

Strengthening Career and Technical Education for the 21st Century (Perkins V)

Minnesota Perkins V State Plan Annual Revision: July 1, 2024 – June 30, 2025





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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: Minnesota
- B. Eligible Agency (State Board) submitting on behalf of the State: Minnesota State Colleges and Universities
- C. State Agency delegated responsibilities by Eligible Agency under section 131(b) for the administration, operation, or supervision of the State plan (*if applicable*):
- D. Individual serving as the State Director for Career and Technical Education:
 - 1. Name: Karl R. Ohrn
 - 2. Official Position Title: System Director of Career and Technical Education
 - 3. Agency: Minnesota State
 - 4. Telephone: 651-201-1650
 - 5. Email: karl.ohrn@minnstate.edu
- E. Type of Perkins V State Plan Submission Subsequent Years (Check one):
 - □ New State Plan (FY 2024-27) if an eligible agency selects this option, it will then complete Items F, G, and H.
 - ⊠ State Plan Revisions (Please indicate year of submission: 2024) *if an eligible agency selects this option, it will then complete Item F.*

F.	Submitting Perkins V State Plan as Part of a Workforce Innovation and Opportunities Act (WIOA) Combined State Plan Subsequent Years (<i>Check one</i>):
	☑ Yes (If yes, please indicate year of submission: 2024)☑ No
G.	Governor's Joint Signatory Authority of the Perkins V State Plan (Fill in text box and then check one box below):
	 ☑ 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.
	Date governor was sent State Plan for signature: 01/31/2020

H. Lead Individuals Completing This Plan: Karl R. Ohrn

- I. 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 is true and correct.

Authorized Representative Identified in Item C Above:	Telephone:		
Karl R. Ohrn	651-201-1650		
Signature of Authorized Representative	Date:		
Hall R. Ohm	5/10/2024		

Introduction

Notice to Reviewers: Following the enactment of Perkins V legislation in July, 2018, Minnesota submitted a four-year State Plan covering the period of July 1, 2020 through June 30, 2024. With the end date of the initial Perkins V State Plan approaching, states were given the option of writing a new four-year state plan covering the period of July 1, 2024 through June 30, 2028 (Option #1), or continuing annual revisions of the original plan (Option #2). Using option #2, this plan is an annual revision to the original Four-Year State Plan. In addition to the changes/updates made here, all information regarding development of the original plan remains for historical purposes. Please note that throughout this revised plan, the first Four-Year State Plan is referred to as the <u>original</u> or <u>initial</u> plan.

Strengthening Career and Technical Education for the 21st Century (Perkins V)

VISION

Advancing career and technical education empowers every learner to realize a rewarding career.

MISSION

Quality career and technical education ensures every learner has equitable access to careerconnected learning through a network of knowledgeable partners.

The Carl D. Perkins Act was reauthorized by Congress as the *Strengthening Career and Technical Education for the Twenty First Century Act* (Perkins V). Perkins V went into effect July 1, 2019. Minnesota used fiscal year 2020 beginning on July 1, 2019, to transition to the new requirements of the law. The reauthorization presented an opportunity for Minnesota to reaffirm its commitment to career and technical education with the formation of a new vision and mission as documented above.

Minnesota has structured its implementation of federal Perkins funding through a consortium model with three key components: Minnesota State, Minnesota Department of Education, and local consortia. This model of governance and distribution of funds has provided a tradition of alignment of secondary and postsecondary partners started under Perkins IV and continues with the *Strengthening Career and Technical Education for the 21*st *Century Act* (Perkins V). Minnesota State, the eligible agency, will continue to oversee the administration and implementation of the state's Perkins grant in partnership with the Minnesota Department of Education. Through the Perkins V state plan, the State has an opportunity to exercise a variety of leadership levers to advance the state's vision for Career and Technical Education (CTE).

Perkins V provides opportunities to model, incentivize support, and drive change. Key goals that comply with the Perkins V federal legislation and state needs include:

- Align local/regional CTE work with the completion of a comprehensive local needs
 assessment (CLNA) at minimum, once every 2 years, requiring funding decisions to be
 driven by data including aligning programs of study with high-skill, high-wage, and indemand current and emerging occupations.
- Support the recruitment, preparation, retention, training, and professional development of teachers and faculty, administrators, specialized personnel, and paraprofessionals to meet both traditional and alternative state certification and licensure requirements.
- Continue an equal percent distribution of funds to undergird equity of educational opportunity for both secondary and postsecondary learners at the local consortium level.
- Target innovation and improvement using reserve funding as allowed in Perkins V. This includes leveraging the reserve fund for rural and high-CTE-concentrated consortia to spur innovation, support programs of study, encourage alignment and collaboration, and address equity gaps.
- Set separate updated **state-determined performance levels** for secondary and postsecondary partners. This necessitates technical assistance at the state and local consortia.
- Support an expansion of data review and performance expectations for categories of student groups and special populations as defined by ESSA.
- Continue to support consortia funding for **CTE exploration with middle school** students.

Programs of study is a federal Perkins term that means "a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level..." (Perkins V, Section 3(41)). This requirement for programs of study is unique to Perkins law yet builds on the pathways work referenced in the Workforce Innovation and Opportunity Act (WIOA).

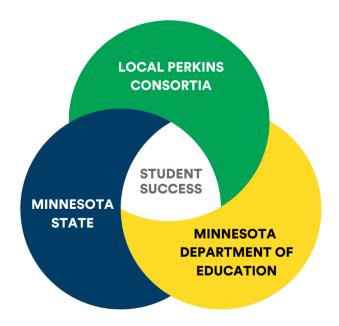
In general, there are finite fiscal resources to provide high-quality career and technical educational opportunities for Minnesota students. The *Strengthening Career and Technical Education for the 21*st *Century Act*, as dedicated federal funding, does provide leverage for supporting the critical role of the state in providing educational opportunities for our CTE students. However, the workload requirement of the CLNA, new performance indicators, the expansion of special population categories, the rising cost of equipment and supplies needed for CTE programming, and the scarcity of qualified instructors all necessitate that Perkins V will continue to ensure equitable opportunities for students' career and college success. Partnerships with other state agencies such as the Minnesota Department of Employment and Economic Development (DEED) and the Minnesota Department of Labor and Industry (DLI), as well as community-based organizations and other state initiatives such as the Minnesota State Centers of Excellence or Career and College Readiness, will continue to be part of the successful implementation of CTE.

II. Narrative Descriptions

What follows is the State's response to fulfilling the requirement for implementing Perkins V. The state of Minnesota is submitting this document in accordance with the US Department of Education's guide for the submission of state plans. The plan and all attachments are available on the <u>Public Comment Notice</u> webpage.

A. Plan Development and Consultation

 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.



As the eligible agency for the administration of Career and Technical Education in the state, Minnesota State Colleges and Universities, or Minnesota State, works closely in partnership with the Minnesota Department of Education's Career and College Success Division and local consortia to administer Perkins V throughout the state. Local consortia consist of participating school districts and two-year state colleges located within 23 distinct geographic areas encompassing the entire state. Through a collaborative partnership, together we ensure the successful development and implementation of the state plan. Because of this partnership of three, career and technical education initiatives have historically been proactive in aligning activities between secondary and postsecondary CTE programs, and promoting student success and seamless transitions from secondary to postsecondary educational opportunities. As an example of this alignment, Minnesota has a program of study rubric that promotes concurrent

enrollment, articulation agreements, and demonstrated authentic work experiences between school districts and community colleges/technical colleges and community employers. Additionally, extensive professional development will continue to support secondary and postsecondary partnerships for the development and continuous improvement of programs and Programs of Study, the recruitment and retention of educational professionals, and equity of access and services for every student.

One of the biggest challenges for Minnesota in the development of the Four-Year Perkins V plan is providing the right timing and balance between the needs and requirements of the state and the needs of local consortia. To achieve that balance, Minnesota's Perkins V plan development and consultation is the result of a combination of state and local efforts. The primary components of the plan development consisted of an extensive collaboration among the state staff, secondary and postsecondary, business and industry, and community partners. Structurally, the work began with a facilitated broad-based planning group to set the vision, mission, principles, and identify five strategic work groups: Advancing CTE, Career-connected Learning, Integrated Network, Equity and Inclusion, and Knowledgeable Experts. The plan development and the strategic workgroups involved state executive leadership work, consultation with our consortia leaders, public meetings, and incorporation of local input.

While consultations occurred at the state level with interested community representatives, advisory groups, superintendents, postsecondary academic administrators, teachers and faculty, the governor's office through the educational liaison, the Tribal Nation Education Council, and business groups, both engagement and consultation also occurred at the regional and local level through completion of the comprehensive local needs assessment work by all 23 Perkins consortia. Frameworks, critical questions, continuous improvement rubrics, equity plans--required components of the Perkins V plan--were developed at the state level with consultation and customization at the local level to address local students, community, and workforce needs. To facilitate the consultation process, Minnesota began its Perkins V work with the development of the comprehensive local needs assessment.

The Advancing CTE strategic work group was charged with developing a framework for the comprehensive local needs assessment (CLNA) and was also responsible for accountability, outreach, and promoting the CTE story through awareness and communication. The Career Connected Learning group reviewed and revised the state's career pathways projects with a priority on the development of shared standards and definitions of program quality and the integration of work-based learning (WBL). The career preparation aspects of career-connected learning also fell into the work of this group. The integrated network group was intended to provide more intentionality in our relationships with the multiple federal, state, and local networks necessary for successful CTE work. Equity and Inclusion, an integral part of the work of all the strategic work groups, focused on service partnerships, providing resources, and data management. The Knowledgeable Experts group oversees the critical professional development and technical assistance role of Perkins V. Teacher licensure preparation programs and minimum qualifications, the mentor/mentee project, consortia leadership, and responding to local requests are the tasks of this group.

Much research, input, and development went into the creation of Minnesota's *Comprehensive Local Needs Assessment (CLNA) Guide* and *Framework* for the original state plan. The needs assessment is viewed as one of the most significant levers for change introduced with Perkins V. The CLNA changes the dynamics and habits of Perkins IV with the requirement to base budget development on its outcomes. Aligning business priorities has always been an essential component of Perkins work with an increasing need to make that connection through the comprehensive local needs assessment. The CLNA and Application processes were reviewed as part of updating the four-year state plan. Based on feedback from consortium leaders and state staff, the CLNA Framework document was revised to be the *CLNA Results and Priorities* template, providing a clearer structure for consortia to report on the results of the CLNA and identify the key needs. The new *CLNA Results & Priorities* template will be submitted to OCTAE with the 2024 State Plan.

Beginning in October of 2018, day-long workshops, webinars, face-to-face meetings, and virtual mentoring, along with professional development prepared local consortium leaders and work groups for the relevancy of, and work required, to complete the CLNA. The CLNA Guide provides Minnesota Perkins consortium leaders with context on how to conduct the CLNA and translates language of the law into concrete, actionable steps for conducting a rigorous needs assessment that meets the *Strengthening Career and Technical Education for the 21*st *Century Act* requirements. When the CLNA is complete, a consortium will have findings that provide an accurate picture of local CTE programs and learners. It creates an incredible opportunity to:

- assist students toward achieving career success,
- align Perkins budgets with priorities and ensure that programs are aligned with and validated by local/regional workforce needs and economic priorities,
- ensure that consortium programs are serving all learners equitably and to focus
 resources on programs that lead to high-skill, high-wage, or in-demand occupations
 while addressing disparities or gaps in performance,
- build on other process improvement efforts such as ESSA, WIOA, World's Best Workforce etc., and
- provide a structured way to engage programmatic partners regularly around the quality and impact of consortium CTE programs and systems.

Ultimately, the local needs assessment process is about helping applicants make a formal shift from merely collecting and reporting information to using information strategically to drive decisions about consortium CTE programs that lead to success for students, employers, and the community.

To mentor consortia in the implementation of the CLNA, Minnesota uses a six-step process: prepare, explore, assess, prioritize, communicate, and evaluate. The Perkins state executive team focuses on the continuous improvement of processes so that local consortia can complete their work efficiently and effectively. The gathering of the local programmatic partnership

groups and the prioritization of regional work comes from these efforts. From the CLNA data gathering and analysis, consortia formulate actions to address gaps and enhance successes. Resources needed to implement those actions are the basis for the development of the local budget request.

The information obtained from both the CLNA and the full set of consortium applications includes the reflection of local consultations. This information is reviewed by the state leadership team. Final strategies and actions for the work of the state are guided by feedback from that submission. The information also informs state leadership regarding professional development and technical assistance needs.

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)

Minnesota has structured its implementation of federal Perkins funding through a three-pronged model: Minnesota State, Minnesota Department of Education, and the local consortia. This model of governance and distribution of funds has provided a tradition of alignment of secondary and postsecondary partners that will continue with the *Strengthening Career and Technical Education for the 21st Century Act* (Perkins V).

Minnesota State, the eligible agency, continues to oversee the administration and implementation of the state's Perkins grant with our Minnesota Department of Education partners. The Perkins V Four-Year State Plan will continue to advance Minnesota's vision for Career Technical Education (CTE) by maintaining the 50:50 fiscal split between secondary and postsecondary, the fifteen percent level for reserve funding, and the utilization of data-driven decisions through the CLNA process.

The major responsibility for postsecondary career and technical education resides with the Minnesota State Academic and Student Affairs (ASA) units; specifically, research, educational innovations, and academic affairs. These ASA units support CTE work for such initiatives as early college opportunities, program approvals and transfer, data research and reporting, accessibility services, and faculty credentialing, --all essential for the success of our learners. The CTE unit also works closely with the Equity and Inclusion division of Minnesota State,

especially in the execution of the federal OCR requirements and overall professional development committed to support, protect, and encourage inclusive opportunities through the system.

As a separate but partnered agency, the Minnesota Department of Education, Career and College Success Division, Office of Career and Technical Education provides oversight for secondary education. The CTE unit advances educational initiatives in collaboration with other secondary agency Divisions including Indian Education, School Support, Academic Standards and Instructional Effectiveness, Research and Assessment, Equity and Achievement, Early Learning and State Library Services. Initiatives included:

- Farm-to-Table Culinary Curriculum
- CTE Safety Protocol development and communication
- Collaboration with PELSB to implement the Tiered Licensing System
- CTE Levy technical support for school districts
- CTE curriculum framework development for all CTE program areas
- Professional development on continuous improvement
- Integration of quality program assessment measures in school district Program Approval processes
- Data research reporting and analysis support for local school districts

The CTE Unit also participates as part of the Minnesota Department of Education Academic Success Team comprised of curriculum and instruction, school support, assessment, and other agency divisions.

The Perkins allocation for the state of Minnesota was approximately \$21.3 million in FY24. Minnesota State is the fiscal agent for the grant and, as such, utilizes 5% of the allocation for Administration. Using Perkins V funding levers to help drive meaningful change, Minnesota's Perkins V plan demonstrates that the consortium model empowers equal partnerships to make joint decisions to collaboratively plan and implement CTE programs and services. The initial Perkins V state plan reflected changes in the funding distribution model as shown below; this updated plan will continue with the same distribution percentages.

1) Distribution of the 85% of the state allocation provided to the local consortium applicants:

Basic Revenue: 85% (of the 85%) will be distributed utilizing the current formula process

Reserve Revenue: 15% (of the 85%) will be distributed between rural and high numbers of CTE concentrators

Secondary/postsecondary split: 50:50 in all calculations, basic and reserve

2) **State Leadership**: the secondary/postsecondary split of state leadership funds will be distributed as 42% secondary and 58% postsecondary.

State Institutions and Nontraditional will continue to be part of the leadership funds allocated to postsecondary. Minnesota State also will continue to fund major statewide work such as the annual conferences, and communication and software supporting the local applications with that higher percentage of leadership funds.

Planning teams and Perkins state leadership researched and considered utilizing the RFP process to distribute the 15% reserve funding competitively to provide potentially larger investments to consortia selected to receive this funding. Feedback received on this was not supportive of the change prior to the submission of the first Perkins V state plan. Minnesota also considered alternative ways to distribute reserve funding with the revised four-year state plan, but data showed that percentage changes would negatively impact rural consortia. As a result, state leadership decided to continue the formula distribution model at this time.

