of the constituent school district and public-school academies' generated amounts.

3. For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 131(a)-(e) of the Act and describe how these allocations are distributed to local educational agencies, areas career and technical education schools and educational service agencies within the State. (Section 131(g) of Perkins V)

Funds generated by the formula will be regionally distributed to secondary recipients. Each region will receive its proportionate share based on the grand total of the constituent school district and public-school academies (PSA) generated amounts.

Public school academies (PSAs, also known as charter schools) and schools funded by the Bureau of Indian Affairs will be treated as LEAs for the purpose of receiving approved expenditure reimbursement from the region.

Region	CTE Perkins Fiscal Agency	Allocation
01	Gogebic-Ontonagon Intermediate School District	\$ 111,194
02	Delta-Schoolcraft Intermediate School District	\$ 279,789
03	Eastern Upper Peninsula Intermediate School District	\$ 95,870
04	Alpena Public Schools	\$ 196,517
05	Wexford-Missaukee Intermediate School District	\$ 642,611
06	Clare-Gladwin Regional Educational Services District	\$ 356,236
07	Mecosta Osceola Intermediate School District	\$ 364,691
09	Muskegon Area Intermediate School District	\$ 392,155
10	Gratiot-Isabella Regional Educational Services District	\$ 458,643
11	Tuscola Intermediate School District	\$ 371,381
12	Ottawa Area Intermediate School District	\$ 408,347
13	Kent Intermediate School District	\$ 1,409,496
14	Clinton County Regional Educational Services Agency	\$ 976,993
15	Genesee Intermediate School District	\$ 1,108,448
16	Macomb Intermediate School District	\$ 1,789,947
17	Livingston Educational Service Agency	\$ 183,811
18	Oakland Schools	\$ 1,694,835
19	Berrien Regional Education Service Agency	\$ 639,392
20	Kalamazoo Regional Educational Service Agency	\$ 567,828
21	Calhoun Intermediate School District	\$ 521,510
22	Hillsdale Intermediate School District	\$ 572,614
23	Washtenaw Intermediate School District	\$ 456,145
24	Detroit Public Schools Community District	\$ 2,670,553
27	Bay-Arenac Intermediate School District	\$ 314,786
28	Saginaw Intermediate School District	\$ 427,277
29	Wayne Regional Educational Service Agency	\$ 2,744,206
30	Monroe Intermediate School District	\$ 227,688
	TOTAL	\$ 19,982,963

Preliminary Secondary CTE Perkins Regional Allocations 2020-21

*Please note that region numbers 8, 25, and 26 are not listed as they were previously assigned to Perkins IV regions and with the new Perkins V regional configuration region numbers not used previously assigned to the new Perkins V regions.

4. For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.

Each postsecondary institution will receive an amount that bears the same relationship to the number of Pell grant and Bureau of Indian Affairs (BIA) recipients enrolled in occupational education programs. Information is not maintained at the federal, state, or local level as to the program in which Pell recipients are enrolled.

An alternate method to determine an estimated occupational education Pell recipient, as required in the "general rule," was established. Consideration will be given to identifying alternate data for economically disadvantaged. Each data set will contain a duplicated headcount with that of the Pell and BIA recipients.

The Michigan Community College data inventory will identify and audit all student contact hours by course content submitted by the community college. The same percentage of occupational education student contact hours to total student contact hours will be applied to the community colleges' total Pell and BIA recipients to determine estimated occupational education Pell and BIA recipients. For the four universities that fulfill a community college role, the number of Pell grant and BIA recipients in occupational education programs will be used. The pre-occupational student counts may be included for the four-year colleges because the students are being served through Perkins activities, and they are considered occupational students by definition.

The "waiver for more equitable distribution" is not necessary since the actual formula is being implemented. The only deviation is the method of determining the estimated number of occupational education Pell and BIA recipients.

Preliminary Postsecondary Perkins Local Annual Allocations
2020-21

	Institution	Allocation
1	Alpena Community College	\$110,974
2	Bay College	135,839
3	Delta College	722,075
4	Glen Oaks Community College	50,000
5	Gogebic Community College	84,148
6	Grand Rapids Community College	1,007,440
7	Henry Ford College	1,172,173
8	Jackson College	406,393
9	Kalamazoo Valley Community College	612,920
10	Kellogg Community College	475,326
11	Kirtland Community College	196,891
12	Lake Michigan College	231,247
13	Lansing Community College	880,443
14	Macomb Community College	1,291,480
15	Mid Michigan College	334,181
16	Monroe County Community College	191,649
17	Montcalm Community College	140,352
18	Mott Community College	822,704
19	Muskegon Community College	221,492
20	North Central Michigan College	99,829
21	Northwestern Michigan College	255,867
22	Oakland Community College	891,914
23	St. Clair County Community College	235,926
24	Schoolcraft College	592,084
25	Southwestern Michigan College	151,168
26	Washtenaw Community College	675,536
27	Wayne County Community College District	1,038,804
28	West Shore Community College	85,607
29	Bay Mills Community College	101,692
30	Ferris State University	202,223
31	Lake Superior State University	90,865
32	Northern Michigan University	128,758
	TOTAL	\$13,638,000

- 5. Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education. (Section 131(a)(3) of Perkins V)**

Within the regional funding structure, adjustments are not necessary for changing school boundaries and PSAs because all agencies are automatically considered eligible participants and can benefit from Perkins funding. The use of Title I eligible counts and National Center for Educational Statistics (NCES) student membership data in the formula provides for the inclusion of PSA data, which is not available by using the census data.

- 6. If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—**
- a. include a proposal for such an alternative formula; and**
 - b. describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V)**

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

No waiver has been requested.

- 7. If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—**
- a. include a proposal for such an alternative formula; and**
 - b. describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the State that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution. (Section 132(b) of Perkins V)**

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

No waiver has been requested.

The state of Michigan plans to allocate postsecondary funding as directed in Section 132(a) of Perkins V and has no plans for an alternative allocation formula at this time.

8. **Provide the State's fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary's annual determination on whether the State has maintained its fiscal effort and indicate whether the baseline is a continuing level or new level. If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)**

Policy

The MDE - OCTE is required to document and implement policies and procedures for the annual maintenance of effort (MOE) calculations, including retaining copies of supporting documentation. The following provisions must be addressed in the MOE methodology procedures:

1. Calculations include both Michigan's fiscal effort for CTE in the aggregate and on a per-student basis.
2. Assurance that the procedures will be followed annually and in writing, and
3. The methodology:
 - Includes all categories of state expenditures on CTE;
 - Includes student counts for its CTE programs;
 - Documents the sources of the expenditure data and student counts used in the calculations;
 - Be applied consistently; and
 - Provides a procedure and schedule to review annually the categories of state expenditures, and if necessary, amend the methodology to add new categories.

Procedures

1. **Categories of State Expenditures for CTE.**

The MDE - OCTE methodology uses the following categories of funds:

- State Administrative funds (MDE - OCTE Appropriation);
- State School Aid Appropriations, Section 61a(2) funds; and
- Postsecondary/Community College Services Appropriation (LEO – WD Appropriation).

These fund sources are used to calculate state effort on an aggregate and per-student basis and include all state funds expended on CTE. To ensure that this methodology included all categories of state expenditures for CTE, the MDE undertook a review of all sources used in the past as well as other potential funding sources within the MDE – OCTE and other state agencies (see review of all fund sources). The MDE - OCTE reviewed each potential Source to ensure it met the definition of CTE and was a reliable source of funds. The funding sources in this methodology meet both of these requirements.

The MDE - OCTE is confident these funding sources are reliable and capture the true integrity of Michigan's CTE program. Further, we believe these funding sources will remain relatively constant, not fluctuating from year to year.

2. Source of Student Counts

Student counts will be taken from the student enrollment form, enrollment of CTE participant (secondary and postsecondary) as reported in the consolidated annual report.

3. Sources of Expenditure Data

Annually, the Michigan Legislature authorizes the use of state, federal, and restricted funds for use by each state agency, including the MDE, through an appropriation act. Each source of funds can be tracked to a line item in an appropriations act. All budgets for appropriated state funds are entered into the Statewide Integration Governmental Management Applications System (SIGMA), the statewide accounting and budgetary control system. All expenditures incurred against state funds are reported in SIGMA. Using SIGMA Financial (BQ90LV2), the fiscal year, agency code, fund code, and the appropriation number, the MDE can document the amount spent towards each appropriation.

The MDE's appropriation act contains a line item for the MDE - OCTE. The line item includes an amount of general fund to be used for the administration of CTE programs. Accordingly, the amount of funds expended on CTE administrative costs is documented by running the correct report in SIGMA Financial (BQ90LV2). This is also the method through which funds expended on State School Aid Appropriations, Section 61a(2) and the Talent and Investment Agency funds are documented.

- MDE - OCTE: SIGMA Financial, BQ90LV2, Fiscal Year 2019, Agency 313, Fund Code 1000;
- LEO - WD: SIGMA Financial, BQ90LV2, Fiscal Year 2019, Agency 086, Fund Code 1000; and
- State School Aid, Section 61a(2).

