



INDIANA COMMISSION *for* HIGHER EDUCATION

Indiana's 2024-2027 Perkins State Plan Response to Public Comment

Public Comment Period:

Indiana's 2024-2027 Perkins State Plan (State Plan) was posted online for public review and comment beginning March 8, 2024, and ending on April 12, 2024. An online feedback form was included for gathering comments and shared widely with various stakeholders. In addition to being posted online, Career and Technical Education (CTE) staff from the Indiana Commission for Higher Education (CHE) also held a public webinar to generate awareness of the State Plan. Additionally, highlights of the Plan were shared with secondary and postsecondary recipients.

We would like to take this opportunity to thank all the individuals and organizations that have been involved in the development process for the State Plan, especially the individuals that reviewed the Plan and offered comments. All public comments received have been shared below in their entirety and were not edited.

Favorable Comments:

I am pleased to see an official process in place in order for a high school to separate from an existing CTE district and split up the Perkins allocation. Too many high schools believe they can offer high quality CTE programming by stripping away small amounts of Perkins funding from their area district and starting their own "career center" in-house.

We appreciate the emphasis placed on industry and employer engagement and CTE accessibility in Indiana's vision for CTE, as well as the inclusion of Building and Construction under the six priority areas.

Page 14, 15 - improved communication and engagement with post-secondary.

Page 33 - Size, Scope, and Quality definitions are easier to understand.

Overall, there is more concise language and descriptions of actions and activities as they align to federal regulations.

Overall, this is a solid plan that includes many of the activities that we are working on in our secondary CTE programs. I appreciate the emphasis on special populations through a transition advisory council and continuation of the equity labs. At one time (early 2000s), Indiana (when CTE was at IDOE) employed a Special Populations Coordinator who would coordinate with CTE districts around the state in developing regional PD sessions, non-traditional events (women in trades) and provide technical assistance.



Suggestions/Concerns:

On page 28, section B. subsection 2 D, the plan details the NLPS alignment to postsecondary courses at Ivy Tech and Vincennes. There is some mention here in the fourth paragraph about the industry certifications available to students that also fulfil graduation requirements. ICRF would advocate for this kind of language that includes these certifications as viable options be more prevalent throughout the plan, clearly stating that industry-certifications are wonderful options for CTE students. Matriculating straight into the workforce is just as important as choosing college.

Indiana, like most other states, uses an integrated career pathway model for their programs of study that allows for multiple exit and re-entry points (pg. 11). This model allows individuals the opportunity to pursue postsecondary education and training while still having the option of exiting to the workforce when they are ready. These exit and re-entry points are important for individuals who enter the workforce and later want to gain additional education and training. Individuals have the opportunity to re-enter education and training where they left off without having to start over.

The State Plan references postsecondary credentials several times. Postsecondary credentials are defined in Perkins as industry recognized credentials (IRC), like certifications and licenses, and postsecondary certificates and degrees. IRC are an important component integrated into the pathway model whenever they are available. IRC are critical for providing individuals the opportunity to earn a credential and being ready to exit prior to completion of short- or long-term postsecondary certificates.

On Page 33, section B. subsection 2 H, size, scope and quality: To put in place the minimum programs of study and career clusters offered puts incredible amounts of pressure on small or independent schools who are without access to larger career centers. In turn, the state career centers are increasingly exclusive for students. This kind of restriction will only restrict student access to CTE classes across the state. We propose decreasing the minimum programs of study and career clusters to ensure that more students have the opportunity to participate in CTE classes even on a smaller scale.

Indiana has enjoyed tremendous growth in the number of programs offered and the number of students participating in CTE. Indiana's investment in secondary CTE enrollment funding and the implementation of Graduation Pathways have both contributed to this growth. The minimum requirements for size, scope, and quality outlined in the plan only pertain to eligible recipients of federal Perkins funds. These requirements should not prohibit nor impact any comprehensive school from developing and operating CTE courses and programs.

On Page 8, section B. subsection 1 B, The Commission's HOPE Agenda: We would like to clarify the language in this HOPE Agenda around "postsecondary attainment." As we measure this data and work towards this goal, we want to be sure it includes achievements in industry credentials that lead into jobs that provide "economic and social mobility and prosperity."

The Commission defines postsecondary attainment as any education or training beyond high school. As previously mentioned, CTE focuses on all forms of postsecondary credentials, including industry recognized certifications and postsecondary certificates and degrees.



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Page 13 - Recruit, Prepare, Retain CTE Teachers - This is a critical area, and as we move to incorporate more opportunities relating to the high school student experience, I believe the Workplace Specialist program needs to be redesigned to help teachers incorporate these aspects of student engagement and learning as well. IACTE and CHE should collaborate to make this program more robust and transparent regarding the data analysis (does this happen?) from this required usage and more networks for CTE teachers to collaborate should be considered.

The Workplace Specialist program is a tremendous asset for helping individuals with industry experience transition to being classroom teachers and is one of the programs supported through Perkins leadership funds. Over the last year, CTE staff have been working to better define measurable targets and deliverables for all leadership contracts, as it is critical for CHE to ensure that programs supported with Perkins funds are meeting the needs of all stakeholders. CHE, in collaboration with the Indiana Department of Education (IDOE) and other stakeholders, plans to complete a comprehensive review of the Workplace Specialist program in 2024.