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

Minnesota State and MDE state staff held an in-person meeting with Minnesota Consortium Leaders at the Annual Perkins Leaders Fall Meeting on October 30, 2023, to provide an overview of the 2024 State Plan draft and to collect input on the use of Reserve Funds and proposed changes to the CLNA reporting form and the Local Application template. State staff facilitated discussion and provided "Your Input Matters" forms to collect feedback. In addition, a webinar with Perkins Leaders was held on December 14, 2023, to provide updates on the use of Reserve Funds and the revised template forms based on the feedback. The public comment process and the state plan submittal timeline, including the WIOA submittal requirements were also reviewed.

Minnesota sought public comment on the proposed 2024 State Plan and the State Determined Performance Levels (SDPLs) for all six secondary and all three postsecondary core performance indicators. The *Minnesota Perkins V Public Comment Engagement Plan* was followed to notify and seek feedback from a broad representation of the public, including, but not limited to, secondary and postsecondary educators and staff, students, parents, community members, and industry partners. The Public Comment Notice webpage provided the purpose, guiding principles, documents, timeline, and form for submitting feedback. For those who did not wish to use the online form, an email address was provided where comments could be submitted (PublicComments@minnstate.edu). Comments were accepted December 8, 2023 through 11:59 pm January 7, 2024. All public comments received were collected via an online form. Public comments with responses on the State-Determined Performance Levels (SDPLs) are presented under section D, Accountability for Results, #4. All state plan public comments with responses from Minnesota State and MDE are provided in the Appendix. No comments were submitted to the email inbox.

The public notice to comment was sent to multiple groups, asking them for their input on the state plan and proposed core indicator state-determined performance levels. The primary method for distributing the public comment notice was through email and LISTSERVS, which tended to be the most reliable method to reach the groups. Recipients of these emails were asked to forward and share the public comment notice with their contacts to reach the widest audience possible. The public comment page linked in the email provided readers with instructions on how to submit their comments, supporting documents, a purpose statement, and a call to action.

The table below provides details regarding the dates the communications were sent, the targeted audience, and the method/vehicle for distribution. There were also instances of informal sharing of the public comment opportunity by MDE and Minnesota State staff at various in-person or webinar meetings that occurred prior to and during the month in which public comments were being accepted.

Date Communication Sent	Target Audience	Method/Vehicle for Distribution
Dec. 8	Minnesota State Academic and Student Affairs college and university	ASA Newsletter (online)
Dec. 8	Perkins consortium Leaders and coordinators LISTSERV Note: Emails sent 12/8/2023, 12/28/2023	Email
Dec. 8	MDE CTE Staff via Perkins Leaders LISTSERV Note: Emails sent 12/8/2023, 12/28/2023	Email
Dec. 8	Minnesota State INSTRESEARCH listserv Note: Emails sent 12/8/2023 and 1/3/2024	Email
Dec. 8	MDE Data and Leadership	Email

Dec. 8	Minnesota State Board of Trustees	Email
Dec. 8	College and University Presidents	Email
Dec. 8	Academic and Student Affairs Groups	Minnesota State List Serv system
Dec. 8	MinnState Academic Support: Tutoring Professionals Multicultural Services Professionals	Email
Dec. 8	MinnState Workforce and Economic Development Division	Email
Dec. 8	Minnesota Centers of Excellence directors and communications staff (to reach business and industry associations and partners)	COE Communicators List Serv Center Directors
Dec. 8	College and University marketing and communications staff	Key Communicator List Serv
Dec. 8 -15	 MDE Specialists Secondary Teacher List Superintendent List Principal List Indigenous and Indian Tribes and Tribal Organizations AFNR Lists and MAELC Board MNHOSA List FCCLA/FCS List Work-Based Learning List Business List Trades and Industry List 	Email
Dec. 8	MDE Communications Staff	Email
Dec. 8	MDE Commissioner & Executive Leadership	Email
Dec. 8	Adult Basic Education	Email
Dec. 8	MN Governor's Office	Email
Dec. 8	MN Department of Labor	Email
Dec. 8	RealTime Talent and Chamber (business, industry, small business and workforce)	Email
Dec. 8	MnACTE and MACTA Professional Associations	Email

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Dec. 8-11	Indian Tribes & Tribal organizations/tribally	Email
	controlled colleges or universities	
Dec. 8	Juvenile Justice Facilities, Correctional	Email
	Institutions	
Dec. 8-11	Community organizations such as Greater	Email
Dec. 8-11	United Way, Goodwill-Easter, etc.	Liliali
	, ·	
Dec. 8	Other community organizations connected	Email
	with and serving special populations (e.g.,	
	students with disabilities, single parents,	
	English Language Learners, etc.	
Dec. 8	Special Populations – members and	Email
	representatives	
Dec. 8	MinnState System Office Equity and Inclusion	Email
	Office and diversity officers	
Dec. 8	Secondary Students:	Email
	MNFSO and CTSO (student groups)	
	Skillusa mn	
	BPA	
	DECA	
	FCCLA	
	HOSA	
Dec. 8	Postsecondary Students MinnState Student	Email
	Leadership Organizations:	
	LeadMN (2-year college)	
	Students United (2-year universities)	
Dec. 8	Business and Industry Partners:	Email
	Minnesota Precision Manufacturing Assoc.	
	Minnesota Hospital Association	
	Minnesota Technology Association	
	Minnesota Construction Association	
	Hospitality Minnesota	

The public comment online form asked responders to indicate what group(s) they identified with (teacher, faculty, specialized instructional support personnel, paraprofessional, school leader, authorized public chartering agencies/charter school leaders, employers, labor organizations, parents, students, Indian tribes and Tribal Organizations, community organization or other). The online form included space for the public to provide feedback on Minnesota's career and technical education priorities and activities outlined in the state plan and respond to three primary questions related to the SDPLs:

- Do the proposed state performance levels meet the requirements of the law?
- Do the proposed state performance levels support the improvement of all CTE concentrators, including subgroups of students as specified 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)?

• Do the proposed state performance levels support the needs of the local education and business community?

Individuals providing comments were also asked to specify the indicator they were commenting on (if comments were specific to one indicator) by noting the core indicator number in their comments.

All state plan public comments with responses from Minnesota State and MDE are provided in the Appendix. All written responses to the public comments regarding the SDPLs are provided in section D.4.

[Note to reader: The following information documents the public comment process for the original Perkins V four-year state plan established in 2020.]

Opportunities for public comment in person and in writing were provided through face-to-face meetings and webpages with questions, state documents, and provisions to allow individuals to provide written comments. Multiple public meetings were held at various times and locations to provide a wide range of opportunities for individuals to attend. A neutral contractor was hired to facilitate the public hearings to avoid any perception of control of the discussion by state leadership. Comments were collected and routed to the state leadership team for action. Direct comments were provided to state leadership through email correspondence. These were sent to the facilitator for inclusion in the feedback report.

Notifications of public hearings and the webpage address for input, including the performance indicators, were provided electronically to the following:

- Adult Basic Education
- Association of School District Homeless Liaisons
- Business and Industry Groups:
 - Minnesota Precision Manufacturing Association
 - Minnesota Hospital Organization
 - Minnesota Construction
 - Hospitality Minnesota
 - Minnesota Technology Association
 - Minnesota Bankers Association
- FCCLA
- General Public through Facebook, Twitter
- Minnesota Business Professionals of America (BPA) Board
- Minnesota Centers of Excellence: distribution to industry partners through the Centers
- Minnesota Chambers of Commerce
- Minnesota DECA Board
- Minnesota Governor's Office

- Minnesota State Academic and Student Affairs personnel including:
 - o administrators
 - faculty development
 - academic advisors
 - o accessibility coordinators
 - PSEO and concurrent enrollment directors
 - veterans
 - students
- Minnesota State Board of Trustees
- Minnesota superintendents
- Perkins consortium leaders and coordinators
- Professional associations: MnACTE, MACTA
- Secondary teacher list by MDE specialists
- SkillsUSA MN Board
- Special education directors
- Student organization advisors
- Variety of community organizations and foundations
- WIOA partners:
 - Department of Labor
 - o Department of Employment and Economic Development
 - Department of Human Services
 - Department of Corrections
 - Adult Basic Education

In addition, the front banner of the Minnesota State webpage highlighted the public hearing and provided a space for general and specific comments. The text provided is the following:

Minnesota State and Minnesota Department of Education invite you and the members of the community to attend and participate in public hearings to discuss the changes to the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). The focus of Perkins V is the alignment of systems and program improvement (Section 122(a)(3) State Plan requirement of The Act).

We are seeking your input on:

- proposed state determined performance levels,
- the alignment of programs of study to industry needs,
- financial distribution of funds,
- increasing student access to high-quality education, and
- supporting the full continuum of offerings from career exploration through preparations to meet the changing needs of learners and employers.

Public Comment and Hearing Update

Thank you for participating in these public hearing sessions. We are still accepting general comments and feedback on performance levels through Nov. 30, 2019.

Submit general comments

Submit comments on performance levels

During the public meetings, Minnesota State Staff provided an overview of the Perkins V plan and a neutral facilitator solicited feedback through a series of questions. Responses to the questions and an overview of discussion points have been collected in report form.

In addition to the series of public comment meetings, state staff met with Minnesota Tribal Nations Education Committee (TNEC) whose mission is to "strengthen, protect, and advance the overall education experiences and opportunities for all Tribal (American Indian) students, families, and communities of Minnesota." The notes of that discussion are included in the comment report attached. At the recommendation of that group, Tribal Nation contacts were cross-walked to current Perkins consortia so that Perkins leaders, in their CLNA work, would be inclusive of the Tribal Nation leadership.

Feedback on accountability factors occurred in a parallel but separate process, coming together in the public hearings and the posting of the full 4-year plan.

Secondary

Secondary and postsecondary accountability involves a collaboration between two agencies, each with its own data systems and internal processes. Therefore, transition planning for secondary accountability required a dual decision-making process. The process for identifying and defining secondary performance indicators occurred in two phases.

Phase one included an extensive information gathering process as well as documenting feedback from internal state staff. The purpose was to thoughtfully compile information and identify meaningful and specific questions to gather input during phase two. State CTE specialists attended five two-hour-long, in-person meetings in which they reviewed data files, policy documents, and ESSA requirements in addition to considering existing data collection systems and other available data sources. Staff considered all information and materials they reviewed through the lens of our state's recently updated mission and vision for Career and Technical Education as well as the following questions.

Does this data and information:

- 1) advance our statewide goals for CTE?
- 2) support all of our CTE students and approved programs?
- 3) support the needs of our Business and Industry partners as well as local communities?

- 4) align with the Perkins V legislation?
- 5) align with other existing state legislation?

Products from the phase one internal secondary CTE state staff meetings included a refined list of key decision-points, discussion questions to pose to the advisory group, and a list of materials and resources to broaden engagement.

Phase 2 involved sharing the previously identified information with secondary representatives to collect and compile their recommendations. The "Perkins V Secondary Accountability Technical Advising Committee" included secondary consortium leaders; postsecondary partners; local CTE policy and advocacy groups; school counselors; work-based learning (WBL) coordinators; high school teachers; principals; superintendents from rural, suburban, and large metro districts; business and industry leaders from each sector of the CTE Career Wheel; Workforce Center staff; and Tribal leaders. During spring 2019, approximately thirty advisory group members engaged in three four-hour in-person meetings. All resources and materials were made available within a secure site so participants could access the information at any point. During the facilitated in-person meetings, advisory group members discussed data sources, reviewed simulated historical data, and considered policy and legislative documents in small groups.

Advisory group members were asked to consider all information through the lens of the questions listed above as well as the following questions: Are all performance indicator definitions/measures valid, reliable, meaningful, and possess a high degree of integrity and transparency? Are they equitable across all student groups? Following each meeting, members were encouraged to discuss options and implications with their constituents and gather additional feedback that would ultimately inform their recommendations to the state.

Recommendations for specific performance indicator definitions were collected using an online survey tool; recommendations for the CTE Concentrator definition and program quality measures were collected using paper and pencil to document full thoughts and ideas. There were clear recommendations to the state regarding performance indicator definitions, updated CTE Concentrator definition, and the program quality indicator that was preferred.

Following the rollout of the full scope of the Perkins accountability system and performance-level methodology, recommendations made by the original workgroup came under review. Group members, district leaders, local partners, and state leadership staff probed the implications of each potential program quality indicator. Further discussion and questions, data, and state-level priorities were analyzed. These discussions resulted in MDE leadership carefully reviewing initial recommendations and making changes to the indicators. Original members of the technical advisory group as well as all secondary consortium leaders were invited to provide feedback on whether the state should move forward with the previously recommended optional "Other" indicator or if other solutions should be considered at the state level. Additional comments and feedback were gathered regarding the optional program quality performance indicator via a survey tool. Results of that survey prompted MDE leadership to

make changes based on the deeper research. The new indicators were posted, and the comment period was extended to meet the 60-day requirements.

Postsecondary

In developing postsecondary operational definitions and identifying data sources for participants, concentrators, and each indicator, the state created an accountability workgroup consisting of state research staff for secondary and postsecondary, the State Director of Career Technical Education, and the Interim Associate System Director of Career Technical Education. The workgroup met as needed, generally at least once a month, to provide updates regarding ongoing work, brainstorm solutions to issues that arose, and clarify any questions about process and timelines. Members of the workgroup then consulted with regional partners and determined our operational definitions and data sources were substantively similar. Consortium coordinators were given the opportunity to review and comment on legislative definitions and proposed operational definitions at the Minnesota Association of Career and Technical Administrators (MACTA) meeting in April (2019). Throughout May and June, as work on revising operational definitions, identifying data sources, and developing datasets progressed, key consortium coordinators and institutional research staff were engaged in phone calls and online meetings to provide feedback. In July, at a meeting of all consortium coordinators, the final draft of definitions and data sources used to develop the accountability datasets was presented and discussed. Finally, consortium coordinators and institutional research staff were presented with the final details regarding the accountability indicators in September.

State Determined Performance Levels (Secondary and Postsecondary)

In developing state-determined performance levels, in addition to the regular workgroup meetings, we consulted with regional partners in June and August and determined our methodology for establishing performance levels is relatively similar. We also consulted with Minnesota Department of Employment and Economic Development (DEED) throughout June specifically to better understand the statistical adjustment model used for the WIOA Performance Accountability System and discuss how it might apply to Perkins accountability indictors. An online meeting was held in September with consortium coordinators and institutional research staff where questions and feedback were discussed. In October, the state-determined performance levels were presented at regional public hearings and published on the Minnesota State website with a form that allows the public to submit comments. The state-determined performance levels with revisions from the public comment were presented at a meeting with all consortium coordinators in November.

Sensitive to the lack of public input, Minnesota also leveraged existing meetings and communications to solicit unstructured input, such as:

- CTE consortia leadership meeting
- Governor's Workforce Development Board meeting
- Local program advisory committee meetings

- Governor's Workforce Development Board meeting
- State CTE staff planning meetings
- Manufacturing cluster meetings
- Minnesota State Centers of Excellence meetings
- Minnesota State Academic and Students Affairs webinars, conferences, unit meetings
- One-on-one outreach
- Regional and local comprehensive local needs group meetings
- Regional superintendent meetings
- State CTE staff planning meetings,
- WIOA State Plan partnership meetings

Though multiple dates, times, and methodologies for input were presented, the State received few comments or suggestions. A neutral third party provided a summary overview of the consultation work collected. Three separate documents were available for review on the Minnesota State webpage: Minnesota Perkins V, Executive Summary, Public Comment Report; Minnesota Perkins V Secondary & Post-Secondary Indicator Report Summary; and Complete Discussion Notes. The conversation with the Tribal Nation Education Council did not follow the questions used in the public hearing but rather became a more general conversation about better communication and alignment with career and technical education initiatives.

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)

The State of Minnesota continues to support workforce development activities through the collaborative work led by the Governor's Workforce Development Board (GWDB), the Minnesota Association of Workforce Boards (MAWB) and the Minnesota Department of Employment and Economic Development (DEED) through the unified public workforce system under the name CareerForce. In addition, specific grants through the Minnesota Department of Labor and Industry (DLI) and the Office of Higher Education (OHE) support career pathways, teacher recruitment, and students directly. Both Minnesota State and the Minnesota Department of Education are also partners in this work.