4. Consistent Application from Year-to-Year

The MDE - OCTE uses this methodology consistently from year-to-year. Any proposed amendments to the methodology will be addressed as specified in the next paragraph.

5. Procedure and Schedule

Each year, beginning in November, MDE - OCTE staff begin gathering the necessary data to calculate MOE, and begin to conduct the appropriate calculations. Additionally, MDE - OCTE Staff will review all funding sources benefitting CTE. If MDE - OCTE staff determine that a funding source should be included in the MOE calculation that is not included in the methodology, MDE - OCTE will document the

funding sources, and the expenditure data that the funding source does in fact benefit CTE, as defined in the statute, and any reasons why the funding sources were not included in prior years' MOE calculation.

- No additional funding sources were identified

If an amendment is necessary, the MDE - OCTE will draft a proposed amended MOE methodology and submit it along with the supporting documentation to the Office of Assistant Secretary for Career, Technical and Adult Education (OCTAE) for approval. Once approval is obtained, the MDE - OCTE will finalize the amended methodology and maintain all documentation. All amendments to the methodology will be submitted to OCTAE by December 31, prior to conducting the final MOE calculation for the year in question. The approved amended methodology will then become the methodology used in future years.

REVIEW OF ALL FUND SOURCES

1. Fund Sources Included in MOE

Each funding source used in the MOE calculation takes into account (1) whether the cost category meets the definition of CTE in the statute, (2) the source of the funding category, (3) which entity determines the amount of funding for the category that must be used for CTE, and (4) under state administrative funds, a list of the types of costs included in that category.

○ State Administrative Funds

These funds are directly appropriated by the Michigan legislature for use in the administration of the CTE program. The type of costs included in this category include salary, equipment, supplies, and travel associated with the development of the state plan, reviewing local plans, monitoring, and evaluating program effectiveness, and providing technical assistance. As such, this cost category meets the definition of CTE in the statute. All expenditures incurred for this funding source can be determined by running the appropriate expenditure report in SIGMA.

○ MDE Appropriation for MDE - OCTE Building Occupancy Costs

The MDE - OCTE moved into a state-owned building during the middle of fiscal year 2009. Occupancy charges are paid with state funds that can be tracked through SIGMA. These expenditures meet the definition of CTE as these costs are necessary for the administration of the CTE program. The MDE determines the amount of occupancy charges that can be allocated to Perkins through the calculation noted in procedure 3.

- *During the December 2012 review, these funds were removed from the calculation when it was determined they were not stable or sustainable.*

○ State School Aid Appropriations, Section 61a(2) Funds

These funds are directly appropriated by the Michigan legislature for use by the MDE - OCTE in the supervision of CTE in the districts. As such, this cost category meets the definition of CTE in the statute. All expenditures incurred for this funding source can be determined by running the appropriate expenditure report in SIGMA.

- **Center for Education Performance and Information (CEPI) Funds**

CEPI is the state agency responsible for warehousing all educational data in Michigan, including data related to CTE. CEPI maintains the student data system for the state of Michigan, as well as information on educational personnel (REP). It is on these data systems that all the student and personnel information relevant to Perkins is maintained. As CEPI manages the data systems relevant to the provision of Perkins, these activities meet the definition of CTE as stated in the statute. State expenditures in this category are determined by conducting the cost allocation calculation described in procedure 3.

- *During the December 2012 review, these funds were removed from the calculation when it was determined they were not stable or sustainable.*

- **Department of Education Office of Educator Excellence Funds**

Office of Educator Excellence is an office within the MDE. This office is responsible for issuing professional licenses to Michigan teachers. As such, this office is responsible for the issuance of all CTE teacher licensing and therefore directly benefits career and technical education as defined in the statute. State expenditures in this category are determined by conducting the cost allocation calculation described in procedure 3.

- *During the December 2012 review, these funds were removed from the calculation when it was determined they were not stable or sustainable.*

- **Department of Labor and Economic Opportunity/Workforce Development - Postsecondary/Perkins-Postsecondary Appropriation**

The LEO – WD appropriation act contains a section for postsecondary education programs, with a specific line item for general fund/general purpose funds. A portion of these funds, as determined by the LEO - WD, is distributed to the Postsecondary/Community College Services Unit to administer the Perkins program at the postsecondary level. As such, this category of cost meets the definition of CTE as defined in the statute. All expenditures incurred for this funding source can be determined by running the appropriate expenditure report in SIGMA.

2. **Fund Sources Excluded from MOE**

This section contains explanations as to why these funding sources are excluded from the MOE methodology.

- **Local Self-Reported Contributions (Secondary and Postsecondary)**

The MDE - OCTE is not required to include local costs in the MOE calculation, as each subrecipient, not the MDE - OCTE, has control over the amount spent, if any, on CTE.

- **Michigan Department of Corrections (MDOC)**

After reviewing the CTE expenditures by the MDOC, the MDE - OCTE determined to exclude these funds from the methodology as unreliable. The DOC has the authority to determine the amount of its appropriation that shall be spent on CTE from year

to year. This amount fluctuates on a yearly basis. Therefore, the MDE - OCTE cannot ensure that expenditures meet the definition of CTE in the statute.

- **State School Aid Appropriations (other than section 61a(2) funds)**

With the exception of the funds appropriated under section 61a(2), the MDE – OCTE has determined to exclude all other State School Aid appropriations as the language of the appropriations does not require the recipients to expend the funds on CTE. Accordingly, the MDE – OCTE cannot reliably determine if the expenditures meet the definition of CTE found in the statute.

- **Pre-College Engineering**

Pre-College Engineering funds are part of the State School Aid appropriations (section 65). As noted above, the language of the appropriation does not require the recipients to expend the funds on CTE. Accordingly, the MDE – OCTE cannot reliably determine if the expenditures meet the definition of CTE found in the statute.

- **Michigan Department of Human Services (MDHHS)**

The MDE - OCTE provides federal Perkins funds to the DHHS for an education program for adjudicated youth. The MDE - OCTE has determined to exclude any state funds expended in this cost category because the MDE - OCTE cannot rely on the funds being spent from year-to-year. Furthermore, the CTE courses offered through the program are not state-approved CTE courses as described in Michigan's State Plan for CTE, and therefore, the MDE - OCTE cannot reliably determine if the expenditures meet the definition of CTE found in the statute.

DOCUMENTATION

The MDE - OCTE collects and maintains the necessary data documentation from SIGMA financial data portal and from the appropriate state agencies and department units.

The MDE - OCTE will review other potential categories of expenses that should be included in the MOE calculation and will generate notes as to why, if at all, the MOE methodology should be amended to include an additional cost category, subject to OCTAE's approval.

The MDE - OCTE generates and maintains the final calculations used in determining whether the MOE requirement is met.

All documentation will be collected by the MDE - OCTE and entered into a hard file maintained by the MDE - OCTE for a minimum of five years.

The MDE - OCTE will also maintain an electronic folder of electronic versions of the documentation, as well as any documentation too large to be maintained in the hard file, which will be maintained by the MDE - OCTE for a minimum of five years.

D. Accountability for Results

- 1. Identify and include at least one (1) of the following indicators of career and technical education program quality—**
 - a. the percentage of CTE concentrators (see Text Box 6 for the statutory definition of a CTE concentrator under section 3(12) of Perkins V) graduating from high school having attained a recognized postsecondary credential;**
 - b. the percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or**
 - c. the percentage of CTE concentrators graduating from high school having participated in work-based learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)**

Include any other measure(s) of student success in career and technical education that are statewide, valid, and reliable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins V) Please note that inclusion of “other” program quality measure(s) is optional for States.

Michigan has selected “the percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential” as the secondary indicator of career and technical education program quality.

Provide the eligible agency’s measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

For the chosen secondary quality indicator “recognized postsecondary credential”, the numerator is the number of CTE concentrators who graduated from high school having attained a recognized postsecondary credential. The denominator is the number of CTE concentrators who graduated from high school. Michigan is working with secondary, postsecondary, and employer partners through the Career Readiness Cross-Sector Team to develop a process for defining credentials that count for Perkins V reporting. The process includes an employer survey and a rubric to identify postsecondary credentials of value and in-demand programs. Identifying industry credentials of value to employers will take time, and therefore, the number of credentials approved for reporting will increase throughout the life of Perkins V.

- 2. Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined levels of performance or each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the State. (Section 113(b)(3)(A)(i)(I) of Perkins V)**

Form completed in Section V.B.

- 3. Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—**
- a. an explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8; and**
 - b. a description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).**
 - c. a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance (see Text Box 7 for the statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V)**

The levels of performance were developed in consultation with stakeholders through two subcommittees—one to address secondary accountability and one to address postsecondary accountability work, an executive committee, and statewide meetings with secondary and postsecondary CTE administrators. See section A.1 of this State Plan for a description of all stakeholders who were members of these committees.