While the State conference is a great option for professional development, it's not always feasible for folks to attend. There should be a way for CTE teachers to have access to a New and Newer type session throughout the year.

For the last few years, CTE staff have collaborated with the Indiana Association for Career and Technical Education (IACTE) on several projects designed to provide teachers with additional professional development opportunities, including support for IACTE's Focus Ed program.

Transitioning CTE to CHE has given us the opportunity to onboard 3 program managers. Increasing the number of program managers improves the CTE team's ability to provide greater technical assistance. Technical assistance may take the form of additional webinars and professional development opportunities as suggested.

Performance Data Labs Page 15 - please include working closely with Ivy Tech's Data Analytics team as robust data is available and disseminated to faculty and staff.

The lack of quality data has been the primary barrier to completing Performance Data Labs at the postsecondary level. The CTE staff plan to collaborate with both postsecondary partners over the next year to identify the needed data and to modify the current Performance Data Labs process to fit a postsecondary model.

Comprehensive Local Needs Assessment (CLNA) page 20 - Although this process has improved in the past two years, it is an arduous process consuming many hours of time. Can this process be streamlined, or example provided?

The process is designed to serve as an extensive review of district level needs and to meet all federal requirements. However, the CTE team attempts to model a vision of continuous improvement in all its processes. The current CLNA review process has provided opportunities to identify areas where the process may be streamlined, as well as to identify areas where additional clarification or exemplar responses are needed.



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Page 44 - It is good that the indicators have been realigned to provide more accurate data; however, the new post-secondary indicators are set too high as fewer than half of the campuses, based on 22-23 data, will be able to achieve 64 for 1P1 and 50 for 2P1 for FY2024. The indicators seem to favor smaller campuses.

The 1P1 (64%) and 2P1 (50%) targets are statewide performance metrics. Once the plan is approved, CHE will work with each postsecondary recipient to establish local performance targets based on their individual performance levels.

The targets were determined by calculating the baseline performance level for all institutions. This essentially creates a weighted average for the state which would explain some campuses being above and others below the targeted level. CHE is required to propose a performance level that leads to growth or improvement upon the baseline or previous year's performance.

I heard Ivy Tech Community College will be a single recipient. I could not find this in the plan. I think this will hurt local campuses.

CTE staff have received questions from the US Department of Education (US DOE) and other compliance consultants regarding why Ivy Tech Community College, as a singly accredited institution, is treated as multiple recipients. CHE plans to further research this topic over the next two years. If it is determined a move to a single recipient is necessary, the change would be included in the plan update required prior to FY 2026. The research over the next two years will include determining what the impact would be for the local campuses.

On page 46, the denominator for 2P1 should be based on the entire starting cohort rather than only the exiting concentrators. On page 42, it is stated that the denominator for postsecondary credential attainment is the unduplicated number of CTE concentrators in the reporting cohort. This seems inconsistent. A standard best practice is to create a cohort based on first-time, full-time freshmen.

Several other states use an exit cohort for reporting postsecondary metrics for Perkins. Given the various lengths of postsecondary programs (15, 30, 60, ... credit hours), using an entry cohort (first-time, full-time freshmen) is challenging because data must be pulled from multiple years and multiple cohorts. Creating an exit cohort will help to improve the transparency of our postsecondary data by creating a single cohort that uses a consistent number of concentrators for each performance metric.

For 1P1, is post program placement relevant for students who did not complete a credential, i.e. should they be included in the denominator?

Program completion has and will continue to be a requirement for being included in the placement performance metric. The only aspects that will change include the use of an exit cohort and concentrators not found through public institution enrollment data, National Clearinghouse data, and unemployment insurance will not be removed from the denominator. This methodology is consistent with our calculation methods for placement of secondary students.



Additional Comments/Questions:

As the state of Indiana works to make sure its people are in sustainable jobs that support themselves and the economy, we want to make sure that the state is inclusive about non-college options for students. An industry certification that results in a high school graduate going directly into the workforce is just as valuable as college credits received in high school. Let us not forget that there are plenty of prosperous jobs that do not require college or community college degrees. Please continue to make sure these have a place moving forward.

Postsecondary attainment includes any education or training beyond high school. As previously mentioned, CTE focuses on postsecondary credentials including industry recognized certifications as well as postsecondary certificates and degrees.

Page 16 - How can Ivy Tech take advantage of funding for Career and Technical Student Organizations? Is there a master list of approved CTSOs?

Indiana recognizes all eight of the current members of the National Coordinating Council for Career and Technical Student Organizations (CTSO). State Leadership funds are distributed to the state chapters for each CTSO to help support activities including leadership training and competitions. The state leadership for each CTSO works with CHE staff to determine how funds will be utilized in compliance with Perkins.

How will data be collected to determine work-based learning? Please clarify.

Work-based learning (WBL) participation is already a performance metric for secondary CTE programs. CHE is considering expansion of this metric to postsecondary. This metric would likely be used as an internal measure and would not be reported to US DOE. There are several questions that would need to be answered before adding this metric, including what would count and how would this data be collected.

Page 26 - Post-secondary needs a course inventory for Work-based Learning and a better tracking system for students with WBL that is outside of courses.

We appreciate the recommendation and will explore this possibility. Gathering data for WBL continues to be a challenge for both the secondary and postsecondary level. As mentioned in the response to the previous comment, how to collect the necessary data would be one of the primary questions that would need to be answered before adding this as a metric.