Key workforce development activities include:

CareerForce

In a collaborative effort led by the GWDB, MAWB, and DEED, a unified public workforce system continues to unify Minnesota's workforce development services through the almost 50 CareerForce locations around the state and the online labor exchange, career services and resources. CareerForceMN features innovative career planning tools, workforce development resources, and customized labor market information for career seekers, businesses, and workforce staff and partners. The site supports the CareerForce mission to facilitate thriving career solutions for individuals, employers, communities, and Minnesota, promoting equitable access to prosperity for all. With a CareerForceMN account, users can set career goals; like, save, and share content; and initiate CareerForce Connections.

Governor's Workforce Development Board (GWDB)

GWDB continues to focus on addressing the workforce shortage with emphasis on interagency coordination and equitable system as reflected in the proposed 2024-2027 WIOA State Plan Goals:

- Increase interagency coordination and alignment around shared goals, maximizing efficiency and coordination of workforce funding and programs and improving system integration, and creating a "no wrong door" approach for individuals or employers engaging in the workforce system.
- Build employer-led industry-sector partnerships across the state to create or expand responsive and equitable workforce development programs and career pathways with embedded work-based learning (WBL) or on-the-job training, including Registered Apprenticeships, focused on closing gaps in participation and representation based on race, ethnicity, disability, gender, veteran status, and age.
- Create a more inclusive, equitable, accessible, and proactive workforce system
 to serve all Minnesotans, preparing employers and the current and emerging
 workforce for the changing nature of work including new and emerging
 technology, changing labor market demands, and for the state's shifting
 demographics, including our new Minnesotans.

Workforce Development Scholarships

The Minnesota Legislature continues to fund Workforce Development Scholarships for students enrolled in high-demand educational programs leading to employment in six industries – advanced manufacturing, agriculture, health care, information technology, early childhood education, and transportation. The scholarships are available to new students entering associate degree, diploma, or certificate programs at any of the 26 Minnesota State community and technical colleges or to students completing two terms and transferring to an eligible program at one of the seven Minnesota State Universities. The scholarships cover approximately half the cost of tuition and fees for the required credits. The State Higher Education Bill (HF 2073) passed during the 2023 legislative session

continues funding for these scholarships and adds construction, education, and public safety to the list of eligible programs.

Data from the most recent reporting year (Workforce Development Scholarship Report to Legislature – February 2023):

- In the 2021 2022 academic year, 1,955 students (1,918 college students and 37 university students) received a Workforce Development Scholarship for an award total of \$3,921,997.
- In Fall 2022, 1,149 college students received a first-year award for a total of \$1,440,039 and 283 college students received a second-year award (\$352,750). Twenty-nine university students received a scholarship (\$36,250) for a total of 1,461 scholarship students in fall 2022.
- In the 2021 2022 academic year, students receiving Workforce Development Scholarships were enrolled in the following program areas:
 - Healthcare Services 48 percent
 - Advanced Manufacturing 13 percent
 - Transportation 12 percent
 - Information Technology 11 percent
 - o Early Childhood 6 percent
 - o Agriculture 4 percent
 - Other technical/liberal arts percent 6 percent

Workforce Development Scholarship Recipients: Degrees Awarded by Industry and Fiscal Year*					
Industry	FY 19	FY 20	FY 21	FY 22	Total by Industry
Advanced Manufacturing	11	110	243	284	648
Agriculture	1	18	40	57	116
Construction	-	-	-	6	6
Early Childhood Education	-	5	26	79	110
Health Care Services	7	137	398	633	1,175
Information Technology	-	30	108	163	301
Law Enforcement	-	-	-	1	1
Transportation	-	15	138	192	345
Total	19	315	953	1,415	2,702

^{*}Workforce Development Scholarship Report to Legislature – February 2020, 2021, 2022, and 2023

DEED Training Grant Programs

The Minnesota Jobs Skills Partnership (MJSP) provides short-term training for long-term employment and offsets training-related expenses. Grants include the Partnership Program, which provides up to \$400,000 to educational institutions that partner with businesses to develop job training or retraining for existing employees, the Job Training Incentive Program which provides up to \$200,000 to new or expanding businesses, and the Pathways Program that provides grants of up to \$400,000 to educational institutions or nonprofit organizations

that partner with businesses to provide training, new jobs, and career paths for low-income people.

Dual Training Grant

In support of the implementation of the Minnesota Dual-Training Pipeline administered by the MN Department of Labor and Industry (DLI), the 2015 Minnesota Legislature established the Dual Training Grant administered by the MN Office of Higher Education (OHE). The Dual Training Grant (Minnesota Statutes 136A.246) is a funding source that generates collaborative and strategic educational solutions between employers and related-instruction providers across Minnesota in the industries of advanced manufacturing, agriculture, healthcare services, and information technology. It pairs on-the-job training with related instruction to generate a comprehensive platform for learning. Employers, or organizations of employers, may apply for grants to reimburse expenses related to instruction toward attaining an industry-recognized degree, certificate, or credential for their employees.

Concurrent Enrollment

- The Office of Higher Education administers the Concurrent Enrollment Grant Program to develop new concurrent enrollment courses and expand existing concurrent programs. Concurrent enrollment courses are college courses taught in high school by qualified high school teachers during the regular school day and offered through a partnership between a high school and a college or university. The grant program was established by the 2015 Minnesota Legislature. The most recent 2023 higher education omnibus bill continues to fund the grant program with \$340,000 each year of the 2024-2025 biennium to support the development of new concurrent enrollment courses in career and technical education.
- The **Minnesota Department of Education** administers the following grant programs related to concurrent enrollment:
 - Expanded Concurrent Enrollment Grants: This grant program provides funding for the development or expansion of concurrent enrollment courses that encourage secondary school students, especially American Indian and students of color, to pursue teaching careers by developing and offering dual-credit postsecondary course options in schools for "Introduction to Teaching" or "Introduction to Education" courses consistent with Minnesota Statutes 2022, section 124D.09, subdivision 10. This program was established by the 2017 Minnesota Legislature and continues to be funded with \$475,000 each year of the 2024-2025 biennium.
 - Statewide Concurrent Enrollment Teacher Training Program: This is a single-source grant for the concurrent enrollment teacher partnership under
 <u>Minnesota Statutes, section 122A.76</u>. \$375,000 is available each year of the

 2024-2025 biennium for the development and implementation of a continuing

- education program to allow eligible teachers to attain the requisite graduate credits necessary to be qualified to teach concurrent enrollment courses.
- Expansion of Rigorous Course Opportunities and Support Grants: In 2022, \$3.6 million in federal funding was provided for a three-year grant program through CFDA 84.425U, ARP Elementary and Secondary School Emergency Relief (ARP ESSER) Funds to expand access to rigorous course opportunities for students of color, indigenous students, and students with a disability, as well as students in greater Minnesota to prepare and train for career or college. These rigorous courses included: Advanced Placement (AP), International Baccalaureate (IB), and courses provided through Postsecondary Enrollment Options (PSEO), including Early Middle College and Concurrent Enrollment programs that provide Career Technical Education coursework and/or career pathway opportunities.

Get Ready Program

Get Ready helps students from low-income backgrounds, indigenous communities, and communities of color realize their aspirations through education and career advancement. Get Ready operates in middle and high schools across multiple districts in Minnesota. Get Ready is funded primarily by the U.S. Department of Education through a federal GEAR UP grant (Gaining Early Awareness and Readiness for Undergraduate Programs). The Minnesota Office of Higher Education administers the Program. The federal GEAR UP program has two objectives: 1) student graduation from high school, and 2) student transition into college (including all types of postsecondary institutions) upon high school graduation.

Minnesota State Scholarships

The 2023 legislature established two significant scholarship programs in the Higher Education Bill to increase students' access to postsecondary education. The North Star Promise provides free tuition to students attending a public higher education institution or tribal college. Students with a family-adjusted gross income below \$80,000 are eligible. The Minnesota American Indian Scholarships include \$8.5 million each year of the 2024-2025 biennium to provide a first-dollar tuition and fee-free pathway for eligible Minnesota American Indian students to complete an undergraduate education.

Support for Teachers

Several grants were included in the 2023 Minnesota Higher Education Bill to support teachers with funding available for underrepresented teacher candidates, student teaching stipends for low-income students teaching in a license shortage area or rural school district, and teacher loan repayment for teachers who teach in a rural district or license shortage area.

The 2023 K-12 Education Bill included funding focused on recruiting, retaining, and diversifying the teacher workforce. The Minnesota Indian Teacher Training Program (MITTP) Grant provides funding (scholarships or stipends) to assist American Indians in becoming teachers. The bill also appropriated funding for a grant to Black Men Teach to establish

partnerships with public elementary schools with the goal of increasing the number of black male teachers to 20% of the teachers at each school site. Finally, grant funding supports Grow Your Own – Teacher Diversity to develop programs that encourage secondary school students, especially students of color and American Indian students, to pursue teaching, allowing funding for PSEO courses for "Introduction to Teaching" or "Introduction to Education."

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 in 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)

Preparing people for career and life success and meeting the skilled workforce needs of the state requires a close connection among the entities that recruit, support, educate, train, and develop youth and adults. It means ensuring that all individuals possess the knowledge and skills to enter the workforce and have options for strengthening these capabilities over the course of their careers. This preparation and support requires a network of educators, employers, and service providers to make up a local, regional, and state-wide network.

Formulated as part of the transition year's work, Minnesota developed specific statements to guide the Perkins V work. The established vision, mission, and principles for CTE in Minnesota continue to align with the State's WIOA strategic vision, goals, and strategies, underscoring the partnership between the state agencies in this workforce development space. Agency collaboration under the Minnesota Employment First Policy (E1MN) further supports efforts to prepare a skilled workforce including all Minnesotans.

Below are the vision, mission, principles, and strategic directions for the Minnesota Perkins plan:

Our Vision: Advancing career and technical education empowers every learner to realize a rewarding career.

Our Mission: Quality career and technical education ensures every learner has equitable access to career-connected learning through a network of knowledgeable partners.

Our Principles: We are committed to ensuring:

- An equity lens for all decision-making
- Inclusion of all stakeholders
- Being bold, innovative, and focused on continuous improvement

Responsiveness to the evolving labor market

The five strategic directions developed by Minnesota State, the Minnesota Department of Education, and the entire planning team validated and guided the work of the Perkins V plan. The Strategic Directions are the following:

Advancing Career and Technical Education

- Comprehensive Needs Assessment
- Accountability
- Outreach
- Awareness and Communication

Career-Connected Learning

- Career pathways
 - Programs of study
- Career preparation
 - Work-based learning (WBL)

Integrated Network

- Business and industry
- State and federal programs; state agencies
- Educational partners
- Consortia/Minnesota State/Minnesota Department of Education

Equity and Inclusion

- Service partnerships
- Providing resources
- Data/data management

Knowledgeable Experts

- Professional development/technical assistance
- Licensure preparation programs
- Mentor/mentee relationships
- Consortia leadership

Our Minnesota focus is on increasing student success by:

- Providing high-quality programs of study connected to high-skill, high-wage, in-demand careers
- Increasing the focus on service to special populations, including the use of statewide Perkins leadership funds and an expansion of community partnerships
- Requiring data-informed decision-making regarding local programs, services, and spending

- Supporting local innovation and program of study improvement through increased reserve funding
- Providing focus and support to recruiting, training, and retaining educational professionals

Preparing students for post-high school graduation opportunities has long been the priority of school districts across the nation; however, the past few decades have generally aimed at "college for all," with the assumption that "college" means a four-year degree. Our reality is now driven by global economic needs and the challenge to meet domestic and global workforce demands for jobs that require a combination of academic knowledge and technical skills. Of the careers requiring some type of education, a significant number of them are now requiring a two-year technical degree and/or credential or certification. Additionally, occupations need a workforce of life-long learners to stay up to date with technology and career area knowledge changes. Current trends are breaking down the silos in which education and workforce sectors often operate, thus leading the Minnesota Department of Education (MDE) to strengthen support to schools and districts in creating the World's Best Workforce (WBWF) to ensure that school districts and charter schools in Minnesota enhance student achievement through teaching and learning supports.

MDE has identified the skills and accountability measures of the WBWF, Every Student Succeeds Act (ESSA), and Career and Technical Education (CTE) and crafted a new vision for career and college readiness with due emphasis on career readiness domains and competencies. This vision has guided the continued implementation of the <u>Minnesota Career and College Readiness (CCR) Resource Guide</u> for schools, students, and partners to use while supporting student learning. Embracing a well-rounded view of education is necessary to drive educational and workforce goals and policies. Taking many perspectives into consideration, MDE developed a holistic vision of career and college readiness:

A sufficiently prepared student is one who has the knowledge, skills, mindset, and experiences in the academic, workplace, and personal/social domains to keep learning and, beyond secondary school, to successfully navigate toward and adapt to an economically viable career.

To prepare an educated and skilled workforce, including special populations, and to meet the skilled workforce needs of employers, including both existing and emerging in-demand industry sectors and occupations as identified by the state, the CCR Resource is one resource to guide schools and districts through holistic school or district program planning decisions. It can be used either as a systematic guide or as individual pieces that best fit with the current phase of planning or improvement efforts. Four domains and competencies represent Minnesota's vision of career and college readiness: Employability Skills, Mindsets and Social Awareness, Career Development, and Transitional Knowledge.

MDE is committed to establishing coherence between Perkins, the state CTE Vision, the state CCR Vision, WBWF, and ESSA. For example, one can view the "big picture" of preparing all students for education, training, and careers and where the secondary Perkins performance indicators fit within the identified CCR Resource. Career readiness indicators are measured in the secondary system. All the measures are grounded in the commitment and subsequent measures of equity access, participation, representation, and outcomes for all students.

In summary, Minnesota State and MDE recruit and prepare students in CTE through a progression of educational opportunities for students, teachers, and support staff. The progression aligns with the goals of Perkins V to utilize the CLNA in developing local or regional workforce strategies; supporting the recruitment, preparation, retention, and training of educational professionals; and providing incentives for innovation and improvement of POS. These provisions align with the recognition that rural consortia and consortia with high numbers of CTE students may need additional support to meet the state-determined performance indicators and provide equity of access for all students.

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)

As a partner with Minnesota's Combined State Workforce Innovation and Opportunity Act (WIOA) plan, CTE is actively engaged in workforce development planning, coordination, and alignment activities with leadership from both Minnesota State and MDE, partnering with the Governor's Workforce Development Board (GWDB). The GWDB is responsible for advising the Governor on Minnesota's workforce system and represents key leaders from business, education, labor, community-based organizations, and government. The GWDB has a statutory responsibility under WIOA, which provides leadership on opportunities and key workforce strategies for the state. The GWBD provides a venue to build a shared vision and mission. The GWDB is mandated and funded by WIOA and further defined by Minn. Stat., Sect. 116L.665.

In addition, state staff contribute to a variety of workforce initiatives and groups. At the regional and local levels, there is cross-planning, alignment, and coordination with Perkins leadership serving on workforce boards and regional workforce personnel serving on the Perkins leadership teams. These relationships are essential to effective and authentic work in completing the comprehensive local needs assessments. As a strong, local-control state, local or regional work is necessary to achieve the core programs and elements related to the system alignment described in Perkins V and WIOA.

MDE's Adult Education (ABE) Team oversees services to learners not in the K12 education system to provide English language instruction, diploma options, and postsecondary and career preparation. Many Minnesota two-year colleges are partners with ABE providers with programming and support to help adult learners transition into CTE programs upon attainment of their diploma (high school or high school equivalency). Many Adult Education graduates continue their postsecondary education in CTE programs available at postsecondary institutions.

Perkins V reinforces Minnesota State's and MDE's shared common efforts when it comes to engaging with the Governor's Workforce Development Board (GWDB) and other partners to prepare learners to successfully transition to employment or postsecondary opportunities. The Perkins V initiative, along with other partners, including industry associations and business collations such as chambers of commerce and Minnesota State's Centers of Excellence, engage business and industry for work-based learning (WBL) opportunities, participate in and expand sector partnership efforts championed by business and industry, assist with the design of career pathways, and support collaboration with business and industry to increase opportunities for industry-recognized credentials. The shared interests and overlapping goals between CTE and ESSA ensure that the two federally funded programs share responsibility for secondary student success. Additionally, Perkins V and WIOA share the goal of recognized postsecondary credential attainment for learners.