The secondary accountability subcommittee was composed of 50 secondary and postsecondary education representatives, including postsecondary institutional research staff, secondary regional CTE administrators from intermediate school districts and local education agencies, and state staff responsible for ESSA accountability, WIOA reporting, postsecondary Perkins, secondary CTE and CEPI.

The secondary subcommittee assisted in 1) defining a “course” for determining secondary Perkins V concentrators, 2) selecting a secondary indicator of program quality, and 3) reviewing and commenting on proposed secondary state determined levels of performance (SDLPs) and baselines. The subcommittee met five times prior to public comment and will continue to meet to discuss Perkins measurements and reporting issues throughout Perkins V. During each subcommittee meeting, information was shared, the subcommittee broke into small groups and brainstormed solutions, identified strengths and challenges of the options, and then came together and discussed as a full group and then voted on a preferred solution. The subcommittee voted twice on which indicator of program quality to adopt with recognized postsecondary credential receiving sixteen of twenty and twenty of twenty-five votes respectively. During the fifth meeting the subcommittee reviewed proposed indicator baselines and targets based on data simulations and commented. OCTE took the comments into consideration in revising the measurement definitions and targets. In addition, the definitions, baseline data, and SDLPs were also presented to the Perkins V Executive Committee at least twice and also presented to secondary CTE administrators at statewide meetings and webinars at least three times. During a March 2019 statewide administrator meeting, questions and comments were collected on note cards. Out of a total of twenty-eight questions and comments, thirteen were questions. Ten questions or comments were related to the definition of a course, fifteen were related to the program quality indicator, one was about the SDLP, and the rest were about the local needs assessment and follow up survey. The questions and comments were shared with the secondary accountability subcommittee and taken into account when setting the SDLPs and selecting the

indicator of program quality. The questions were answered during later presentations and webinars. Example questions and comments included:

1. Even if postsecondary credential isn't chosen, I think we still need a suggested/recommended list of certifications/credentials for each CIP code if we are going to continue to aim toward stackable credentials that are meaningful.
2. We need a state-approved list of CTE industry certifications.
3. A list of certifications should be developed by the State of Michigan with input from the field. (suggested or recommended, not mandated).
4. I struggle with the rationale that secondary CTE should be measured by postsecondary achievement. I liken it to measuring the success of a baccalaureate program by how many earn a Ph.D. in the same timeframe.
5. 18-year-old requirement: if the denominator can change, can it be based on those that can earn the certificate? (ex.: If a student is not 18 prior to graduation, can they be excluded?)
6. A concern is that the credential ends up taking over the curriculum (i.e., CAN prep becomes the focus). This has potential to saturate a local market, causing frustrations with parents and students when the "competency" does not lead to employment.
7. Most apprenticeship programs require students to be 18 or older with diploma/GED. Will there be a list of programs willing to accept students? (Individuals without diploma and under 18.)
8. Accountability – No more Technical Skills Assessments but if we go to credentials, it's money to credentialing companies. Do we even know those credentials will be industry-recognized?
9. How does the per student cost of industry credential compare to the cost of the old TSAs? If it's more, is there funding attached to cover the increase?
10. We should look at what other states use for certifications when creating our list.

Many of the questions and comments focused on the need for a list of credentials. This need is being addressed through a competitive grant designed to identify credentials (see section C.2.a).

The Perkins V Executive Committee reviewed the recommendation of the Secondary Accountability Subcommittee to utilize recognized postsecondary credential as the indicator of secondary program quality. They generated a list of strengths and weaknesses which was shared with the accountability subcommittee the following month.

In general, the strengths identified focused on how recognized postsecondary credential aligned with the governor's goal for 60 percent of Michigan residents to have postsecondary credentials by 2030 and the value of a credential to students and employers. Weaknesses identified focused on that many secondary CTE programs currently do not provide students with the opportunity to earn a credential, and that it will be difficult for some students to attain a credential during high school. These concerns will be addressed several ways. The Career Pathways Grant (see section C.2.a) will provide programs with a list of credentials align with Michigan secondary CTE program standards which will assist teachers who may have been unaware of these opportunities for their students. Additionally, programs and teachers will be provided with professional development and tools so that programs will lead to credentials. Finally, options will be investigated for identifying, with employers, state-recognized credentials for programs where credentials are not currently available or recognized by employers.

The Postsecondary Accountability Subcommittee composed of representatives from the LEO – WD, MDE – OCTE, postsecondary CTE providers, Michigan Community College Data and Evaluation Committee (MCCDEC), Michigan Occupational Deans Administrative Council (MODAC), and Center for Educational Performance and Information (CEPI). The simulated data, methodology, and proposed targets for each of the core indicators of performance were shared with the Postsecondary Accountability Subcommittee for validation. The subcommittee advised on the development of the postsecondary state determined levels of performance. The Postsecondary Accountability Subcommittee also advised the committee members on measurement definitions for the core indicators of performance and the State determined levels of performance for each indicator.

Public comment on the State determined levels of performance was gathered through a public survey through five questions:

1. Please provide comments next to the appropriate section below explaining what you support, do not support, and what revisions you recommend:
 - Accountability for results (general comments);
 - How the levels of performance meet the requirements of the law;
 - How the levels of performance support the improvement of performance of all CTE concentrators, including subgroups of students and special populations;
 - How the levels of performance support the needs of the local education and business community; and
 - State Determined Levels of Performance

The survey, posted with a copy of the State Plan, was available both online or downloadable for mail return, for 60 days.

Public comment was also gathered during five virtual and in-person public hearings held in five different quadrants of the state utilizing local hosts and distance technology to provide access to the largest number of individuals. The purpose of the hearings was to provide all required stakeholder groups, the public, interested organizations and other groups the opportunity to provide feedback and make recommendations on the State Determined Levels of Performance (SDLPs) and baselines. The proposed SDLPs and baseline data were made available on the Michigan Perkins V website, distributed as an email attachment, and mailed upon request. (see section A.3 for hearing dates and locations and how public comment opportunities were publicized).

b. An explanation for the State Determined Levels of Performance that meet each of the statutory requirements in Text Box 8

The MDE - OCTE proposed the SDLPs are based on the preliminary data and trends analysis of Perkins IV core performance indicator data from prior years. Michigan CTE concentrators have consistently had graduation rates above 95 percent. Similarly, Michigan CTE completers also have consistently had placement rates above 95 percent. Therefore, the proposed SDLPs for graduation rate and placement rate are set at 95 percent for all four years in order to focus effort on improving the other performance indicators. The other proposed SDLPs started roughly equal to or higher than the simulated baseline data and included a proposed increase for each year covered by the State Plan. Michigan's Perkins IV performance was also compared to that of other states. The representatives from each of the twenty-seven

secondary regions were invited to review local, regional, and statewide performance indicator preliminary data during a webinar and provide input on the SDLPs.

The SDLPs for postsecondary were determined by applying the definitions for the Perkins V core indicators of performance to historical data collected and reported under Perkins IV. Simulated Perkins V data from 2014 – 2018 was created for each core indicator of performance to be utilized as the baseline for 2020 performance.

The simulated data was averaged across the four-year period to adjust for anomalies in the data, and to identify realistic performance targets. Due to new or refined definitions under Perkins V, efforts to align the data to WIOA data, and historical data inconsistencies, the SDLPs were set at ninety percent (90 percent) of the average simulated outcomes for Program Year 2020. The state will increase the target percentage in each of the following three program years to meet continuous improvement goals.

c. A description of how the State Determined Levels of Performance set by the eligible agency align with the levels, goals, and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

Michigan's challenging goal of identifying credentials of value for secondary CTE programs and our indicator baselines align with Michigan's Top 10 Strategic Education Plan goals. In particular, the SDLPs align with goals 4. Expand secondary learning opportunities for all students 5. Increase the percentage of all students who graduate from high school and 6. Increase the percentage of adults with a postsecondary credential. The table below shows how Michigan's Perkins indicators align with Michigan's ESSA indicators.

Perkins CPI	Perkins Proposed SDLP	ESSA Components	Michigan ESSA Target
1S1 – Four-Year Graduation Rate (Perkins IV: 4S1)	95.00%	ESSA 1: Four Year Graduation Rate	87.93%
2S1 – Academic Proficiency in Reading Language Arts (Perkins IV: 1S1)	58.00%	ESSA 2: Proficiency - 11 th grade proficiency on the M-Step, SAT, and MI-Access ELA test	55.17%
2S2 – Academic Proficiency in Mathematics (Perkins IV: 1S2)	34.00%	ESSA 3: Proficiency - 11 th grade proficiency on the M-Step, SAT, and MI-Access Math test	43.11%
2S3 – Academic Proficiency in Science (Perkins IV: N/A)	N/A	ESSA 4: Data will be available 2020	N/A
3S1 – Post-Program Placement (Perkins IV: 5S1)	82.00%	ESSA 5: No Component	N/A
4S1 – Nontraditional Program Concentration (Perkins IV: 6S1 and 6S2)	19.00%	ESSA 6: No Component	N/A
5S1 – Program Quality-Attained Recognized Postsecondary Credential (Perkins IV: 2S1)	3.00%	ESSA 7: School Quality, as some elements of School Quality align (i.e. Postsecondary alignment) advanced coursework includes CTE completers	N/A

The proposed SDLPs for graduation rate and reading proficiency (95 percent and 58 percent respectively) exceed Michigan's targets for ESSA (87.93% and 55.17%, respectively). The proposed SDLPs for math are 34%, compared to 43.11% for ESSA based on actual data on CTE student performance in math. Historically CTE students have performed slightly lower on the 11th grade math test in Michigan, compared to all students. The SDLP of 3% was set based on the MDE – OCTE's best estimate of the baseline for Recognized Postsecondary Credential based on limited available data (see below for description of process used to establish a baseline).