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)

Minnesota will use leadership funds to support initiatives and activities aligned with our strategic directions and the key elements identified in the CLNA that drive Minnesota's local application plans. Our approach builds upon successful practices established in previous CTE state plan initiatives, while also embracing the general authority granted by Perkins V. These state leadership activities are designed to meet the requirements stipulated by Perkins V. Activities include:

 Offering technical assistance and professional development to eligible recipients in the implementation of Perkins V plans tailored to their unique needs. This is achieved through monthly webinars and scheduled visits – either virtual or in-person – conducted by a dedicated team of secondary and postsecondary state staff.

- Providing incentive grants to eligible recipients utilizing effective practices in preparing non-traditional and special populations students for careers that are high-skill, highwage, and in-demand. Recipients are asked to share promising practices at the CTE Works! state-wide conference and other professional development events.
- Distributing funds through a Request for Proposal (RFP) process aimed at delivering CTE programming within state-run institutions, such as juvenile justice facilities and correctional institutions. Recipients are asked to share promising practices at the CTE Works! state-wide conference and other professional development events.
- Convening the annual statewide *CTE Works! Summit*, a high-priority professional development activity bringing together leaders and educators across the full spectrum of education, workforce, industry, and community organizations. This conference stands as a cornerstone event, emphasizing the exchange of innovative ideas, best practices, and fostering growth and excellence in education and industry alike.
- Targeting technical assistance to local Perkins consortia through a statewide Perkins leaders meeting. This annual event focuses on changes to federal and state legislative efforts providing professional development and technical assistance to Perkins coordinators who are responsible for the administration and implementation of the Perkins federal grant.
- Funding initiatives for the recruitment, preparation, and retention of career and technical education teachers, faculty, specialized instructional support personnel, or paraprofessionals.
- Creating more opportunities for secondary teachers to meet licensure requirements for programs within CTE, including work-based learning.
- Supporting training for state staff on federal requirements, best practices, and skill development to effectively support sub-award recipients.
- Providing state staff time to continuously improve Minnesota Perkins operations, forms, and processes.
- Providing statewide grant management and distribution of funds.

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)

Minnesota's Perkins V Plan was built on the solid foundation of a development and review process implemented through Perkins IV. Minnesota established a collaborative system in the state's high school and college career and technical education programs. The current system is organized into 23 local consortia. The consortium model brings together secondary teachers and postsecondary faculty and staff, along with business and industry partners, to guide the development, implementation, and continuous improvement of programs of study. Perkins V is an opportunity for our collaborative system to continue ensuring open communication lines between secondary and postsecondary institutions, as well as balancing the labor market needs of the community, region, and State.

The diversity of Minnesota's economy is a success story. Analysis of current economic growth points to strengths across several sectors—from national competitiveness in agriculture and manufacturing to impressive growth in healthcare and professional business services. Minnesota's resilient economy provides momentum for continued support of career and technical education programs including programs of study in all 16 career clusters. The framework for this continued work includes:

- Marketing
- Business, Management and Administration
- Hospitality and Tourism
- Finance
- Agriculture, Food, and Natural Resources
- Arts, Audio/Video Technology, and Communication
- Information Technology
- Transportation, Distribution, and Logistics
- Architecture and construction
- Manufacturing
- Science, Technology, Engineering and Mathematics
- Health Science
- Education and Training
- Human Services
- Government and Public Administration

Law, Public Safety, Corrections and Security.

The comprehensive local needs assessment assists the local consortium in the prioritization and validation of the economic cluster and related programs of study that meet local or regional needs. These plans will be based on data-driven decisions made with their local and regional partners.

Minnesota has defined a program of study (POS) as a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary levels that:

- incorporates challenging state academic standards,
- includes both academic and technical knowledge and skills that are aligned with stateapproved frameworks including employability skills,
- is aligned with local and regional needs of current and emerging occupations,
- progresses in specificity (beginning with all aspects of an industry or career cluster) and leads to more occupation-specific instruction,
- has multiple entry and exit points that incorporate credentialing, and
- culminates in the attainment of a recognized postsecondary credential.

Support for the development and implementation of programs of study at the local consortium level is provided through state-approved frameworks, career and college readiness resources, work-based learning (WBL) guides, and intentional professional development with teachers, faculty, and Perkins leadership. In addition, individual technical assistance is provided by state staff of Minnesota State and Minnesota Department of Education. Teachers and faculty review programs to ensure industry-aligned competencies and certifications.

- 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 132 will—
 - promote continuous improvement in academic achievement and technical skill attainment;
 - ii. expand access to career and technical education for special populations; and
 - iii. support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V)

Minnesota's school districts and the two-year colleges of Minnesota State were self-formed into Perkins consortia under Perkins IV to promote collaborative planning and implementation

of Career and Technical education programs within their regions. The consortium model supports broader engagement within a region as decisions are made to determine which programs of study would best address the workforce needs of the communities.

In identifying initial membership in the State's Perkins consortia, career and technical education leaders were asked to consider the following for their region of the state:

- Career and Technical Education program improvement
- Anticipated programs of study
- Dual and concurrent enrollment opportunities
- Collaborative history and culture
- High school to college matriculation patterns
- Geographic proximity
- Continuation of effective collaborative activities that promote high school to college transition
- A decision-making model that would equitably and effectively address career and technical education programming.

As the state continues to implement the *Strengthening Career and Technical Education in the 21st Century Act* (Perkins V), the consortium model will be the system of delivery for quality career and technical education including addressing workforce development needs and education goals by approving and assessing quality programs of study.

i. promote continuous improvement in academic achievement and technical skill attainment;

Initially, Minnesota formed five work groups aligned with the strategic directions to guide our implementation of Perkins V: Advancing CTE, Career-Connected Learning, Integrated Network, Equity and Inclusion, and Knowledgeable Experts. The purpose of the Career-Connected Learning work group was to provide recommendations and decisions that re-set/guided the state in career pathway development from career exploration to employment. Career Connected Learning provided context to core academics through integrated, applied and experiential learning with exposure to career and technical education and a balanced secondary and postsecondary experience. One of the goals of the group included the development of a checklist and two rubrics that defined the minimum criteria for state-recognized programs of study, the second identified strengths or potential opportunities in their state-recognized programs of study, and the third provided measures for continuous improvement for all programs of study. The minimum criteria rubric advanced and refined the previous Rigorous Program of Study checklist that Minnesota implemented in 2012, the MDE program approval guidelines, and the quality standards from the research of national organizations including Advance CTE.

The elements of the rubric (*State-Recognized Programs of Study Guide* on the <u>Public Comment</u>
Notice webpage) to meet the minimum standard for a state-recognized CTE program of study

include the following:

 Course standards accurately align to the academic, technical, and employability skills learners must master for entry and success in a given career pathway: Content standards, frameworks and competencies define what students are expected to know and be able to do to enter and advance in college and/or careers comprise the foundation of a POS.

- 2. Program of study incorporates active involvement from an integrated network of partners: Ongoing relationships among education, business, and diverse community partners bolster POS design, implementation, evaluation and maintenance.
- 3. Secondary program(s) meets MDE program approval requirements and incorporates courses that lead to postsecondary credits/credentials: Secondary programs have appropriately licensed teachers and advisory committees, develop and ensure access to equitable student leadership opportunities, and provide career exploration activities leading to postsecondary credits/credentials.
- 4. Postsecondary academic program meets Minnesota State Board policy and Higher Learning Commission requirements: A cohesive arrangement of college-level for-credit courses and experiences, designed to accomplish predetermined objectives, lead to the awarding of a degree, diploma, or certificate.
- 5. **Materials, Equipment and Resources**: Facilities, equipment, technology and materials used in the program of study reflect current workplace, industry and/or occupational standards and practices for installation, use, maintenance, and safety.
- Incorporates authentic work experiences at the secondary and/or postsecondary level
 that are valued by industry: POS engage students in authentic work-based learning
 experiences that demonstrate progressive occupational learning aligned to industry
 workforce needs.
- 7. Program of Study development, improvement and advocacy are supported by findings from a comprehensive local needs assessment: Systems and strategies for gathering, analyzing, and disseminating needs assessment data are effective for guiding the improvement of POS, and available in plain language to promote POS.

A consortium has a minimum requirement of six state-recognized programs of study. The process for approval of CTE programs of study begins with secondary program approval by the Minnesota Department of Education (MDE). Approved secondary programs are then reviewed by MDE on a 5-year revolving schedule. At the postsecondary level, initial program approval for new CTE college programs is completed by the Minnesota State System Office. Follow-up program review is conducted at the campus level according to Minnesota State and college policies and procedures according to accreditation standards. All consortia submit their programs of study for review on an annual basis as part of the local application for funding. The continuous improvement efforts of the local consortia are documented using the *POS Continuous Improvement Rubric*.

Postsecondary

Minnesota State program approval policy:

Board of Trustee Policy 3.36 Academic Programs

Part 6. Academic Program Approval

Approval of the chancellor is required for new academic programs, changes to existing academic programs, suspension of academic programs, and closure of academic programs at system colleges and universities.

An approved academic program shall include curricular requirements for earning an academic award, such as credits in general education, a major and/or minor, and all prerequisite courses. The Minnesota State system office shall maintain the academic program inventory and the Office of the Chancellor shall annually report to the Board of Trustees on the status of the inventory. The annual report to the Board will include data and analysis of programs measured against program goals established by the Office of the Chancellor. The goals will be based on aligning program offerings to workforce needs statewide, regionally, and locally in collaboration with the Department of Employment and Economic Development (DEED) and the Governor's Workforce Development Board (GWDB), including data from the state demographer. Only academic programs approved by the chancellor as recorded in the academic program inventory may be offered by Minnesota State colleges and universities.

Secondary

Minnesota Department of Education Program Approval

Districts, intermediates, cooperatives, and charter schools submit a program approval form to the Minnesota Department of Education (MDE) if they are:

- Applying for a new program.
- Making updates to an existing program.
- Districts up for five-year renewal.

The programs and courses listed within a district's program approval database are the programs and courses that will be reported to MDE in the P-file (Perkins data submission). All programs are subject to program review conducted by the Minnesota Department of Education on a five-year cycle.

ii. expand access to career and technical education for special populations;

The Perkins V strategies to meet the challenges of our special populations come from the analysis at the local or regional level derived from the CLNA and performance gap data. Local consortia are required to document and evaluate how their intentional activities expand access to career and technical education (CTE) for special populations as identified in the comprehensive local needs assessment. The state continues to provide professional development to consortia as defined by the *Strengthening Career and Technical Education for the 21st Century Act*, consortia data review and analysis, applicable national research projects, and recommendations for interventions.

A newly launched <u>Equity Scorecard</u> developed by the Minnesota State Office of Equity and Inclusion and the Institutional Research Team helps to understand the size and scope of inequities across our campuses and system using key performance indicators. The Equity Scorecard provides another lens to understand the disparities in student success and other key performance indicators that may be aligned to the Perkins CTE performance indicators. This tool has the potential to be leveraged with CTE data to identify action steps that support the success of our underrepresented CTE students by recognizing institutional factors.

The State will continue to support set-aside funding for services to corrections and disabilities for youth and adult populations through competitive community grants and collaborative efforts. These efforts should increase and strengthen partnerships that:

- ensure equitable support for learners to access and persist in training and job preparation;
- foster collaboration for access, equity, and inclusiveness for youth and adult learners with disabilities or those who are justice-involved across agencies and community partners;
- share practices and scale initiatives that address challenges in education and work readiness of those individuals served;
- expand the diversification of collaboration with educators, counselors, coaches, and community service providers that help prepare individuals from marginalized communities for employment and postsecondary career and technical education (CTE).

A component of providing *access for all* to programs is the Office of Civil Rights compliance requirements. Minnesota has demonstrated a long-standing commitment to equity and ensuring that members of special populations are provided equal access to programs. Each year Minnesota State conducts a minimum of four Office of Civil Rights (OCR) compliance reviews. The major purposes of the OCR Compliance Reviews are to ensure that community colleges are providing equal access to CTE through vigorous enforcement of Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Vocational Rehabilitation Act of 1973, and Title II of The Americans with Disabilities Act (ADA). In addition to conducting a minimum of four local OCR On-Site Compliance Reviews each year, Minnesota State provides ongoing technical assistance to community college staff members on equal access.

The Minnesota Department of Education is required to submit to the United States Department of Education, Office for Civil Rights (OCR), a Biennial Civil Rights Compliance Report. It is MDE's responsibility to conduct comprehensive on-site reviews of school districts to address issues of discrimination on the basis of race, color, national origin, sex and disability in vocational education programs. Specialists with the Compliance and Assistance Division within the Minnesota Department of Education will review Minnesota school districts on a cyclic time frame.

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

Employability skills are a required component of curriculum and instruction in all career and technical programs, and are addressed and validated through the inclusion of work-based learning (WBL) experiences within programs of study and career pathways and all aspects of MDE's Career and College Readiness work.

WBL provides students the opportunity to become engaged with occupations, employers, and career pathways. There is significant importance for both secondary and postsecondary students to participate in WBL opportunities. The experience gives students a first-hand look into prospective or chosen careers as well as experience in developing employability skills. Students can participate in career exploration to full immersion either in or outside of the traditional school setting. This rich experience for students helps guide them to well-suited career choices. The state supports the local consortium's implementation of WBL in the programs of study. One of the minimum requirements for state-recognized program of study recognition by the state is the inclusion of a WBL opportunity for students. The state supports WBL at the consortium level by providing funding to the consortium to both develop and improve these opportunities for students and provide for professional development and technical assistance.

Opportunities to build career awareness, explore careers, and develop employability, critical thinking and problem-solving skills are provided through work-based learning (WBL) experiences. Local consortia have a range of WBL strategies in programs of study, including simulation, portfolio development, and capstones or employer-aligned experiences such as industry speakers and tours, job shadows, internships, project work, or field experience. WBL is an instructional strategy within the continuum of experiential learning (p. 8, Work-Based Learning Handbook), which involves an appropriately licensed teacher through the Minnesota Professional Educator Licensing and Standards Board (PELSB), who closely supervises the worksite activities, convenes an advisory committee, and is responsible for the required training plan, training agreement, safety training, seminar course, evaluation of student competencies, and recordkeeping.

The work-based learning (WBL) experience is connected to CTE coursework within a career pathway and the career and technical student organizations (when available) of the career pathway, including, but not exclusively, the WBL career seminar. Training plans for a particular work experience detail the scope and sequence of occupational competencies and employability skills for entering an occupation or postsecondary education. If a student completes multiple work experiences, the training plan should include a progression of acquisition of higher-level competencies. Each student participating in an industry-aligned WBL opportunity must have a training plan developed in collaboration with the WBL coordinator, student, and the employer with competencies identified by the team. These identified competencies must match proposed deliverables/outcomes specified in the training agreement

for an identified employment opportunity. Training plans are required to be kept on file at the local school district and be available for review upon request.

This array of opportunities provides Minnesota students with strategies to become career-ready. Students with disabilities have opportunities to participate in WBL, however, there may be times when students with disabilities will require specially designed instruction to meet their educational needs. If an Individualized Education Program (IEP) team determines that is an appropriate service, the district may access additional state funding to modify curriculum and purchase special equipment for students with disabilities enrolled in a WBL program. To be eligible for this funding a district must have an approved Access to Career and Technical Education-Special Education (ACTE-SPED) WBL program. WBL experiences provide students with opportunities to explore careers, build career awareness and employability skills, and develop critical thinking and problem-solving skills.

Minnesota has codified employability skills within its definition of career and college readiness. Career and college readiness is defined by Minnesota Statutes, section 120B.30, as:

For purposes of statewide accountability, 'career and college ready' means a high school graduate has the knowledge, skills, and competencies to successfully pursue a career pathway, including postsecondary credit leading to a degree, diploma, certificate, or industry-recognized credential and employment. Students who are career and college ready are able to successfully complete credit-bearing coursework at a two- or four-year college or university or other credit bearing postsecondary program without need for remediation.

c. Describe how the eligible agency will—

- 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;
- 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;
- iii. 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;
- ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;
- 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;
- 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
- 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)

i. Availability of Career Pathways Information

At the state level, career pathway inventories are available through MN Programs of Study website with information on college credit options, career exploration resources, and the full listing of programs of study by high school, college, career, or pathway. The pathways can be sorted by any of the listed fields. Consortia make more in-depth, local career pathway information available to students, parents, teachers, and faculty.

ii. Career Pathway Multiple Entry and Exit Points

The state is committed to providing support to local consortia and partners to build career pathways that demonstrate the opportunity for multiple entry and exit points. The availability of multiple entry and exit points provides the opportunity for students to enter a career pathway at various stages in their educational experience. The state does not have the authority to mandate to colleges or high schools the structure of the programs and the creation of degree options. However, the state does collectively encourage programs to structure credential attainment in a stackable format. This allows students to enter and stop-out at various life points without losing previously obtained experience and provides opportunities for students to gain both experience in the industry and educational experiences. This includes the ability of singular institutions to offer only portions of a program because of limited physical or human resources. The state encourages collaboration and partnerships between educational institutions to provide credential attainment in a variety of ways and encourages institutions to honor transfers, articulations, dual enrollment agreements, and award credits for prior learning experiences, or competency-based education.

Some circumstances are beyond the control of the CTE units and are governed by other regulatory agencies such as regional accreditation (HLC), state statute, or board of trustee policy. Programs of study provide students with opportunities to stack their credentials and earn credits for prior educational or work experiences. This may be a degree completion or preparation for completion of an industry-recognized credential or re-certification. Institutions are developing programs that have smaller parsed courses that allow students to enroll in courses (or parts) that are needed to complete credentials without having to "re-enroll" and participate in programs that are not needed because of experience or educational completions.

The state reviews all state-recognized programs of study and provides technical assistance to re-design programs to include multiple entry and exit points. The Continuous Improvement Rubric for "program quality" is aligned with Minnesota State, MDE, and the program approval process for schools to self-evaluate the quality of their programs and programs of study in their school districts (not a state evaluation tool). One of the metrics in this tool is to review the multiple entry and exit points. There are many efforts throughout Minnesota State to enhance the entry and exit points in career pathways for various populations such as veterans and exoffenders.

Minnesota requires consortium formation between secondary and postsecondary. This obligates partners to collaborate on the development of a joint local Perkins application. This application details how each consortium will use funds to develop, coordinate, and implement CTE programs and programs of study. This requirement by the state has been a successful tool in having eligible recipients work together to leverage resources. Efforts to coordinate and improve state-recognized programs of study include consortia collaboration with secondary, postsecondary, <u>Adult Basic Education</u> (ABE), and workforce agencies. The state supports application and plan development by monitoring and providing feedback on each local plan. In addition, the annual Perkins leadership meetings are designed to support local consortium coordinators with time to network and share learning. Professional development includes sessions on fiscal collaboration with other revenue streams and partners.

The alignment of secondary and postsecondary professional development provides an opportunity to merge work around multiple entry and exit points. For instance, state-recognized programs of study are designed to move students through secondary and postsecondary courses in a particular industry. Although this is a good model, it limits access for adult learners, dislocated workers, and others. The only entry point they have is postsecondary and, unfortunately, too many end up in developmental education instead of postsecondary coursework.

A recent federal law, <u>Ability to Benefit</u> (ATB), allows individuals who don't have a high school diploma, GED, or equivalent to receive federal grants, loans, and work-study funding to help pay for college. Minnesota State was approved in August 2022 to begin implementing this program. Seven Minnesota State colleges and universities now participate in creating greater access to higher education in career and technical education pathways for adult learners who find themselves without a high school diploma or equivalent.

iii. Labor Market Data

Each consortium is required to conduct local and regional needs assessments throughout the state on a biennial basis. The state utilizes the data collected from local and regional needs assessment to influence conversation at regional levels. This provides some data required to make informed decisions about state-recognized programs of study. The state also has several resources to align state-recognized programs of study to local and regional labor market data. State staff developed a process for conducting an analysis of consortium programs of study. This analysis helps consortia determine which programs of study are offered throughout their region. Perkins state leadership conducts professional development for the consortium leaders and provides technical assistance to utilize a variety of labor market data resources to triangulate both quantitative and qualitative data to analyze what programs are vital to the region. Regional labor market data assists consortium leadership in determining how to support the programs that are deemed high-wage, high-skill, or in-demand and how to align programs to meet the needs of the local needs assessment. There are many resources and collaborations occurring throughout the state to address occupations that are deemed high-wage, high-skill, or in-demand. For example, manufacturing and health care continue to rise to the top as indemand careers in labor market data information. The state will continue supporting partnerships and collaboration between students, community, and employers in these fields.

Funding sources may be directed to consortia to examine and implement the use of current technology, equipment, or training aids that align directly to local, regional, state, and national standards within the economy. Consortium applications document how they have determined what these needs are and how they came to these conclusions with the support of advisory committees. Programs that do not meet the requirements for size, scope and quality may need to seek other sources of funds for equipment or materials to maintain programs.

iv. Equal Access to Approved CTE Programs

The State will continue to ensure equal access to approved career and technical education for all students with evidence-based practices proven to be successful in the state. Access to Career Technical Education-Special Education (ACTE-SPED) aid is available for contracted services and special equipment to enable students to access CTE courses. Information is disseminated to consortia so that they can continue to access this aid. The state collaborates with consortium leaders to identify best practices for educational program delivery to diverse populations across large geographic boundaries. This includes guidance for small institutions with limited economic means for delivering needed career and technical education programs because of factors that are beyond the state's ability to control.

Campus accessibility coordinators continue to be a resource for postsecondary transition and technical assistance for addressing the needs of students with disabilities. State and national partnerships that provide sources of technical assistance and professional development for postsecondary CTE leaders include: The Minnesota Institute for Community Integration, the

Minnesota Inclusive in Higher Education Consortium hosted by the University of Minnesota and Think College Career & Technical Assistance CTE Affinity group.

The availability of resources can be scarce in extremely rural regions. In addition, the diversity of career and technical programs offered in the consortia is vastly different. One of the elements of the local needs assessment reviews the issues of access to special populations. This provides regional data for the consortia to determine strategies on closing the gap associated with access and opportunities for students in special populations.

Equity gap analysis tools developed by NAPE and Advance CTE are shared with consortia to help identify gaps or barriers to special populations' access to career and technical education. Gap analysis allows the state and local consortia to determine strategic approaches to reducing or eliminating barriers to career and technical educational programming. The state will continue to provide incentive funding for consortia to improve access and opportunity to special populations and to those that have been able to improve and maintain proven career and technical programming and related activities.

The state encourages local consortia to establish stronger working relationships with community-based organizations and Adult Basic Education to expand career and technical opportunities to underserved populations as defined in the law. The state will continue to support consortium efforts to expand career and technical education offerings beyond the traditional school building. This includes distance delivery of education through various modalities and utilization of industry-supported facilities to eliminate one of the physical barriers. It is evident that many of the barriers to access are caused by the lack of career and technical education teacher licensure or credentialing opportunities. Multiple initiatives are in place to address CTE teacher shortages.

The state continues to fund support services for students with a variety of needs and provide opportunities for students of all abilities to participate in career and technical education wherever practical and applicable. Professional development for educators is provided to aid in the development of curriculum and programs to meet the needs of learners of all ability levels.

v. Local Workforce Development Boards

Local workforce development boards participate in all CTE work in Minnesota and the extent of the involvement is locally controlled. At a minimum, workforce development board members participate in the CLNA. The Minnesota Department of Employment and Economic Development (DEED) regional labor market analysts and career pathway counselors are active participants in this work. The Career Pathways Tool developed and hosted by DEED is utilized to connect educational programming with labor market data to help align educational outcomes with employment opportunities. This interactive tool provides access to statewide or regional exploration of career fields and cluster employment projections, the education demand in these occupations, and wage data. Local and regional relationships exist between the regional

career pathway specialists to assist in providing information for educational programming and career advisement for our learners.

Consortium members participate in career and technical education advisory boards. Workforce center personnel are also part of the local Perkins governance teams in many consortia. Correspondingly, many of our consortium leaders serve on their regional or local workforce development boards.

Minnesota State and Minnesota Department of Education have separate processes for developing and approving career and technical education programs and each state agency has the authority to approve or deny the application based on a variety of criteria. This process does not discriminate between career and technical education or general education programs. The state currently requires consortia to possess six state-recognized programs of study. The state does not dictate or mandate that certain consortia offer certain programs. The consortia determine which pathways are best suited to meet the needs of the students and the region. Secondary and postsecondary approval requires the engagement of a local advisory committee in the ongoing delivery of CTE programs. The state provides resources for programs to utilize in the creation of local advisory committees. Finally, labor market data is required to support the creation of postsecondary career pathways.

Once programs are completed and approved, the program is required to participate in a program review process. State-recognized programs of study are reviewed annually to ensure all the required components exist. The state also strongly encourages the participation in state career pathway collaborative meetings where secondary teachers, postsecondary faculty, and industry experts develop, edit, and approve competencies and assessments to validate the skills needed for entering graduates.

The state continues to review processes to improve the performance in the areas of career pathway development, program of study development, and local workforce board and education collaboration and partnership. In addition to these mentioned strategies, consortia throughout the state conduct local needs assessments and evaluate the findings. This process influences the decisions to add, improve, modify, or delete career pathways and/or state approved programs of study. It also influences postsecondary program modification through the involvement of established workforce boards.

As part of the development of a continuous improvement rubric, one metric includes evaluating the level of engagement by local workforce boards. The metric evaluates industry and workforce board involvement in the establishment and modifications of career pathways to meet local needs assessments and the needs of the local workforce development boards.

vi. All Aspects of Industry

The state places a strong emphasis on the incorporation of work-based learning (WBL), mentoring, internships, and simulated work environments into career pathways as part of

state-recognized programs of study. Many consortia have developed strong collaborations or partnerships with business and industry to provide experiential learning opportunities for students. Consortia provide opportunities for students to engage with business and industry on a variety of levels from exploration to employment in various stages of their education. Engagement with industry experts offers teachers and faculty the opportunity to learn alongside the students, including access to externships to learn more about relevant industry skills to teach students.

One of the metrics the state has examined is the incorporation of work-based learning (WBL) for students as a program quality indicator. This may include simulated work environments such as health care simulation laboratories or other simulated industry experiences. The state continues to investigate the impact of requiring that all identified state-recognized programs of study (which includes both the secondary and postsecondary levels) provide the opportunity for some form of WBL for students including youth apprenticeships, internships, co-operative experiences, clinical and practicum experiences, entrepreneurships, work simulations, or other forms of WBL. In addition, every state-recognized program of study already includes career exploration, preparation, and guidance provided by both educators and industry professionals. Several of the consortia are using Perkins funding to provide opportunities for rigorous, longterm, and sustained career exploration with hands-on experiences that are relevant and current in the industry. The state will continue to provide technical support and professional development for these types of WBL opportunities. In addition, Minnesota State, Minnesota Departments of Education, Employment and Economic Development, and Human Services partner to provide secondary schools with collaborative guidance to ensure that WBL experiences meet the requirements of WIOA, Olmstead and other labor laws. The state provides technical assistance, evidence-based practice, and resources on proven strategies for local school districts and colleges to implement more and create new WBL experiences for students.

vii. Improvements in Gaps of Performance

Secondary and postsecondary reports highlighting performance gaps are made available to local recipients to help prioritize needs in the CLNA and application process. Technical assistance is provided to help interpret performance data and develop strategies to improve outcomes and reduce performance gaps for CTE concentrators. In addition, the state prioritizes the use of reserve funds to address performance gaps.

The state continues to link CTE coursework to hands-on relevant work-based learning (WBL) experiences, using a scaffolded framework of employability skills development as part of the work experience seminar. The enhanced connection to WBL and development of employability skills have the potential to increase student retention, engagement, graduation rates and academic performance. Consortia continue to be encouraged to strengthen intentional connections to regional workforce development centers within consortia and local school districts to identify workforce skill training needs for all students/workers including special

population students. Programs of study are reviewed for their responsiveness to local needs assessments and delivered with fidelity to address workforce and workplace needs.

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)

Minnesota has been increasing postsecondary opportunities for students through multiple approaches and offers dual enrollment opportunities for students under the Postsecondary Education Options (PSEO) Act, which includes postsecondary courses taught at the college and/or at the high school through concurrent enrollment. By participating in these dual enrollment options, high school students complete both high school graduation requirements and college requirements that allow for greater flexibility when they enter the postsecondary setting full-time. Students may benefit from cost-savings and a shorter time to credential completion. State law and consortium regional articulation agreements support planning and funding early college opportunities and ease the transition from secondary to postsecondary.

Eligibility for secondary students to access PSEO on a college campus includes participation in postsecondary CTE programs for 10th, 11th, and 12th-grade students. Transcripts at the secondary and postsecondary levels document course completion. Tuition, fees, and books for PSEO students who earn dual credit are paid by the Minnesota Department of Education to the colleges and universities in which PSEO students are enrolled. The state also provides support to pay the cost of transportation for low-income students attending college courses on a postsecondary campus. In addition to financial provisions to support access to college course-taking opportunities for students, policy holds both institutional partners accountable for offering support services to students both prior to and during enrollment in the PSEO program.

The Minnesota Department of Education developed a <u>Postsecondary Enrollment Options</u> <u>Reference Guide</u>, updated November 2021, which provides definitions of postsecondary options, eligibility of students, and participation requirements including students with Individualized Education Programs (IEP). The guide also includes information for students, parents, districts, and postsecondary intuitions. The Minnesota Automated Reporting Student System (MARSS) collects enrollment and demographic student data using a unique student identification system. The system allows MDE to track student enrollment and postsecondary enrollment option participants.

Minnesota's concurrent enrollment partnerships offer thousands of Minnesota students access to rigorous college courses at their local high school. Research shows that high school students who participate in accelerated learning options, such as concurrent enrollment, benefit greatly from:

- Exposure to high expectations.
- Participation in challenging courses.
- The momentum gained by earning college credits while still in high school.

Minnesota's concurrent enrollment program has one of the most extensive policy structures in the country to support high school instructors teaching college courses. All concurrent enrollment programs must adopt and implement the National Alliance of Concurrent Enrollment Partnership's (NACEP) program standards and receive accreditation (Minn. Stat. 124D.091, Subd.1). Secondary and postsecondary institutions are required to sign a concurrent enrollment agreement that provides for the following assurances: determination of qualifications and responsibilities of high school instructors, postsecondary supports for instructors, resources needed to support teaching and learning, regular communication and professional development between postsecondary faculty and high school instructors, and approval of high school instructors to teach college courses by the college or university partner.

Partnerships developed between university faculty and high school teachers provide learning and training opportunities that may not otherwise exist. Additionally, concurrent enrollment students stay at the high school instead of leaving to attend classes at a university. This allows the student to continue their learning within their high school community and eliminates the transportation barrier that might be experienced if the student needs to travel to the local college. Finally, through participation in concurrent enrollment, high schools establish themselves as education leaders by setting high standards, providing outstanding offerings, and preparing students for the 21st century.

All twenty-six two-year colleges in the Minnesota State system participate in dual enrollment and offer these opportunities to high school students. In 2022, over 46,500 high school students gained over 448,000 college credits via dual enrollment, and participation in dual enrollment has grown by 62% since 2013. This statistic includes career and technical educational coursework.

Professional development is an essential part of successful dual enrollment activities. The Minnesota State system office provides a variety of professional development opportunities for internal staff and external partners specific to dual enrollment opportunities and requirements. Monthly webinars for campus concurrent enrollment directors include sharing best practices, providing policy guidance, and presenting information relevant to effective program implementation. Additionally, Minnesota's NACEP-affiliated chapter, Minnesota Concurrent Enrollment Partnerships (MnCEP), offers annual winter and summer conferences, providing opportunities to learn more about NACEP standards, how to implement them, and how to prepare a strong portfolio for accreditation.

For PSEO programming, where high school students take college courses on the college campus, bi-monthly PSEO Connect meetings and an annual summer convening provide professional development opportunities for college program coordinators and staff on the

specific program needs of this model. Technical assistance is provided as specialized support for PSEO programming with students enrolled in the state-approved alternative high schools.

Two major challenges persist with dual enrollment:

- 1. The barriers created by the misalignment of secondary teacher licensure requirements and postsecondary minimum qualifications in the same or similar content areas.
- 2. The recruitment and support of nonwhite students into dual enrollment opportunities.
 - e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local businesses (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)

The groups listed in Section 122(d)(12) of Perkins V continue to be engaged in the planning, development, implementation, and evaluation of career and technical education programs through the established CLNA process. In addition, one of the minimum requirements of state-recognized programs of study is to engage an integrated network of partners. These groups assist with identifying and prioritizing local needs in the CLNA process. Participating as members of secondary and postsecondary advisory committees, the groups assist in the development and continuous improvement of programs of study. All programs of study are published on the Minnesota State Programs of Study Search webpage to increase awareness of programs offered to members of the public.