The secondary Perkins SDLP for recognized postsecondary credential for 2020-2021 is considerably lower than Michigan's program year 2018 target for credential attainment rate for WIOA Youth of 75.3 percent. However, the WIOA credential attainment indicator includes attainment of a high school diploma or equivalent for students who are employed or enrolled in postsecondary education, while the Perkins secondary indicator of program quality does not. Since the state baseline for high school graduation rate is almost 97%, the indicator baseline and target would be considerably higher if the Perkins indicator measure was comparable to the WIOA youth measure.

Although the postsecondary core indicators of performance under Perkins V closely align with those measured under Perkins IV, the SDLPs for PY 2020 – 2023 are significantly different than the target levels under Perkins IV. This is due to a change in data collection methodology. Previously, the state measured student placement (Perkins IV, 4P1) for CTE concentrators based on responses to locally developed surveys. Survey response rates had a significant impact on the measure. Under Perkins V, the state will measure postsecondary retention and placement (Perkins V, 1P1) of all CTE concentrators, regardless of their response to the locally developed surveys. This methodology will more closely align with WIOA reporting. The state will explore additional methods for identifying positive placement outcomes for CTE concentrators. The state will continue to work with representatives from the community colleges through MCCDEC to evaluate the methodologies used to calculate the SDLPs.

As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

The MDE - OCTE calculated the baseline for graduation rate, academic proficiency (Reading and Math), post-program placement, and nontraditional concentration using the average actual performance of the two most recently completed program years. For the new program quality indicator, credential attainment, the MDE - OCTE calculated the baseline value based on currently available data including information from the Michigan Student Transcript and Academic Record Repository Collection (STARR), and technical skill assessment data (Perkins IV 2S1 core performance indicator) for a subset of programs that utilized credentials for Perkins IV reporting.

Because the available technical skill assessment data required considerable cleaning to extract credentials from other technical skills assessments, the MDE - OCTE worked with deidentified student data cleaned by researcher partners to compute the baseline for this indicator. For Science academic proficiency, Michigan requested and was approved for a waiver to submit baseline and SDLPs by April 2021, due to lack of data because of a new assessment.

The MDE – OCTE conducted local level negotiations with CTE secondary subrecipients from twenty-seven regions to determine the local performance levels. The region level Perkins V baseline data was used to propose the local performance levels for each CTE secondary subrecipient. Each region was asked to accept the SDLPs or request to negotiate levels for each core indicator of all four years covered by the state plan. The negotiated local performance levels took into consideration the SDLPs for each core indicator to ensure that the state determined performance levels can be met. Regions that did not accept the state determined performance levels were required to submit a written request to negotiate their local performance levels. The request includes: 1) proposed local performance levels; 2) justification and objective data for each proposed local level; and 3) detailed plan to raise agency performance levels to or above state adjusted levels.

The LEO-WD estimated the baseline for post-program placement (1P1), earned recognized postsecondary credential (2P1), and non-traditional program concentration (3P1) using the average simulated performance of the four most recently completed program years. The LEO-WD applied Perkins V definitions to actual performance data from 2014 – 2018 for each of the thirty-two postsecondary CTE providers. The median value for each measure, each year was

averaged across the four-year period to identify the estimated baselines. The LEO-WD provided post-secondary CTE providers an opportunity to provide feedback on their individual institution's baseline data using locally available, student-level data prior to the submission of the State Plan.

The LEO - WD will conduct local level negotiations with postsecondary CTE providers to determine adjusted performance levels. The same Perkins V simulated data from 2014 – 2018 has been used to identify target performance levels for each CTE provider. Provider level targets also take into consideration the SDLPs for each core indicator to ensure that the state determined level of performance are met. Eligible recipients that do not accept their adjusted performance levels may submit a written request to negotiate their adjusted performance levels. The request must include: 1) proposed adjusted performance levels; 2) justification (including objective supporting data) for each proposed adjusted level; and 3) a detailed plan and timeline for the agency to reach the state proposed target(s). Agencies will be allowed to revise their adjusted performance levels if the make-up of the local recipient changes in terms of number of students, programs, or buildings (programs or buildings open or close), or there was a change in factors outside the control of the local recipient.

4. Provide a written response to the comments regarding State Determined Levels of Performance received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V).

Section V: State Determined Levels of Performance

Respondent #3: "I was a little confused as to how the performance levels were determined. There seemed to be not expectation of increased performance in the future."

State Response: State SDLPs were established based on limited available information so projected growth in performance was initially conservative. The state may revise the SDLPs after the first two years if the state is not under an improvement plan. Therefore, once actual performance data are available the state may choose to increase the SDLPs.

Section D: Accountability for Results

Respondent #5: "LEO-WDA process for "simulated data" for Perkins V CPIs, and establishing targets, especially for 1P1 is incredibly flawed. The "simulated data" for 1p1 was based on local alumni survey results, and as stated by LEO-WDA non respondents to the survey were held against the school for outcomes (and also the reason the target is so incredibly low). However, on page 59 it is stated that "survey response rates had a significant impact on the measure. Under Perkins V, the state will measure postsecondary retention and placement (Perkins V, 1p1) of all CTE concentrators, regardless of their response to the locally developed surveys. This methodology will more closely align with WIOA reporting. The state will explore additional methods for identifying positive placement outcomes for CTE concentrators." Absolutely no detail on what this "measure" regardless of response to locally developed surveys is provided, nor the potential "additional methods for identifying positive placement outcomes." And, if these actually have been identified by LEOWDA, why were they not used for the "simulated data" for 1p1 and establishing targets instead of the responses to locally developed surveys?

Section D1: How the levels of performance meet the requirements of the law:

Respondent #5: "Significant flaws in LEO-WD estimated baseline and targets for 1p1. Where is the documentation that the Postsecondary Accountability Subcommittee had opportunity to truly provide feedback on simulated data, methodology and proposed CPIs, and advised for those definitions--relative to all of them, but especially 1P1? I was at meetings that these were

presented/discussed (not PAS meeting), and there were considerable concerns and questions raised by those Perkins involved staff to these proposed methods. LEO-WDA staff were frustrated with the questions and concerns and essentially said this was the way they decided to do it."

Section V: State Determined Levels of Performance:

Respondent #5: "Methodology and "simulated data" used for postsecondary is problematic, especially for 1p1."

State Response to Respondent #5 regarding accountability comments: The state acknowledges that the existing data utilized for the simulation were not reliable. Based upon aggregated data the state worked to develop the most accurate simulation possible according to legislative requirements. This will continue to evolve as disaggregated data are collected moving forward.

Section D: Accountability for Results

Respondent #6: "As representatives of postsecondary education institutions we ask that the state include its commitment to the following in the State plan: • Continuing efforts and work to ensure that postsecondary providers have access to the level of employment outcome data needed to identify specific program improvement needs, i.e., student record level data. • Consistent and timely updates on and resources to ensure postsecondary providers are advised of what constitutes career technical education by CIP Code, and on what defines nontraditional programs by program, as well as identification of high demand/wage/skill programs by CIP code. • Continuing efforts to identify acceptable industry recognized credentials external to postsecondary institutions. • Continuing work to identify resources and methods to obtain data regarding student completion of industry recognized credentials external to postsecondary institutions. • Commitment to full staffing of departments/ units/agencies supporting, monitoring and evaluating postsecondary efforts to fulfill Perkins V requirements including succession planning to ensure continued expertise. As a group we are concerned about statements regarding alignment with WIOA data standards – it should be clear that alignment with these standards is not replication of these standards, rather complementary measures recognizing the differing governance structures and subsequent difference in allowable data collection and reporting. Finally, we note that in the accountability section regarding outcomes, local surveys are still allowed in the transition plan. However, nonrespondents to surveys are not included as a separate category, meaning that unknown outcomes are included as unsuccessful outcomes. This practice discourages efforts to develop methods to collect better data on this group. We suggest that the state add a category of nonrespondent to identify the scope of the issue to encourage investigation into methods to collect the better data."

State Response: Guidance to subrecipients related to CIP Codes, nontraditional programs by program, and identification of high demand/wage/skill programs by CIP Code will be provided as received from US DOE. Language related to the alignment with WIOA will be added to this section as necessary for clarification. The state agrees that institutions should strive to investigate methods that identify the scope of issues related to non-response.

5. As part of the written response, include a description of any the changes made to the State Determined Levels of Performance as a result of stakeholder feedback.

No changes were made or required to the state determined levels of performance as a result of stakeholder feedback.

6. Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V)

MDE - OCTE will analyze the secondary core performance indicators by race, gender, special populations subgroups and by Perkins grant region to identify disparities compared to all CTE concentrators in the state, and where possible, to all students (CTE and non-CTE) in the state. MDE - OCTE will analyze disparities, identify evidence-based improvement strategies and develop a plan to address the disparities. Strategies may include targeted statewide technical assistance workshops. Additionally, secondary Perkins grant regions which fail to meet one or more SDLPs will be required to complete a regional improvement plan addressing achievement gaps and actions to be taken to address the gaps which must be reflected in their Perkins annual application and use of Perkins funds. Regions that fail to make improvement will be provided with specialized technical assistance and may have mandated funding requirements associated with use of their Perkins funds.

If a postsecondary institution fails to meet at least ninety percent (90 percent) of an agreed upon State adjusted level of performance for any core indicator of performance, as described in section 113(b)(3)(C)(ii)(II) of Perkins V, the institution will develop and implement a program improvement plan (with special consideration to performance gaps identified). The plan will be developed in consultation with the appropriate agencies, individuals, and organizations during the first program year succeeding the program year for which the eligible agency failed to so meet the State adjusted level of performance for any of the core indicators of performance. Postsecondary institutions will be required to address the gaps in performance in the local annual grant application and the use of Perkins funds to develop activities to meet or exceed state adjusted performance levels.

LEO - WD will provide technical assistance to any postsecondary institution that fails to meet 90 percent of an agreed upon State adjusted level of performance in any core performance indicator, including monitoring visits and professional development opportunities.

As part of the written response, and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP),⁸ the eligible agency could indicate that it will analyze data on the core indicators of performance to identify gaps in performance, explain how they will use evidence-based research to develop a plan to provide support and technical assistance to eligible recipients to address and close such gaps, and how they will implement this plan. The eligible agency is not required to submit a new State plan prior to the third program year in order to address this requirement.

- **ASSURANCES, CERTIFICATIONS, AND OTHER FORMS**

- **Statutory Assurances**

X The eligible agency assures that:

- *It made the State plan publicly available for public comment⁹ for a period of not less than 30 days, by electronic means and in an easily accessible format, prior to submission to the Secretary for approval and such public comments were taken into account in the development of this State plan. (Section 122(a)(4) of Perkins V)*
- *It will use the funds to promote preparation for high-skill, high-wage, or in-demand industry sectors or occupations and non-traditional fields, as identified by the State. (Section 122(d)(13)(C) of Perkins V)*
- *It will provide local educational agencies, area career and technical education schools, and eligible institutions in the State with technical assistance, including technical assistance on how to close gaps in student participation and performance in career and technical education programs. (Section 122(d)(13)(E) of Perkins V)*
- *It will comply with the requirements of this Act and the provisions of the State plan, including the provision of a financial audit of funds received under this Act, which may be included as part of an audit of other Federal or State programs. (Section 122(d)(13)(A) of Perkins V)*

- *None of the funds expended under this Act will be used to acquire equipment (including computer software) in any instance in which such acquisition results in a direct financial benefit to any organization representing the interests of the acquiring entity or the employees of the acquiring entity, or any affiliate of such an organization. (Section 122(d)(13)(B) of Perkins V)*
- *It will use the funds provided under this Act to implement career and technical education programs and programs of study for individuals in State correctional institutions, including juvenile justice facilities. (Section 122 (d)(13)(D) of Perkins V)*

- **EDGAR Certifications**

- *By submitting a Perkins V State Plan, consistent with 34 CFR 76.104, the eligible agency certifies that:*
 - *It is eligible to submit the Perkins State plan.*
 - *It has authority under State law to perform the functions of the State under the Perkins program(s).*
 - *It legally may carry out each provision of the plan.*
 - *All provisions of the plan are consistent with State law.*
 - *A State officer, specified by title in Item C on the Cover Page, has authority under State law to receive, hold, and disburse Federal funds made available under the plan.*
 - *The State officer who submits the plan, specified by title in Item C on the Cover Page, has authority to submit the plan.*
 - *The entity has adopted or otherwise formally approved the plan.*
 - *The plan is the basis for State operation and administration of the Perkins program.*
- **Other Forms**
- *The eligible agency certifies and assures compliance with the following enclosed forms:*
 - *Assurances for Non-Construction Programs (SF 424B) Form (OMB Control No. 0348-0040) - <https://www2.ed.gov/fund/grant/apply/appforms/sf424b.pdf>*
 - *Disclosure of Lobbying Activities (SF LLL) (OMB Control No. 4040-0013): https://apply07.grants.gov/apply/forms/sample/SFLLL_1_2-V1.2.pdf*
 - *Certification Regarding Lobbying (ED 80-0013 Form): <https://www2.ed.gov/fund/grant/apply/appforms/ed80>*

- -013.pdf
General Education Provisions Act (GEPA) 427 Form (OMB Control No. 1894-0005):_
<https://www2.ed.gov/fund/grant/apply/appforms/gepa427.pdf>

ADDENDUM

Michigan State Plan For the Strengthening Career and Technical Education for the 21st Century Act (Perkins V)

II. NARRATIVE DESCRIPTIONS

D. Accountability for Results

3. Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—

- a. a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance (see Text Box 7 for the statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V).**

MDE - OCTE and LEO – WD made the proposed 2024-2028 State Determined Levels of Performance (SDLPs) available for public comment for 30 days to provide the public, all required stakeholders, interested organizations and groups (including teachers, faculty, specialized instructional support personnel, paraprofessionals, school leaders, authorized public chartering agencies and charter school leaders, employers, labor organizations, parents, students, Indian Tribes and Tribal organizations, and community organizations) the opportunity to comment on the proposed SDLPs. The proposed 2024-2028 SDLPs were made available on the Michigan Perkins V website, distributed as an email attachment, and mailed upon request. Public comment was gathered through a public comment tool available online or as a downloadable paper form for return by mail from September 13 through October 17, 2023. The public comment tool gathered input through five questions:

1. Please provide comments next to the appropriate section below explaining what you support, do not support, and what revisions you recommend:
 - Accountability for results (general comments);
 - How the levels of performance meet the requirements of the law;
 - How the levels of performance support the improvement of performance of all CTE concentrators, including subgroups of students and special populations;
 - How the levels of performance support the needs of the local education and business community; and
 - State Determined Levels of Performance

In addition, to ensure that stakeholders were engaged in review of the State plan and had input into whether any substantive changes were needed, Michigan again convened the State Plan Executive Committee, and the four subcommittees: High Quality CTE Programs of Study, Equity and Special Populations, Comprehensive Local Needs Assessment, and Accountability to review the state plan accomplishments and proposed SDLPs. Below is a summary of input gathered through these committees.

The Perkins State Plan Executive Committee membership list was updated to include all required stakeholder groups and the committee met twice—on September 13, 2023, and

October 31, 2023. The September 13 meeting provided an overview of the Perkins V committee structure, Executive Committee purpose, and reports on accomplishments in the first three years of the Perkins state plan from the Accountability Subcommittees and Comprehensive Local Needs Assessment Subcommittee. Participants engaged with state staff through a series of stakeholder questions regarding stakeholder priorities for secondary and postsecondary CTE in Michigan. Proposed State Determined Levels of Performance (SDLPs) for 2024 through 2028 were shared with the Executive committee at the September 13 meeting. The October 31 meeting included reports from the Equity and Special Populations secondary and postsecondary subcommittees and the High Quality CTE Programs of Study subcommittees, as well as a summary of public comments on the proposed 2024-2028 SDLPs. Stakeholder feedback on stakeholder priorities related to high quality CTE programs of study and equity and special populations were gathered at the October 31 meeting. No substantive changes to the state plan were identified by the State Plan Executive Committee.

The High Quality CTE Programs of Study (HQCTEPOS) subcommittee met to review current accomplishments and provided feedback for moving forward with Perkins V. No substantive changes to the state plan were identified by the subcommittee. Members were provided with the Association of Career and Technical Education (ACTE) Quality CTE Program of Study Framework and were updated on the work of the PV State plan executive committee and subcommittees. The subcommittee reviewed the accomplishments within each component of the ACTE Quality CTE Program of Study Framework and provided feedback in gaps and recommendations for each of the twelve components, identifying gaps and recommendations for moving forward. The subcommittee reviewed the Career Pathways Project and the completed programs with competencies developed, programs of study and identified credentials.