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.

In compliance with section 134(b) of Perkins V, the local application template was developed for the original Perkins V Four-Year State Plan. The *Perkins V Local Application* template has been revised and updated based on user feedback. The final document will be submitted to OCTAE with the 2024 State Plan.

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.

To meet the requirements of section 134(c) of Perkins V the *Comprehensive Local Needs*Assessment Guide and Framework have been developed for the original Perkins V plan. Based on user feedback, the CLNA Framework has been revised and renamed as the CLNA Results and Priorities template. The final document will be submitted to OCTAE with the 2024 State Plan.

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.

For the implementation of this updated Perkins V plan, Minnesota has reviewed its criteria for defining consortia using the lens of size, scope, and quality. The consortium's configuration moving forward will need to meet the criteria below:

Criterion 1: Membership:

• Minimum of one school district plus one postsecondary Minnesota State College

Criterion 2: Programs of Study

- Minimum of 6 state-recognized programs of study
 - o Of these 6 POS, a minimum of 4 career fields must be represented
 - All components of 3 of the 4 POS by career field must be provided within the consortium

Criterion 3: Student Enrollment

- Greater than 1,000 CTE participants at the secondary level
- Greater than 1,800 FYE at the postsecondary level

The definitions and headcount used for participants and FYE are based on 2023 academic data.

Criterion 4: Consortium Allocation

- Federal legislation requires that no consortium receive less than \$50,000.
- If, by formula, a consortium would receive less than this amount, they would need to reconfigure their constituency to remain viable.

Minnesota defines size, scope, and quality at the program level as documented below. However, the state will continue to review and potentially revise these components as we collect information from the comprehensive local needs assessments.

Size

- Size is the most context-dependent variable, so specific numbers are not provided. This includes parameters/resources that affect whether the program can adequately address student-learning outcomes, such as:
 - Number of students within a program
 - Number of instructors/staff involved with the program
 - Number of courses within a program
 - Available resources for the program (space, equipment, supplies)

Scope

- Programs of study are part of or working toward inclusion within a clearly defined career pathway with multiple entry and exit points (minimum of 6 staterecognized programs of study offered within a consortium).
- Programs of study are aligned with local workforce needs and skills.
- Postsecondary programs connect with secondary career and technical education via articulation agreements and/or dual credit, etc.
- Programs develop not only specific work-based skills, but also broadly applicable employability skills.

Quality

- A program must meet two out of the following three criteria: the program develops (1) high-skilled individuals, (2) individuals who are competitive for highwage jobs, and (3) individuals who are trained for in-demand occupations.
 - High-skilled: programs that result in industry-recognized certificates, credentials, or degrees
 - High-wage: a high wage is anything that is above the median wage for all occupations (\$47,986 based on 2021 data from the Minnesota Department of Employment and Economic Development)
 - o In-demand: occupations identified in DEED's <u>Occupations in Demand</u> and/or through local needs assessment.
- A program or activity must work toward closing student equity gaps in access and completion (e.g., reducing barriers to students, implementing guided pathways, providing recruitment).
- A program must work toward effectively using data to inform and improve student learning.
- Approved programs meet the requirements of MDE or Minnesota State policies and rules.
- Implementation of a continuous program improvement process approved in the local application.
- Activities must support or be collaborations with POS.

Waivers to uses of funds that do not meet the size, scope, and quality criteria at the consortium or local level will be handled on an individual basis at the time of the local application review or as consortia make requests to change their original submissions.

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—
 - will be provided with equal access to activities assisted under this Act;
 - ii. will not be discriminated against on the basis of status as a member of a special population;
 - 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;
 - iv. will be provided with appropriate accommodations; and
 - 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)

i. will be provided with equal access to activities assisted under this Act:

All Minnesota students deserve high-quality learning opportunities that lead to workforce readiness and access to further learning. The pursuit of educational equity recognizes the historical conditions and barriers that have prevented opportunity and success in learning for students based on their race, gender, language, disability, income, and other social conditions. All stakeholders must work intentionally and collaboratively to correct these realities. Our Perkins principles state that we are committed to ensuring an equity lens for all decision-making. Minnesota's World's Best Workforce, the Every Student Succeeds Act (ESSA), and Minnesota's Commitments to Equity require meaningful inclusion of all students in the system and holding every public school accountable for the outcomes of each student group.

Equity is different from equality. Although equality demands that everyone is treated the same, equity recognizes the unique identity of a student that is too often impacted by racism, bigotry, or bias. Equity corrects these realities through conversations, actions, and distribution or redistribution of resources based on individual and group needs to eliminate structures and barriers to ensure equitable outcomes. By eliminating systemic barriers and biases, well-implemented Career and College Readiness (CCR) programs improve outcomes for underserved

students and benefit everyone. Commitments to equity provide the framework for school- and district-level actions that will result in greater access, participation, representation, and attainment of CCR skills for all students.

Applying specifically to Perkins-funded activities, all local consortium applications are reviewed by Minnesota State and Minnesota Department of Education staff to ensure that discrimination against members of special populations in learning, student recruitment and support services, and physical accessibility is not apparent in written goals, objectives, strategies, or policies. It is an expectation that each local consortium will identify how the needs of special populations of students will be met to ensure that each learner can be successful and experience the same rigorous career and technical education programs leading to high-skill, high-wage, or indemand occupations.

Minnesota will continue to emphasize developing strategies that focus not just on prioritizing student recruitment but also on adopting evidence-based approaches and resources that ensure learner success. This work includes three broad categories:

1. Shared Practices

- a. Sharing practices for supporting students in special populations, especially students with disabilities, English language learners, the homeless, and non-traditional CTE programs. Outreach through campuses and community-industry partnerships, for example, will be utilized to educate local consortia and support partnerships for communities of practice to address equity in CTE programs.
- b. Provide professional development to educators and faculty--through our annual CTE conference, webinars, and other venues-- on effective tools and strategies for supporting learners and ensuring equity and access to effective support services, without regard to race, color, national origin, gender or (dis)ability.

2. Technical Assistance

- a. Provide support to institutions challenged with performance or compliance areas by hosting technical assistance sessions, resources, etc., to address their challenges and ensure the success of special populations.
- b. Provide one-on-one consultation or other assistance to address barriers to access and participation in CTE programs. Partnerships from local and national sources are leveraged to examine equity challenges, priorities, and research.

3. Partner Engagement

- a. Extend outreach to include community and industry input on meaningful and quality CTE opportunities and experiential learning. Provide opportunities for funding through an RFP grant process to support these efforts and scale practices.
- b. Active engagement and participation with Minnesota State committees and other partners also focused on equity and access for student populations.

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

Under Perkins V, Minnesota will continue to follow the Office of Civil Rights guidelines and requirements. OCR Guidelines require each state agency receiving federal financial assistance that offers or administers vocational education programs to develop and implement a program to monitor compliance with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973. Compliance with the law will include a review of institution documents and publications containing Title VI, Title IX, and Section 504 policy statement(s) of nondiscrimination; language or media used in public notifications other than English if necessary; and statement(s) or write-up(s) used to notify the public of nondiscrimination in career and technical opportunities including date(s) issued.

Minnesota State has adopted the general philosophy that this compliance program be perceived and projected as an opportunity to put students first and to improve the learning environment through activities that allow the system to examine the status of existing conditions, identify problems that exist, plan and implement correction and/or improvement, and provide the changes as opportunities for improvement across the Minnesota State system.

In addressing our secondary student population, the Minnesota Department of Education Civil Rights Compliance Review program is designed to ensure that all groups and populations have an equal opportunity to access their education:

- Review data and records, interview staff and students, administer a survey, and examine facilities for accessibility.
- Prepare a letter of findings, detailing areas that are out of compliance, and assist
 with the development of a voluntary compliance plan that outlines what will be
 done to come into compliance.
- Assist with completing the items on a voluntary compliance plan, including providing technical assistance and sample policies and procedures.
- Provide technical assistance to consortia to help address challenges that improve
 the success of special populations. This may include strategies such as one-on-one
 sessions to support improvement plan development, sharing resources, or utilizing
 experts for specific special populations.

Secondary

The Minnesota Department of Education is required to submit to the United States Department of Education, Office for Civil Rights (OCR), a Biennial Civil Rights Compliance Report. It is MDE's responsibility to conduct comprehensive on-site reviews of school districts to address issues of discrimination based on race, color, national origin, sex and disability in vocational education programs. Specialists with the Compliance and Assistance Division within the Minnesota Department of Education will review Minnesota school districts on a cyclic time frame.

Postsecondary

Minnesota State has demonstrated a long-standing commitment to equity and ensuring that members of special populations are provided equal access to programs. Each year Minnesota State conducts a minimum of four Office of Civil Rights (OCR) compliance reviews. The major purposes of the OCR compliance review are to ensure that community colleges are providing equal access to CTE through vigorous enforcement of civil rights in compliance with the requirements of Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Vocational Rehabilitation Act of 1973, and Title II of The Americans with Disabilities Act (ADA). In addition to conducting a minimum of four local OCR On-Site Compliance Reviews each year, Minnesota State provides ongoing technical assistance to community college staff members on equal access.

Both the Minnesota Department of Education and Minnesota State provide professional development to staff and Perkins consortia leadership as well as teachers and faculty. The Office of Equity and Inclusion and the Office of General Counsel also provide professional development.

The Minnesota State Board of Trustee Policy 1B1 addresses Equal Opportunity and Nondiscrimination in Employment and Education. Individual campuses are also required to apply the Minnesota State Board of Trustee Policy or implement a local policy providing not less than the system criteria.

Minnesota State Board of Trustee Policy 1B1 Part 1. Policy Statement.

Subpart A. Equal opportunity for students and employees. Minnesota State Colleges and Universities has an enduring commitment to enhancing Minnesota's quality of life by developing and fostering understanding and appreciation of a free and diverse society and providing equal opportunity for all its students and employees. To help effectuate these goals, Minnesota State Colleges and Universities is committed to a policy of equal opportunity and nondiscrimination in employment and education.

Meeting the Needs of Special Populations

MDE's Equity Statement follows: Educational equity is the condition of justice, fairness, and inclusion in our systems of education so that all students have access to the opportunities to learn and develop to their fullest potential. The pursuit of educational equity recognizes the historical conditions and barriers that have prevented opportunity and success in learning for students based on their race, income, and other social conditions. Eliminating those structural and institutional barriers to educational opportunities requires systemic change that allows for distribution of resources, information, and other support depending on the student's situation to ensure an equitable outcome. For example, within the Minnesota Department of Education, there is an effort to improve alignment of CTE work with ESSA initiatives. We support and collaborate with state specialists and educators in our special education division, homeless student liaison staff, as well as our English learner division, all of whom have a strong start toward reducing and eliminating performance gaps.

Minnesota State has identified the following goal: "By 2030, Minnesota State will eliminate education equity gaps at every Minnesota State college and university." This goal is known as "Equity 2030."

Minnesota's Perkins V priorities align with Equity 2030's focus areas:

- Enhancing access and student success
- Providing Minnesota with the talent it needs
- Anchoring the communities and regions we serve

Meeting the needs of special populations under Perkins V involves similar efforts to Minnesota State Equity 2030 goals:

- Improve outcomes for student populations
- Data disaggregation (analysis)
- Technical assistance to address systemic inequities
- · Provide recommendations for equity-minded approaches
 - 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;

One of the strategies in place to help special populations meet or exceed state levels of performance involves providing awareness of and recruitment into programs of high-skill, high-wage, or in-demand sectors or occupations. Continuous professional development including a series of webinars on special populations, collaborative projects, and state leadership conferences for our coordinators provide multiple opportunities for shared practices, tools, and strategies.

Minnesota has developed, supported, and encouraged the use of electronic career guidance tools for raising awareness of career options. Examples of guidance tools for learners to explore and build individual career plans include the Minnesota Career Information System (MCIS), CareerWise, and the Disability Hub, sponsored by the Minnesota Department of Human Services and multiple state agencies. The website has transition information for students with disabilities, including information about E1MN--Minnesota's state agency partnership to advance Employment First outcomes for youth and adults with disabilities.

Minnesota State continues to provide CTE equity capacity-building grants. This funding program supports consortium efforts for actionable steps in addressing equity priorities identified in the CLNA. Funding supports capacity issues relating to activities, such as policy analysis and review (e.g. the review or establishment of equitable processes), community engagement, and partnerships.

Minnesota uses many data tools to provide research and additional useful information about available career options. These tools also provide information on non-traditional careers and career options for ex-offenders. Examples include:

- Career profile integration <u>Accountant example</u>
 (includes job counts, top employers, top skills, top certifications, and links to job postings)
- 2. Industry profile integration <u>Utilities business example</u> (includes top employers, links to job postings)
- Minnesota State CAREERwise <u>Integrated job search tool</u> (includes job postings and multiple options to filter data)
- 4. <u>Minnesota Career Information System</u> (MCIS) online career exploration system, including Junior (middle school), Special Education, and Adult Basic Education versions
- 5. Tools and insights into career clusters through the lens of employer demand

In summary, efforts to address equity in CTE will focus on four pillars that are guided by federal requirements:

- Professional development programs (capacity and competency)
- Address equal access to activities under this Act (existing programs)
- Programs that help special populations meet or exceed state performance (interventions and innovation)
- Non-discrimination (compliance)

To provide actions in support of these four pillars, the Minnesota Perkins team engages in the following:

- Professional Development for faculty, teachers, counselors, and staff to address disparities including underrepresentation in nontraditional career programs. Further professional development on the impact of poverty and implicit bias on classroom teaching practices, student engagement and advising. Education Innovation Faculty development can also serve as a source for delivering equity training.
- Technical Assistance to local consortia on equity assessment of programs of study, supports for special populations and campus or school environment. The Minnesota State Office of Equity and Diversity can serve as one of many resources for technical assistance.
- Community and Employer Engagement to broaden outreach to community-educationemployer partnerships (and communications) about the opportunities and value of CTE for career development and work preparation.
- System approaches to support shared best practices among diverse geographic regions of state on strategies and delivery methods proven effective in expanding the educational experiences and nontraditional career options for special populations. Use of incentivized support to replicate or scale proven practices. Community organizations,

workforce centers and state agencies are invited via RFP process and state register notification to apply for funding to support corrections and disabilities services.

- Compliance and Non-discrimination: both internal and external partners, such as OCR compliance officers, are engaged to identify and develop system strategies and technical assistance needed for addressing disparities or equity related performance gaps.
- Provide incentive and capacity-building funding to support innovation for initiatives that increase the success of special populations. Metrics and measurements related to support requires the disaggregation of Perkins data regarding performance on core indicators and the support for the redistribution of funds to support equity.

iv. will be provided with appropriate accommodations;

Equal opportunity to enter CTE programs, services, and activities requires equal access for learners with special needs as compared to the general student population. Such provisions are reviewed for compliance throughout all required accountability indicators. Specific strategies to address learner accommodations include auxiliary or related aids and services, modified instructional equipment, and modified or adapted course offerings. Accommodations are provided for persons with disabilities in regular or special needs occupational programs. Accommodation services are publicized and encouraged by teachers, faculty and staff. Students with IEPs are assessed for career interests and abilities. The IEP reflects [career] education and training leading to the outcome of competitive, integrated employment (ACTE-SPED, MN Department of Education).

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)

Work-based learning (WBL) provides appropriate accommodations for students of various ability levels. All students, regardless of abilities, must have impactful experiences. WBL experiences provide:

- Guidance to schools and employers on perceptions of quality WBL and value to all student populations.
- WBL experiences and activities that offer high quality content and curriculum, including a range of levels from exploration (experiential learning) to work experience, career preparation and instruction that is "stackable" and explores multiple aspects of a targeted industry or occupation.
- WBL that has quality content and learning experiences as an integral part of CTE, supporting meaningful career development.

At the secondary level, appropriate accommodations, and support for a competitive, integrated work environment for students with disabilities are undergirded by Minnesota's Olmstead Plan. Named after a United States Supreme Court decision, the Olmstead Plan is a statewide comprehensive plan to provide people with disabilities opportunities to live, learn, work, and enjoy life in integrated settings. The plan calls out multiple education-related goals,

including those listed below, requiring the support of career and technical education at the secondary level:

- By June 30, 2025, the number of students with developmental cognitive disabilities, ages 19-21, that enter competitive integrated employment through the Employment Capacity Building Cohort (ECBC) will be 1,513.
- By June 30, 2025, the percentage of students with disabilities who have enrolled in an integrated postsecondary education setting within one year of leaving high school will increase to 34.8% (from baseline of 29.8%).