The Secondary and Postsecondary Equity and Special Populations Subcommittee membership list was updated to replace stakeholders who were no longer available. The Committee was convened in a virtual meeting on July 27, 2023. The subcommittee reviewed accomplishments of the first three years of the Michigan Perkins State Plan and provided input and comment on equity needs and needs of special populations in CTE. No substantive changes to the current state plan were identified by the subcommittee. Recommendations on how the State or Regions could further promote Career and Technical Education (CTE) Programs of Study and engage with students in Special Populations were solicited from the State Plan Executive committee and included student engagement, professional development, hiring of staff and working with organizations in the community to promote and advertise CTE for students in special populations. Student engagement should focus on ensuring that students have equitable opportunities to work-based learning and career exploration. Students should have access to the tools that they need to be successful in CTE programs such as ensuring that information is presented to students and their families in their home language, exposure to CTE in early grades such as elementary and middle school, and access to counselors who will guide and facilitate them through the CTE program such as making connections between students with an IEP and the special education staff and CTE staff so that the students have the supports that they need. There is a shortage of staff in all areas: mentors, paraprofessionals, and other staff who are needed to support students. Professional development of staff is also a key component in ensuring that students are successful. Both secondary and postsecondary staff should have a combined professional development so that there is a common understanding of language, collaboration, career pathway programs and other shared goals. Engagement with the community is also a key component that

is needed to assist students ((i.e., women, infants and children, homeless shelters, social security office, etc.) and providing presentations and resources on career and technical education (CTE) programs of study for an interdisciplinary approach. Several recommendations were given on how to utilize special populations recruitment funds such as conducting a marketing campaign that highlights participants of special populations, advertising on social media sites and in different modalities: text, postcards, social media postings and printing resources to distribute to organizations that serve students (i.e., Women, Infants and Children, homeless shelters, social security office, etc.).

The Comprehensive Local Needs Assessment Subcommittee (CLNA) met on February 7, 2023, February 28, 2023, and April 13, 2023. The committee reviewed the current questions and format of the CLNA and made recommendations for improvement of the online CLNA which were implemented prior to release of the current online CLNA for question clarity and ease of use.

The Secondary Accountability Subcommittee met on June 6, 2023, and reviewed the accomplishments of the first three years of the state plan, along with the baselines and proposed state determined levels of performance for 2024-2028. The committee recommended the SDLPs as proposed by OCTE without revisions. No substantive changes to the current state plan were identified by the subcommittee. The recommendations of the Secondary accountability subcommittee were shared with the Perkins V State Plan Executive Committee on September 13, 2023.

MDE-OCTE and LEO-WD also consulted with the Confederation of Michigan Tribal Education Departments (CMTED) twice regarding the proposed 2024-2028 Perkins V State Determined Levels of Performance. On July 11, 2023, MDE-OCTE and LEO-WD presented the progress to date in implementing the Perkins V state plan, the accomplishments of the first three years of the state plan and planned public comment period. On October 10, 2023, MDE-OCTE and LEO-WD presented the proposed 2024-2028 SDLPs and solicited input and questions from CMTED.

Progress in implementing the Michigan State Plan for Perkins, accomplishments over the first three years of the plan, and the proposed State Determined Levels of Performance (SDLPs) were also shared at the following events:

Perkins V State Plan Stakeholder Engagement

Date	Group	Content shared
May 10, 2023	Career Education Planning District (CEPD) Council	Process to review and update the Perkins State plan and set SDLPs for 2024-28 has begun. Will be setting baseline and SDLPs for 2S3-Science for first time. Reconvening state plan executive committee and subcommittees. Shared planned public comment period.
June 15, 2023	Michigan Occupational Deans Advisory Council	Process to review and update the Perkins State plan and set SDLPs for 2024-28

Date	Group	Content shared
	(MODAC)	has begun. Shared planned public comment period.
June 15, 2023	Michigan Community College Data & Evaluation Committee (MCCDEC)	Process to review and update the Perkins State plan and set SDLPs for 2024-28 has begun. Shared postsecondary SDLPs
June 6, 2023	Perkins V Secondary Accountability Subcommittee	Accomplishments under 2020-24 PV State Plan. Solicit input on proposed secondary SDLPs. Shared planned public comment period.
July 11, 2023	Confederation of Michigan Tribal Education Departments	Accomplishments under 2020-24 PV State Plan. Solicit questions. Shared planned public comment period.
July 27, 2023	Equity and Special Populations Subcommittee Virtual meeting	Accomplishments under 2020-24 PV State Plan. Solicit input
August 3, 2023	CTE Summer Conference	Accomplishments under 2020-24 PV State Plan. Shared (updated) planned public comment period. Shared proposed secondary and postsecondary SDLPs Solicited questions and comments.
August 23, 2023	Email to MODAC/MCCDEC/Perkins Postsecondary Contacts	Accomplishments under 2020-24 PV State Plan. Shared (updated) planned public comment period. Shared proposed secondary and postsecondary SDLPs Solicited questions and comments.
September 12, 2023	Michigan State Board of Education	Shared planned public comment period. Shared proposed secondary and postsecondary SDLPs
September 13, 2023	Perkins V Executive Committee	Accomplishments under 2020-24 PV State Plan. Shared (updated) planned public comment period. Shared proposed secondary and postsecondary SDLPs Solicited questions and comments.
October 10, 2023	Confederation of Michigan Tribal Education Departments (CMTED)	Updated CMTED on state plan public comment period and proposed SDLPs and solicited input and comments.
October 25, 2023	OCTE Fall Update presentation	Accomplishments under 2020-24 PV State Plan.

Date	Group	Content shared
		Shared (updated) planned public comment period. Shared proposed secondary and postsecondary SDLPs Solicited questions and comments.
October 31, 2023	Perkins V Executive Committee	Accomplishments related to High Quality CTE programs of study and Equity and Special populations under 2020-24 PV State Plan. Solicited input on priorities. Shared summary of public comment on proposed SDLPs.
January 9, 2024	Michigan State Board of Education	Presented proposed SDLPs, public comments and responses.

b. an explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8: (III) REQUIREMENTS.—Such State determined levels of performance shall, at a minimum—

(aa) be expressed in a percentage or numerical form, so as to be objective, quantifiable, and measurable;

State determined levels of performance are expressed in a percentage form and are objective, quantifiable, and measurable. See data table with SDLPs.

(bb) require the State to continually make meaningful progress toward improving the performance of all career and technical education students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48);

All SDLPs increase annually.

To meet the state plan deadlines the Office of Career and Technical Education needed to begin calculations for the new secondary SDLPs in Spring 2023 before final 2022-23 data were available for all indicators. Therefore, the baselines were calculated on the prior two years of available data as follows: 1S1 baseline was calculated on the average of 2020-21 and 2021-22 = 95.36%; 2S1 and 2S2 were calculated on the most recent two years of data--2019-20 and 2021-22 since the 11th grade assessments were not administered in Spring 2020 resulting in no data for 2020-21 graduates. The average for 2S1 was 54.83% and for 2S2 was 33.12%. The only data available to calculate a baseline for 2S3 was pilot test data for 2021-22=13.26%. The baseline for 3S1 was based on the average of 2020-21 and 2021-22=94.33%. The baseline for 4S1 was based on the average of 2020-21 and 2021-22=27.36%. The baseline for 5S1 was based on the average of 2021-22 and 2022-23 preliminary data=8.32%. The proposed SDLPs for graduation rate were set starting with baseline data and increase 0.1% each year to comply with US Department of Education requirement to show continuous improvement. Since the baseline for this indicator is above 95%, the annual increase of .1% is appropriate. The SDLPs for math and reading proficiency start at baseline and increase by

0.1% each year. The minimum increase was used for these indicators because there was no consistent pattern of increase in reading and math proficiency over the past 3 years of Perkins V or in Perkins IV in Michigan. The SDLPs for Science proficiency (2S3) were based on the Science pilot test performance data for CTE Concentrators and on the observed change over time for all students (CTE and Non-CTE). The initial SDLP for 2S3 was set consistent with the CTE Concentrators' pilot test percentage but increases by 2% per year based on the observed improvement from 2020-21 to 2021-22 for all students—CTE and Non-CTE. Due to the COVID19 pandemic it was anticipated that employment and postsecondary enrollment would decrease in 2020-21. Therefore, Michigan proposed and held public comment, to reduce the SDLP for secondary post-program placement for 2020-21 and 2021-22. The actual placement rate did decline in 2020-21 but not as much as anticipated and returned to nearly pre-pandemic levels by 2021-22. Therefore, SDLPs for the secondary post-program placement rate were set based on historical performance. The proposed SDLPs start at 0.1% higher than the 2023-24 SDLP and increase by 0.1% every year since the SDLP starts high. The SDLP for nontraditional concentration (4S1) in 2024-25 was based on the average of the most recent 2 years' performance (27.4%) and the proposed increase is 0.25% each year. The proposed increase was based on an observed average increase of 0.7% from 2019-20 to 21-22 ignoring the pandemic year. The observed average increase in the Perkins IV nontraditional participation (6S1) indicator over past 7 years was about 0.3%. The proposed 5S1 Recognized Postsecondary Credential 2024-25 SDLP was based on the average of the most recent 2 years' performance data. The proposed increase of 2% per year was based on a calculation of the expected increase in number of CIP Codes that will have approved credentials over the next four years, and the number of concentrators in those CIP Codes.