To that end, secondary career and technical education programs will provide appropriate accommodations and support for a competitive, integrated work environment through a variety of strategies targeted specifically at work-based learning (WBL) programs. These strategies will increase the quality of programs, enhance educator expertise, and capitalize on partnerships with other state agencies.

High-Quality Work-based Learning Programs

Every five years, school districts will engage in a formal program approval process for work-based learning (WBL) programs specifically designed for students with disabilities. The program approval process, as outlined by administrative rule, identifies the minimum requirements needed to ensure all students engage in a well-designed work experience aligned to their interests and skills. Once a school district's program is approved, the district may access additional state funding to modify curriculum and purchase special equipment for students with disabilities enrolled in the WBL program.

Educator Expertise

The Minnesota Department of Education (MDE) will provide direct technical assistance to teachers who work with students with disabilities to ensure that work-based learning (WBL) programs are well-designed to align with students' interests and skills. Additionally, MDE will coordinate professional development for WBL coordinators with programming related to competitive, integrated work environments.

Partnerships

Minnesota Department of Education staff will continue to work closely with colleagues as part of the Employment First Minnesota (E1MN) partnership. E1MN is Minnesota's state agency partnership to advance Employment First outcomes for youth and adults with disabilities. E1MN is led by the State of Minnesota Departments of Education (Career and Technical Education and Special Education), Employment and Economic Development (Vocational Rehabilitation Services and State Services for the Blind), and Human Services (Disability Services Division) to ensure each agency, when possible, uses similar language and processes when working with school districts to provide high quality work-based learning (WBL) experiences for students with disabilities and to eliminate barriers that prevent school districts from offering these 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)

Minnesota will continue to prioritize the recruitment, retention, and preparation of CTE educators and support them in their professional and educational development so they can teach, lead, support, and work with a diverse range of students, including special populations and communities of color, immigrant and refugee communities, Tribal Nations, and indigenous people.

The <u>2023 Biennial Minnesota Teacher Supply and Demand Report</u> prepared by the Minnesota Professional Educator Licensing Standards Board (PELSB) found that Minnesota school districts are facing a shortage of licensed teachers across grade levels and in most disciplines. Licensure areas with a high percentage of teachers on special permission (out of their licensure area or without a standard teaching license) include Career and Technical Education fields, world languages, special education, and STEM. The report also noted that the percentage of teachers of color remains stagnant while the percentage of students of color continues to grow. Particularly concerning is the teacher shortage in all CTE licensure areas.

The continued focus that supports these efforts includes:

- Providing more support for teaching and learning resources for college technical faculty.
- Supporting initiatives focused on prospective CTE teachers of color as they pursue licensure.
- Emphasizing culturally responsive teaching and learning strategies for all educators.
- Continuing to convene a <u>statewide CTE conference</u> serving secondary and postsecondary educators, industry partners, and CTE leaders focused on sharing evidence-based practices in CTE.
- Assessing pathways for non-licensed educators (paraprofessionals) to pursue CTE licensure.
- Providing mentoring and coaching for new CTE teachers.
- Supporting activities and collaborations across organizations that actively strive to retain CTE educators.
- Increasing and diversifying the secondary educator workforce across the state through local legislative grant funds.
- Supporting professional learning communities for new CTE teachers.

- Supporting local professional and educational development pursuits for all educators.
- Supporting alternative paths to CTE teacher licensure.
- Collaborating with local CTE professional organizations that support CTE educators and administrators.

Secondary

- The Minnesota <u>Career and Technical Educators Teacher Induction Program</u> (CTE TIP) program is a partnership with the Minnesota Association of Career and Technical Education (MNACTE) designed to help teachers gain the knowledge and resources they need to be successful in the secondary CTE classroom. CTE TIP functions as a professional learning community to support the development, efficacy, success, resilience, and retention of new CTE teachers. Mentoring and professional networking are offered through in-person conferences and virtual settings.
- The Minnesota Department of Education recently launched the <u>Educator Workforce and Development Center</u>. The Center will lead the implementation and establishment of programs being built or expanded out of the 2023 legislative session and the continued oversight of existing workforce education programs and will focus on programs to support districts, schools, communities, and Tribal Nations in work to recruit, diversify, develop, and retain educators. Center staff will build partnerships with other state agencies and the education community.
- Through multiple state grants, the Minnesota Department of Education will continue to
 increase and diversify the educator workforce with the support of the governor's office
 through its <u>Increase and Diversify the Educator Workforce Initiative</u>. Specific goals and
 activities are determined in alignment with local Perkins CLNA results combined with
 the overall needs of the state.
- Education for students with disabilities, appropriate accommodations, and support for a
 competitive, integrated work environment for students with disabilities are undergirded
 by Minnesota's Olmstead Plan. Secondary career and technical education programs
 provide appropriate accommodations and support for a competitive, integrated work
 environment through a variety of strategies targeted specifically at work-based learning
 (WBL) programs. These strategies will increase the quality of programs, enhance
 educator expertise, and capitalize on partnerships with other state agencies.
- Minnesota's first <u>alternative teacher preparation program</u>, coordinated through Lakes Country Service Cooperative (LCSC), includes the Career and Technical Education Core program, Teacher Coordination of Work-Based Learning, Construction Careers, Transportation Careers, and Manufacturing Careers licensure programs.

Postsecondary

The <u>Minnesota State Network for Educational Development</u> (NED) provides professional
and educational development resources for all college and university educators,
including college technical faculty, to promote and sustain academic excellence by
providing relevant programs relating to classroom climate, content, teaching practices,
equity, and assessment. Technical faculty can access these courses and workshops

online at no cost. All courses are designed by faculty and staff for faculty and staff, cultivating a peer-to-peer learning community.

- Technical college faculty have access to on-site professional and educational development resources on their campus through a center for teaching and learning (CTL). Some CTLs offer mentoring through communities of practice based on discipline.
- <u>FY2023 Minnesota State System Office Workplan</u> supports and enhances the ability and capacity of campuses and the system to attract, retain, and develop a diverse and inclusive workforce able to meet the current and future educational needs more effectively.
- Continued partnership with the eight <u>Minnesota State Centers of Excellence</u>, each serving a major industry that faces serious workforce challenges in IT, Healthcare, Manufacturing, Energy, Transportation, Agriculture, and Engineering.
- The Minnesota State Office of Equity and Inclusion supports all CTE leaders, staff, deans, and faculty by providing professional development in a wide range of equity topics that help leaders better understand the diverse range of students we serve.

By addressing these challenges and supporting the work of local Perkins consortia, Minnesota State and MDE collectively work towards attracting and retaining the best and brightest technical education professionals, ensuring that our students receive the best, most affordable, high-quality education available.

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
 - a. each eligible recipient will promote academic achievement;
 - b. each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and
 - 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. (Section 122(d)(5) of Perkins V)
 - a. each eligible recipient will promote academic achievement;

Continuing Minnesota's consortium model, eligible recipients must offer Career and Technical Education (CTE) programs that include rigorous, coherent CTE content aligned with challenging academic standards. All approved state-recognized programs of study must include opportunities for both academic and technical skill attainment, which, ideally are integrated. The *State-recognized Program of Study Guide* includes the requirement that "course standards"

accurately align to the academic, technical, and employability skills learners must master for entry and success in a given career pathway." This articulates that the foundation of a program of study is the academic skills a student must have to enter and advance in career and/or college.

Academic skills as the foundation of a program of study is further emphasized in the Minnesota Department of Education's work on Career and College Readiness (CCR). In March 2016, MDE, in collaboration with the Regional Educational Laboratory (REL) Midwest and the Midwest Comprehensive Center (MSCC), brought together a group of educators and administrators to articulate what career and college readiness means for Minnesota students. Minnesota's vision of CCR is that a well-rounded view of education is needed to drive educational and workforce goals and policies. Taking many perspectives into consideration through feedback, the Minnesota CCR Work Group developed a holistic vision of career and college readiness:

A sufficiently prepared student is one who has the knowledge, skills, mindset, and experiences in the academic, workplace, and personal/social domains to keep learning and, beyond secondary school, to successfully navigate toward and adapt to an economically viable career.

Clearly, academic skills are at the very foundation of career and college readiness. CCR resources developed by MDE and distributed to secondary districts provide a comprehensive set of guidance, strategies, and tools for engaging districts and schools in equity-oriented CCR program planning and a continuous improvement process.

 each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential;
 and

Historically, reporting of technical skills assessment has been part of an intentional review process in Minnesota for more than a decade. The technical skill assessment project began with a pilot group of five programs of study completing a comprehensive review of foundational and academic knowledge, skills, and technical competencies needed to gain employment in selected careers. Through this collaborative process, secondary teachers, postsecondary faculty, business/industry experts validated the appropriate competencies, and technical skill assessments that would support these competencies. Minnesota continued the completion of this process of bringing the secondary and postsecondary teaching staff together with their business and industry partners twice to analyze each of the 72 career pathways. The review process continued to update and validate competencies and the identification of assessments with over 600 secondary teachers and 500 post-secondary faculty along with business and industry representatives participating. The TSA reports were an essential component of the Perkins IV work.

In the implementation of Perkins V, skill attainment remains a priority of the work. The documentation of skill attainment will continue to be an element required for designation as a state-recognized program of study and as an element of program review at secondary and postsecondary institutions. All state-recognized POS have a pathway leading to a recognized postsecondary credential. The definition of recognized postsecondary credential utilized is the WIOA definition. Under WIOA the term "recognized postsecondary credential" means a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree. In addition, Minnesota continues to validate the definitions of program quality and determine baseline data for CTE concentrators. The complete accountability system, secondary and postsecondary, monitors academic performance and completion rates including CTE subpopulations. Professional development and technical assistance are provided for consortia to develop and implement continuous improvement plans.

The state-recognized programs of study require an approved MDE CTE program and an approved Minnesota State program. An approved program must meet state requirements, including the academic and technical knowledge and skill components. In a similar fashion, a postsecondary approved diploma or associate degree award consists of general education and technical courses. The program approval process for both has elements of interaction with business and industry through the requirement of program advisory committees.

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. (Section 122(d)(5) of Perkins V)

As part of a local application, consortia must include a comprehensive local needs assessment (CLNA) as per Perkins V requirements to be an eligible recipient of funds. All elements documented in Perkins V will be required: student performance; sufficient size, scope, and quality; progress toward programs and programs of study; recruitment, retention, and training of CTE professionals; and equity of access. The state's definition of size, scope, and quality, and alignment to labor market include parameters for the identification of high-skill, high-wage, and in-demand occupations. Both Minnesota's *Comprehensive Local Needs Assessment Guide* and the *CLNA Framework* provide guidance to ensure that local economic and education needs are taken into consideration. State leadership reviews the applications and has a dialogue with applicants to ensure section 122 is observed. On an ongoing basis, the consortium monitoring process reviews the evidence that the CLNA data and implemented actions took local economic and education needs into consideration.

State staff review research, consult with other states, and glean promising practices from the states' experience with WIOA and ESSA needs assessments to continuously improve the CLNA process and associated forms and guide to increase consortia success in gathering, analyzing,

and implementing actions from the CLNA. Professional development regarding the form, guide, and process is offered in webinars and through technical assistance. The joint secondary and postsecondary applications submitted by consortia must provide performance targets and strategies for continuous improvement of academic achievement and technical skill attainment linked to comprehensive local needs assessment.

- 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

State Administration: 5%

Administration allocation is spent on activities related to developing the State Plan, reviewing applications, monitoring consortia, compliance oversight, and supporting fiscal and data systems required to implement Perkins V, etc.

State Leadership Activities: 10%

Leadership funds are split between the Minnesota Department of Education (42%) and Minnesota State (58%). From the postsecondary leadership funds, set-asides specified in Section 112(a)(2) of Perkins V are earmarked to serve individuals in state institutions, prepare individuals for non-traditional fields, and recruitment of special populations into CTE programs.

Distribution to Local Education Agencies (Consortia): 85%

In Minnesota, funds received by the eligible agency under section 111 will be allocated to local consortia according to the following allotments and calculations. These distribution methods are expected to provide the resources needed for student success in the workplace throughout the state, including the maximum of 15% in reserve funds to incentivize innovation and quality of programs of study. The reserve fund calculation will be split by formula to target both rural areas and applications serving high numbers of CTE students. Eighty-five percent of the funds received by the state will be distributed to local applicants through the basic and reserve funding allocations under Sections 131 and 132.

Basic funding: Eighty-five percent of the 85% distributed to local applicants will be distributed as basic funding, with secondary programs receiving 50% of the 85% and postsecondary receiving 50% of the 85%. The 50:50 split represents a philosophical commitment by Minnesota State and Minnesota Department of Education leadership to advancing equal opportunity and economic empowerment for both partners in the consortium.

Reserve funding: Fifteen percent of the 85% will be distributed to secondary and postsecondary programs on a 50:50 basis as reserve funding. These funds take into consideration "rural" and high numbers by adding the square mileage of the consortium part of the calculations. Allocation amounts to the whole consortium are based on a 50% sum of the area for member districts in the consortium area if/as the consortium has greater than 50 square miles of area served.

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. (Section 122(d)(8) of Perkins V)

While consortia will submit a single application and receive an overall award, the calculations for the consortium will be based on:

Local Consortium Formula Allocation amounts:

Secondary formula:

- Most recent U. S. Census data for the population by school district of individuals aged 5- 17
- Most recent U. S. Census data for the population by school district of individuals aged 5- 17 in households of poverty
- Description (70% District population 5-17 in poverty/state population 5-17 in poverty times the total secondary formula amount) plus 30% district population 5-17/state population 5-17 times the total secondary formula amount for the state from the OCTAE allocation 50% is calculated for each district. The secondary consortium formula = the sum of the amounts calculated for each district member of the consortium.

Postsecondary formula:

- Most recent data for CTE Postsecondary Pell Recipients
- Description (Pell recipients in the college in Perkins eligible programs/ Pell
 recipients in the state in Perkins eligible programs times the total postsecondary
 formula amount for the state from the OCTAE allocation 50% is calculated for
 each college. The postsecondary consortium formula = the sum of the amounts
 calculated for each college member of the consortium.

For all calculations, the year representing "most recent" is consistent across all formulas.

3. 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)

When a school district changes boundaries, splits or merges, Minnesota revises formula populations as soon as the new population information is available. The process for a district or college changing to a new consortium is outlined in Section 4 of the Minnesota Perkins V Operational Guide. Minnesota State partners with MDE to obtain any population data changes if school district boundaries change. Charter schools with approved CTE programs or secondary schools funded by the Bureau of Indian Education are incorporated into consortia.

- 4. 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).

Minnesota will not be submitting a waiver to the secondary allocation formula.

- 5. 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).

Minnesota will not be submitting a waiver to the postsecondary allocation formula.

6. If the eligible agency will award reserve funds to eligible recipients under section 112(c) of Perkins V, describe the process and criteria for awarding those funds.

Fifteen percent of the 85% distributed to local education agencies (consortia) is allocated for reserve funds. Minnesota apportions reserve funding to the whole consortium based on: a) 50% on the sum of the area for member districts in the consortium/area for all districts in the state, b) 37.5% on the sum of secondary participants for member districts in the consortium/total secondary CTE participants in the state, and c) 12.5% on the sum of postsecondary participants for member districts in the consortium/total CTE postsecondary participants in the state based on the following data:

- School district area to account for certain district consolidations
- Most recent data for CTE Secondary participants
- Most recent data on Perkins CTE participants

State priorities will guide the use of reserve funding by consortia. Consortia are required to invest reserve funds in alignment with annually reviewed state priorities. The reserve fund priorities for FY25 are addressing performance gaps and developing or improving programs of study.

7. 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)

Using aggregate numbers of state support for CTE, which is calculated by excluding tuition revenue and allocating indirect expenses, the maintenance of effort for 2018 is equal to \$124,944,120.00. Since the establishment of a baseline was a one-time MOE expenditure adjustment for the first year of Perkins V (7/1/19 to 6/30/20), there is no subsequent update to this information.

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;
 - 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
 - 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, 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.

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.