Aggregate data is collected at the postsecondary level. Through analysis of the last few years of aggregate data, it was determined that continuing with a conservative approach was appropriate. Postsecondary also has a goal of collecting both disaggregated data and wage record match with the adoption of an improved data collection system within the next four years. For 1P1, statewide outcomes for the past three years were averaged with 125%, 150%, 175%, and 200% of our SDLP years 1, 2, 3 & 4 of Perkins V respectively. Postsecondary expects to see a substantial jump in employment outcomes with the collection of disaggregated data and wage record match. For 2P1, statewide outcomes for the past three years were averaged with 90% of our SDLPs in years 1-4 of Perkins V. Postsecondary expects this outcome will also be more stable after moving to a new data collection system. Finally, for 3P1, statewide outcomes for the past three years were averaged with our SDLPs in years 1-4 of Perkins V. Postsecondary does not anticipate a substantial change in this outcome with system changes.

The proposed SDLP targets for all three measures are based on making continuous upward progress over the 4-year performance period, starting minimally from historical baseline performance achievement averages of 90%. Starting with PY24, LEO-Workforce Development is planning to collect participant level (as opposed to aggregate) postsecondary CTE student data from the 32 participating Perkins institutions. This plan involves collaboration with the Center of Educational Performance and Information (CEPI). Impact on reported performance levels based on participant level data is unknown and may result in upward or downward bias. Risk associated with the implementation of a new data reporting process, and related data validation, has been incorporated into the proposed SDLP targets. The proposed performance projections presented are more likely

achievable with opportunities to exceed.

(cc) have been subject to the public comment process described in subparagraph (B), and the eligible agency has provided a written response;

Public comments submitted in writing through the public comment tool include the following, along with the state response to each comment. No changes were needed to the State determined levels of performance as a result of stakeholder feedback:

Respondent #1

Comments submitted on behalf of: As an Individual

Stakeholder Group: Individuals with Disabilities

County: Montcalm

Support the Plan: Yes

COMMENTS: [None]

RESPONSE: none required

Respondent #2

Comments submitted on behalf of: As an Individual

Stakeholder Group: Representatives of Secondary CTE Programs

County: Dickinson

Support the Plan: Support the plan with minor revisions.

COMMENTS:

Section D1: The structure will meet the requirements with adjustments to the performance levels.

Section D2: The performance levels are unrealistic due to the loss of learning during the pandemic. The testing scores have consistently dropped since the pandemic as the effect of the shutdowns and forced online learning are seen. This is especially noticed with the students in 5-9th grades at the time with a noticeable loss in foundational skills in math and reading proficiency.

Section D3: It would be a shame for funding for these programs that support local businesses to lose funding because of unrealistic expectations for the performance levels. With the listed performance levels, this does NOT support the local education and business community.

Section IV: As stated above the performance levels of math and reading proficiency were dropping before the pandemic, so increasing the percentage based on testing immediately after the pandemic does not capture the loss of learning we are experiencing in the schools, especially rural and economically disadvantaged areas that did not have access to the internet.

RESPONSE: U.S. Department of Education (USDOE) required states to set State Determined Levels of Performance (SDLPs) no lower than the average of the most recent two years of performance. For Core Performance Indicators (CPI) 2S1 (11th grade Reading Academic Attainment) and 2S2 (11th Grade Math Academic Attainment) data were available for 2018-2019 (reported for CTE Concentrators who left school in 2019-20) and 2020-2021 (reported for CTE Concentrators who left school in 2021-22). As such, the learning loss resulting from the pandemic is reflected in the starting SDLP. For CPI 2S3 (11th Grade Science Academic Attainment) only the pilot test year were available. The SDLPs for secondary CTE for Reading and Math were set starting at the USDOE minimum requirement and increase the required minimum of .1% per year. The SDLP for Science increases 2% per year based on the observed increase for all students

following the pilot year (though 2022-23 year data were not available for CTE Concentrators at the time the SDLPs were set).

Respondent #3

Comments submitted on behalf of: On behalf of a group or organization

Stakeholder Group: Representatives of Secondary CTE Programs

County: Genesee

Support the Plan: Yes

COMMENTS: [None]

RESPONSE: none required

Respondent #4

Comments submitted on behalf of: As an Individual

Stakeholder Group: Parents

County: Dickinson

Support the Plan: Support the plan with minor revisions

COMMENTS:

Section D3: Post secondary credentials are not valued by the local business community

Section IV: Since there is no state Science test and the pilot scores were done during covid, the baseline level is too high.

RESPONSE:

To Section D3: Industry credentials are being reviewed and approved through the Career Pathways Grant (CPG) project--a collaborative grant opportunity to fund secondary/postsecondary and employer partnerships to develop seamless programs of study aligned to local labor market needs and student interests; with learner-friendly on-ramps and off-ramps, that culminate in postsecondary recognized credentials and provide an opportunity for credit at the postsecondary level. Grant recipients work with and survey Michigan employers to identify the competencies and credentials valued by employers and link credentials to state Career and Technical Education (CTE) program standards and ensure aligned, high quality CTE programs of study. This process ensures that the credentials approved for Perkins reporting are identified with industry and/or employer input. In addition, postsecondary awards (Associate Degrees), certificates of completion of a registered apprenticeship, and state and national licenses are included in the measure of recognized postsecondary credentials.

To Section IV: U.S. Department of Education (USDOE) required states to set State Determined Levels of Performance (SDLPs) no lower than the average of the most recent two years of performance. The 2S3-Science SDLP was set based upon the only available data, which was the pilot year data. Review of the performance of all students in the first non-pilot year of the new science test compared to the pilot test performance showed that performance more than doubled for all students between the pilot test year and the first non-pilot test year (from 15.5% to 38.0%). Therefore, assuming that performance for CTE Concentrators will follow a similar pattern, the SDLP for Science was set to increase 2% per year, starting at .04% above the observed performance on the pilot test of 13.26%. This was deemed sufficiently conservative given the lack of non-pilot test data upon which to base the SDLP.

Respondent #5

Comments submitted on behalf of: As an Individual

Stakeholder Group: Parents

County: Clare

Support the Plan: Yes

COMMENTS: [None]

RESPONSE: none required

Respondent #6

Comments submitted on behalf of: As an Individual

Stakeholder Group: Representatives of Secondary CTE Programs

County:

Support the Plan: Yes

COMMENTS: [None]

RESPONSE: none required

Respondent #7

Comments submitted on behalf of: As an Individual

Stakeholder Group: Parents

County: Lenawee

Support the Plan: Support with minor revisions

COMMENTS:

Section D2: Barely any mention of disability or special education

Section D3: These goals are astonishingly low. So by 2025 you want 15.3% of kids to be proficient in science. So that the means the other 84.7% of students are not proficient? How is that OK? Same comments for math targets.

Section IV: You're able to meet the goals because you have such a low aim. So many students are just left behind.

RESPONSE:

To Section D2: The Michigan Department of Education and Michigan Department of Labor and Economic Opportunity publish Perkins Core Performance Indicator (CPI) performance by race, gender and special population categories in report and dashboard form. Secondary performance can be found at analytics.cteis.com. Postsecondary performance can be found at <https://www.michigancc.net/CCData/CorePerformanceIndicators/default.aspx>. Additionally, Perkins subrecipients are required to analyze their performance data by race, gender and special population category as part of the semiannual Comprehensive Local Needs Assessment (CLNA) and identify strategies for improvement in the annual subrecipient Perkins application for funding and in the Local or Regional Improvement Plan if the subrecipient fails to meet 90% of the overall SDLP.

To Section D3 & IV: The State Determined Levels of Performance (SDLPs) were set based upon historical performance of CTE Concentrators with an expectation that performance must increase annually. Under the Perkins legislation, if a state fails to meet 90% of an SDLP it will be prohibited from adjusting the SDLP while under an improvement plan making it important not to set the SDLPs at unattainable levels. For Core Performance Indicators (CPI) 2S1 (11th grade Reading Academic Attainment) and 2S2 (11th Grade Math Academic Attainment) data were available for 2018-2019 (reported for CTE Concentrators who left school in 2019-20) and 2020-2021 (reported for CTE Concentrators who left school in 2021-22). The data partially reflect the learning loss resulting from the pandemic in the starting SDLP. For CPI 2S3 (11th Grade Science Academic Attainment) only the pilot test year were available. Because trend data were unreliable due to the pandemic, and to lack of data from the new science test, the SDLPs were initially set conservatively. The SDLPs may be adjusted upward in future years if performance significantly exceeds the SDLPs.

Respondent #8

Comments submitted on behalf of: As an Individual

Stakeholder Group: Representatives of Secondary CTE Programs

County: Saginaw

Support the Plan: Yes

COMMENTS: It explains the process very clear.

RESPONSE: none required

Respondent #9

Comments submitted on behalf of: As an Individual

Stakeholder Group: Members and Representatives of Special Populations

County: Kalamazoo

Support the Plan: Support with minor revisions

COMMENTS:

Section D2: These levels could be broken out by different special populations, such as students with disabilities, multilingual learners, unhoused students. This would help to highlight these student groups and the importance of supporting their unique needs within CTE programs.

RESPONSE: The Perkins State Plan guide provided by U.S. Department of Education does not provide space to insert State Determined Levels of Performance (SDLPs) by population categories. However the Michigan Department of Education and Michigan Department of Labor and Economic Opportunity publish Perkins Core Performance Indicator (CPI) performance by race, gender and special population categories in report and dashboard form. Secondary performance can be found at analytics.cteis.com. Postsecondary performance can be found at <https://www.michigancc.net/CCData/CorePerformanceIndicators/default.aspx>. Additionally, Perkins subrecipients are required to analyze their performance data by race, gender and special population category as part of the semiannual Comprehensive Local Needs Assessment (CLNA) and identify strategies for improvement in the annual subrecipient Perkins application for funding and in the Local or Regional Improvement Plan if the subrecipient fails to meet 90% of the overall SDLP.

Respondent #10

Comments submitted on behalf of: As an Individual

Stakeholder Group: Representatives of Secondary CTE Programs

County: Lenawee

Support the Plan: Yes

COMMENTS:

Section IV: The state levels are difficult as most CTE programs don't get the students until after they have tested, typically when they are juniors and/or seniors. Yet are still held to the scores.

RESPONSE: The Michigan Department of Education concurs that the 11th grade reading, math and science achievement tests upon which Core Performance Indicators (CPIs) 2S1, 2S2, and 2S3 (Reading, Math, and Science Achievement) are based are taken by many students before the student has enrolled in a CTE program. Therefore, any improvement in reading, math or science while or after a student enrolled in CTE will not be reflected in the 2S1, 2S2, 2S3 Reading, Math and Science Attainment Core Performance Indicators.

Respondent #11

Comments submitted on behalf of: As an Individual

Stakeholder Group: Parents

County: Grand Traverse

Support the Plan: Support with minor revisions

COMMENTS:

Section IV: The state needs to support Microsoft Imagine Academy again. This leads to student certifications required by CTE competencies, but schools are left to fund this on their own. These certifications lead to jobs for students. Improve the funding for them.

RESPONSE: Thank you for the input however funding appropriation decisions are outside the authority of the Michigan Department of Education and Michigan Department of Labor and Economic Opportunity.

Respondent #12

Comments submitted on behalf of: As an Individual

Stakeholder Group: Teachers

County: Hillsdale

Support the Plan: Don't support the plan

COMMENTS: [None]

RESPONSE: none required

Respondent #13

Comments submitted on behalf of: As an Individual

Stakeholder Group: Representatives of Secondary CTE Programs

County: Kalamazoo

Support the Plan: Support with minor revisions

COMMENTS:

Section IV: As the levels reflect SAT scores that were taken when students were in April of their 11th grade year they do not accurately reflect the performance levels of the completing 12th grade students. A better measure needs to be found. Be careful not to increase the levels too much as the CTE centers/programs have little effect on these students.

RESPONSE: The Michigan Department of Education acknowledges that the 11th grade reading, math and science achievement tests upon which Core Performance Indicators (CPIs) 2S1, 2S2, and 2S3 (Reading, Math, and Science Achievement) are based are taken by many students before the student has enrolled in a CTE program. Therefore, any improvement in reading, math or science while or after a student enrolled in CTE will not be reflected in the 2S1, 2S2, 2S3 Reading, Math and Science Attainment Core Performance Indicators. The Carl D. Perkins act requires states to report the performance of CTE concentrators on the 11th grade reading, math, and science assessments utilized by the state for Every Student Succeeds Act (ESSA). See section 113(b)(2)(A)(ii) of the Strengthening Career and Technical Education for the 21st Century (Perkins V) act, PL 115-224, Enacted July 31, 2018.

Respondent #14

Comments submitted on behalf of: As an Individual

Stakeholder Group: Employers

County:

Support the Plan: Support with minor revisions

COMMENTS:

Section D1: adequate

Section D2: State recognized credentials are not equitable for all groups of students.

Section D3: The state recognized credential list should be more comprehensive. Listen to people in the industry to know what should and should not be accepted.

RESPONSE: Industry credentials are being reviewed and approved through the Career Pathways Grant (CPG) project--a collaborative grant opportunity to fund secondary/postsecondary and employer partnerships to develop seamless programs of study aligned to local labor market needs and student interests; with learner-friendly on-ramps and off-ramps, that culminate in postsecondary recognized credentials and provide an opportunity for credit at the postsecondary level. Grant recipients work with and survey Michigan employers to identify the competencies and credentials valued by employers and link credentials to state Career and Technical Education (CTE) program standards and ensure aligned, high quality CTE programs of study. This process ensures that the credentials approved for Perkins reporting are identified with industry and/or employer input. In addition, postsecondary awards (Associate Degrees), certificates of completion of a registered apprenticeship, and state and national licenses are included in the measure of recognized postsecondary credentials.

Respondent #15

Comments submitted on behalf of: As an Individual

Stakeholder Group: Representatives of Secondary CTE Programs

County: Kent

Support the Plan: Yes

COMMENTS:

Section D1: The SDLP's meet the requirements of the law to my understanding.

Section IV: Appropriate levels of performance have been set.

RESPONSE: none required

Respondent #16

Comments submitted on behalf of: As an Individual & Kids with IEPs

Stakeholder Group: Parents

County: Lenawee

Support the Plan: Support with minor revisions

COMMENTS:

Section D1: Nowhere have you addressed the fact that students are told they have to give up their IEP to get into CTE program. Isn't that illegal?

RESPONSE: Students have the right to enroll in CTE programs based on federal laws.

Parents/students do not have to divulge a student's Individualized Education Program (IEP) before enrolling a student in a CTE program. This is discriminatory. CTE is not a placement, but students are enrolled in CTE courses. Students with an IEP are given the same opportunities as students in the general education curriculum to enroll in a CTE course. If the student is unable to perform tasks in the course and progress is not being made toward the student's annual goals in the IEP, then the IEP team must reconvene to revise the IEP, as appropriate to address the lack of progress toward annual goals and in the general education curriculum. Agencies may not deny a student with a disability access to a CTE program or course because of the need for special education supports and services. If necessary, an agency must make equipment accommodations, adapt the manner in which the courses are offered, house the courses in facilities that are readily accessible to students, and provide supplementary aids and services to assure an appropriate education as outlined in the student's IEP or 504 Plan. Section 6 of the Office of Career and Technical Education CTE Administrator Guide provides detailed information regarding participation of students with disabilities and/or an IEP at <https://www.michigan.gov/mde/services/octe/educators/cte-administrators/cte-administrator-manual>. Information regarding civil rights, including contact information for the Michigan

Department of Education Civil Rights Coordinator can be found on the Michigan Department of Education Civil Rights Compliance website:

<https://www.michigan.gov/mde/services/octe/educators/funding-monitoring/monitoring/civil-rights-compliance>.

(ff) take into account the extent to which the State determined levels of performance advance the eligible agency's goals, as set forth in the State plan.

Michigan’s challenging goal of identifying credentials of value for secondary CTE programs and our indicator baselines align with Michigan’s Top 10 Strategic Education Plan goals. “In particular, the SDLPs align with goals 4. Expand secondary learning opportunities for all students 5. Increase the percentage of all students who graduate from high school and 6. Increase the percentage of adults with a postsecondary credential.”. The table under item c shows how Michigan’s Perkins indicators align with Michigan’s ESSA indicators.

c. a description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

The table below shows how Michigan’s Perkins indicators align with Michigan’s ESSA indicators. (2024-25).

Perkins CPI	Perkins Proposed SDLP	ESSA Components	Michigan ESSA Target
1S1 – Four-Year Graduation Rate	95.40%	ESSA 1: Four Year Graduation Rate	84.78%
2S1 – Academic Proficiency in Reading Language Arts	54.90%	ESSA 2: Proficiency - 11 th grade proficiency on the M-Step, SAT, and MI-Access ELA test	45.92%
2S2 – Academic Proficiency in Mathematics	34.20%	ESSA 3: Proficiency - 11 th grade proficiency on the M-Step, SAT, and MI-Access Math test	32.78%
2S3 – Academic Proficiency in Science	13.30%	ESSA 4: Proficiency - 11 th grade proficiency on the M-Step, SAT, and MI-Access Science test	N/A
3S1 – Post-Program Placement	95.10%	ESSA 5: No Component	N/A
4S1 – Nontraditional Program Concentration	27.40%	ESSA 6: No Component	N/A
5S1 – Program Quality-Attained Recognized Postsecondary Credential	8.40%	ESSA 7: School Quality, as some elements of School Quality align (i.e. Postsecondary alignment) advanced coursework includes CTE completers	N/A

As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

The MDE - OCTE calculated the baseline for the secondary indicators graduation rate, academic proficiency (Reading, Math and Science), post-program placement, and nontraditional concentration using the average actual performance of the two most recently completed program years.

4. Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V).

See public comments and written responses under 3.b. (cc) have been subject to the public comment process described in subparagraph (B), and the eligible agency has provided a written response (above)