During May 2019, the Perkins V Secondary Accountability: Technical Advising Committee convened for three in-person meetings to discuss key questions and decision points around the updated legislation. This group represented a variety of secondary perspectives. Options for performance indicators and data sources were shared with the advisory group, who then discussed the issues and provided recommendations to MDE. The advisory group also provided recommendations for future work such as improving secondary, postsecondary, and business and industry partnerships so that additional industry-recognized credentials could be identified and implemented. This would enhance the connection between Perkins V and WIOA and provide more 'Career Ready' opportunities for students.

Once the full scope of the accountability system and methodology for determining levels of performance were finalized, the previous recommendations made by the advisory group were then further analyzed by state leadership. Based on data review, state-level priorities, and the additional feedback survey information collected from members of the original secondary advisory group as well as secondary consortium leaders, and in consultation with state leadership, it was determined that the optional other program quality indicator (5S4) identified as the technical skill attainment and/or industry-recognized credential should not be included in the secondary accountability system. The final decision was to include (5S3) Program Quality: Work-Based Learning, definition as follows:

Numerator: Number of CTE Concentrators who successfully completed one or more workbased learning courses prior to graduation.

Denominator: Number of CTE Concentrators who graduated high school.

2. Provide on the form in Section V.B, for each year covered by the State plan beginning in program year (PY) 2020-21, State determined performance levels for 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)

State Determined Performance Levels (SDPL) Form State Name: Minnesota

		Performance Levels by Program Year						
SECONDARY INDICATORS	BASELINE LEVEL, 2020	2020-21	2021-22	2022-23	2023-24	2024-25		
1S1: Graduation Rate (four-year)	92.21%	54.95%	54.99%	55.08%	55.26%	92.70%		
251: Academic Proficiency: Reading/Language Arts	0.00%*	11.27%	11.33%	11.45%	11.68%	53.09%		
2S2: Academic Proficiency: Mathematics	0.00%*	9.08%	9.11%	9.17%	9.29%	36.47%		
2S3: Academic Proficiency: Science	41.83	**	**	**	**	41.84		
3S1: Post-Program Placement	65.70%	48.43%	48.49%	48.61%	48.84%	55.06%		
4S1: Nontraditional Program Concentration	36.31%	9.44%	9.49%	9.59%	9.79%	28.15%		
5S3: Program Quality: Work-Based Learning	13.08%	4.33%	4.34%	4.37%	4.41%	13.19%		

^{*}NOTE: Due to the COVID-19 peacetime emergency, MCA (Minnesota Comprehensive Assessment) testing was canceled, therefore, no Reading or Mathematics academic achievement data are available during SY2019-20.

**As explained in the text, Minnesota did not set a 2S3 SDPL for grant years 1-4.

		Performance Levels by Program Year						
POSTSECONDARY INDICATORS	BASELINE LEVEL, 2020	2020-21	2021-22	2022-23	2023-24	2024-25		
1P1: Postsecondary Retention and Placement	90.77%	91.12%	81.98%	81.98%	81.98%	91.03%		
2P1: Earned Recognized Postsecondary Credential	50.68%	50.60%	45.58%	45.58%	45.58%	53.01%		
3P1: Nontraditional Program Enrollment	13.98%	14.00%	12.54%	12.54%	12.54%	17.37%		

- 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. description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the Statedetermined 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);
 - b. an explanation for the State-determined levels of performance that meet each of the statutory requirements in Text Box 8; and
 - 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).

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.

For the original Minnesota Perkins V plan (2020), multiple statistical approaches were reviewed to establish state and local performance levels, including the statistical adjustment model used for the WIOA Performance Accountability System, trend extrapolation, and statistically significant increases using simulated historical data. After consultation with representatives from consortia, stakeholders, and regional partners, it was determined that the most appropriate approach for Minnesota was to set the proposed state performance level for each accountability indicator using a factor of the standard deviation of simulated historical data. This procedure allows for the determination of what level would constitute "meaningful progress" for each indicator, establishing statistically significant improvement relative to the baseline by the fourth year of the plan.

At both the secondary and postsecondary levels, simulated historical accountability datasets were created using specifications and definitions per the *Strengthening Career and Technical Education for the 21st Century Act*. These data were used to set the baseline year (the most recent year for which accountability results were available). Then, a conservative rate of growth (i.e., slower growth during the first two years, followed by more aggressive growth during the final two years) was applied to determine the annual performance levels. A conservative growth rate was adopted for the first two years in recognition that programs and strategies implemented under Perkins V would require some lead-time before the full impact on rates would be observed, but at the same time the methodology incorporates continuous improvement each year.

The same overall methodology was used to determine state performance levels for both secondary and postsecondary indicators, with the following exceptions:

- The number of historical years of data that were available varied by indicator, with some indicators having as few as two years of historical data available, but most indicators having five or six years of historical data; and
- The factor of the standard deviation used differed for some of the indicators.

Although using the standard deviation of simulated historical data was the best approach identified, we also recognized some caveats associated with the methodology. Those caveats, along with other external factors that could impact indicators and result in potential amendments to performance levels, were noted:

- Simulated historical data for some indicators were limited to only two or three years
 due to substantial changes in the data over time or unavailability of historical data going
 back more than a couple of years. The factor of the standard deviation was adjusted to
 account for the limitation. However, once additional years of data are observed, there
 may be evidence that the standard deviation of the simulated historical data was
 substantially different (higher or lower) than what would have been derived with
 additional data points.
- We may find the methodology needs modification even for indicators where six years of simulated historical data were available. Statistically, even six observations is a small number and may yield an over- or under- estimate of average random variation. After the first two years, we may need to adjust the factor of standard deviations such that it more accurately reflects the observed random variance. Given that we anticipate lower programmatic impact in the first two years of the plan due to the time it takes to realize change, we would use those data to reassess the random variance and request adjustments accordingly.
- This methodology presumes conservative growth in the first two years with more aggressive growth in the final two years of the plan. As such, we assumed a doubling of improvement each year of the plan. These presumptions were based on a logical understanding of the process implementing new initiatives, but the actual numeric weights for the annual change were an educated guess. As we move forward with data collection, differences in observed speed of improvement may necessitate performance level adjustments.
- This methodology presumes the make-up of students in the denominator (CTE concentrators) and economic conditions will remain relatively constant over the next four years. Any substantial changes to either of these things may necessitate an adjustment of performance levels.
- Changes in core elements driving an indicator, such as changes to the Minnesota standards in reading/language arts, mathematics standards, updates to the Minnesota

Comprehensive Assessment (MCA) tools, or changes in the employment market would likely impact performance levels.

 Other changes to data collection, data quality, or data availability could also substantiate requests to adjust performance levels.

Minnesota does meet the statutory requirements specified for the state-determined performance levels. The performance levels are specified as percentages for each secondary and postsecondary core indicator and the levels require meaningful progress toward improving the performance of all CTE concentrators over the grant timeframe. The state performance levels were subject to the public comment process and responses to the comments are included in section D4.

Regarding the extent to which the state-determined levels of performance advance the eligible agency's goals, as set forth in the state plan (3a) and how the SDPLs align with levels, goals, and objectives of other federal and state laws, 1P1 is a similar, but broader measure of placement of program completers in WIOA. The Perkins V indicator includes both employment placement and continuing postsecondary education and other parameters we are currently unable to capture – military, peace corps, advanced training, etc. Indicator 2P1 is a measure of completion as Minnesota has defined it, which aligns with the WIOA completion measure and is related to state credential attainment goals.

[Note to reader: The following information documents the procedure for determining SDPLs for the 2024 Minnesota Perkins V State Plan Annual Revision. Although Minnesota elected to submit an annual revision to the original Four-Year State Plan, SDPLs were established for the next four program or fiscal years (2024-2027). The SDPLs Minnesota established for grant years 6 through 8 will be implemented so long as they meet the requirements of Section 113(b)(3)(A)(i)(III)(ee).]

3a. 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);

SDPL Engagement and Input Opportunities for Key Partners

Minnesota State Research staff held a webinar with a subset of college institutional research directors engaged in CTE reporting at their postsecondary institutions on October 20, 2023. In this webinar, Research staff presented more detailed information about the data reviewed to inform the proposed postsecondary state-determined performance levels for grant years 5 through 8, provided information about the specific methodology used to set each postsecondary SDPL, and asked attendees to provide feedback on the SDPLs through an online form through November 9, 2023. In total, 15 people attended the webinar (including state staff) and none of the attendees provided feedback or asked questions during the webinar. On October 23, 2023, a reminder email was sent to college institutional research directors

reminding them of the opportunity to access the recording of the webinar and to provide feedback in the online form through November 9, 2023. Zero responses were received to the questions in the online form.

Minnesota State and MDE Research staff held an in-person meeting with Minnesota Consortium Leaders at the Annual Perkins Leaders Fall Meeting on October 31, 2023 to collect input on the proposed postsecondary state-determined performance levels for grant years 5 through 8. During this meeting, Research staff presented more detailed information about the data reviewed to inform the proposed state-determined performance levels for grant years 5 through 8, provided information about the specific methodology used to set each SDPL, and asked attendees to provide feedback on the SDPLs on posters hanging up in the meeting room. Attendees were asked to provide input on each SDPL using the acronym M(MINT)O:

Meaningful - Does the proposed SDPL for this indicator meet the requirement for "meaningful improvement"? Why or why not?

Methodology - Does the methodology for this indicator seem reasonable and meet the requirement for "meaningful improvement"? Why or why not?

Initiatives - What additional system, local, statewide, or regional initiatives could impact performance on this indicator?

New Changes - What significant changes to programs, interventions, data collection, or any other missing context or information could impact performance on this indicator? **Trends** - What regional workforce trends or new or ending partnerships could impact performance on this indicator?

Other - Share any additional input you would like to provide about the SDPL process or proposed SDPLs for this indicator.

A total of 34 comments on the proposed secondary SDPLS and 15 comments on the proposed postsecondary SDPLs were provided by attendees, including state staff. Attendees and state program staff were also given the opportunity to provide input through an online form through November 21, 2023. An email reminder inviting Perkins leaders to provide feedback through the online form through November 21, 2023, was sent on November 9, 2023, to all Perkins leaders. Zero responses to the proposed postsecondary SDPLs were submitted through the online form.

After carefully reviewing all 15 comments received on the postdentary SDPLs, the decision was made to not make any changes to the proposed SDPLs based on the input provided at the inperson meeting. However, postsecondary did acknowledge that some of the input expressed concern or recommended changes to the legislative definitions of the measures. In a follow-up email on December 13, 2023, it was communicated to Perkins consortium leaders that the state is not allowed to change legislative definitions of the measures but would note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level. The email also provided additional clarification on a few misunderstandings regarding the core indicator and SDPL data that were identified in the comments.

Following the consideration of the comments received during the Annual Perkins Leaders Fall Meeting on October 31, 2023; the proposed SDPL information was shared forward within the Minnesota Department of Education agency to key leaders in data analytics and executive team members. No further changes were recommended.

SDPL Public Comment Process

The public comment requirement for determining the program year 2025-2028 SDPLs was combined with the 2024 State Plan public comment process. See "3. Describe opportunities for the public to comment in person and in writing on the State plan" section for details on the process.

3b. an explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8 (Section 113(b)(3)(A)(i)(III) of Perkins V); and Text Box 8: Statutory Requirements for State Determined Performance Levels (Section 113(b)(3)(A)(i)(III) of Perkins V)

Calculating SDPLs and Baseline Percentages

Each SDPL is expressed as a percentage based on dividing the numerator for each indicator by the denominator for each indicator and multiplying this by 100.

For determining state determined levels of performance for Minnesota's 2024 State Plan Annual Revision under Perkins V, Minnesota was instructed by the Office of Career, Technical and Adult Education (OCTAE) to follow section 113(b)(3)(A)(i)(III)(ee) of Perkins V legislation, which interprets the establishment of SDPLs as allowable adjustments under Section 113(b)(3)(A)(i)(III) clause(ii). Section 113(b)(3)(A)(i)(III)(ee) of Perkins V states SDPLs shall, when being adjusted pursuant to clause (ii), be higher than the average actual performance of the two most recently completed program years.

Minnesota calculated the average actual performance of the two most recently completed program years for each secondary and postsecondary indicator by summing the percentage value of the actual performance in program year 2022 and program year 2023 and dividing this by two for each indicator to express the average actual performance as a percentage. This calculated average served as the baseline from which SDPLs were set for grant years 5 through 8 (i.e, program years 2025-2028).

On April 11, 2024, the Office of Career, Technical and Adult Education (OCTAE) provided new guidance that required Minnesota to set state determined levels of performance (SDPLs) higher than the average actual performance of the 2 most recently completed program years **for each grant year** beyond the original 4-year State Plan. Therefore, the SDPLs Minnesota established for grant years 6 through 8 will be implemented so long as they meet the requirements of Section 113(b)(3)(A)(i)(III)(ee). However, if the established SDPLs for grant years 6 through 8 do not meet the requirements of Section 113(b)(3)(A)(i)(III)(ee) or if qualifying unanticipated circumstances arise, Minnesota will need to adjust the SDPLs for grant years 6 through 8.

Meaningful Progress on Performance

At the September 27, 2023, Perkins V Collaborative Convening meeting, the Office of Career, Technical and Adult Education (OCTAE) indicated that while there is not an official legislative definition for "continuous meaningful progress," SDPLs for indicators cannot remain flat from year to year. However, OCTAE acknowledged that for indicators for which performance is already at a high rate (e.g., 94%), increases from year to year may be minimal compared to indicators where actual performance is not approaching a ceiling and there is more room for annual growth.

At both secondary and postsecondary levels, Minnesota applied a conservative growth model, either based on a statistical model or standard deviation(s) of change over time, depending on historical performance on the indicator. The methodology was applied over grant years 5 through 8, starting with the average of the actual performance of the two most recently completed years as the baseline. Minnesota also reviewed additional data to assist in providing context on determining the SDPLs. More detailed explanations of the information that was taken into consideration in determining SDPLs for each postsecondary and secondary indicator are provided below.

Determining Secondary SDPLs

Several methodologies were explored for determining secondary SDPLs for grant years 5 through 8, including both a linear probability model (slope of historical data) and a standard deviation model (which was used to set SDPLs for the previous state plan). Standard deviations (SD), or a fraction of an SD, were implemented for each performance indicator based on model fit. Multiple models were considered in terms of how to distribute continuous improvement increases across the years of the grant. Ultimately, a linear model based on historical trends, with equally apportioned increases each year provided the best fit and met the greatest number of established criteria.

1S1: Four-Year Graduation Rate — Based on this modeling process, our most assertive SDPLs were proposed for this indicator in order to achieve one standard deviation of growth across grant years 5 through 8. Although our performance outcomes are already high and therefore growth is more challenging to realize, based on a review of the national Perkins Collaborative Research Network (PCRN) data, it was determined that there is still potential for further improvement. Additionally, in reviewing local data trends for this indicator, it was discovered that the numerator is in fact growing, a higher number of CTE concentrators are indeed graduating in comparison with prior years—however, it is also the case that the denominator is currently out-pacing the growth of the numerator as more high school students become CTE concentrators in pursuit of learning marketable skills. We hope to address this growth challenge in the coming grant years and also ameliorate any remaining student group gaps.

2S1 and 2S2: Academic Proficiency – Declining outcomes for our academic achievement performance indicators have continued to persist post COVID-19 for both reading/English language arts and mathematics, as do the existing performance gaps for disaggregated student groups. This will be a priority for secondary education in the coming grant years; however, we do not know yet what to expect in terms of the potential rate of growth. Given the amount of focus needed and the level of ongoing uncertainty surrounding these performance measures, we have chosen to propose very conservative SDPLs.

2S3: Academic Proficiency (Science) -- Minnesota did not set performance targets for 2S3, Academic Proficiency in Science, during the transition year to Perkins V or in the 4 years following that within the scope of the 4-year State Plan. The reason for this is because Minnesota has not historically offered testing for academic achievement in Science in a consistent manner throughout the state. Although the assessment is standardized, the grade in which students complete the assessment is not. Students sit for the science assessment in either 9th or 10th grade depending upon when they complete the Life Sciences requirements in their school districts. With this revision to the Minnesota State Perkins Plan, OCTAE will no longer allow for this exception. Following consultation with OCTAE staff, the decision was made to set an SDPL for 2S3 based on the previous year's statewide data from the science assessment. A separate public comment period was held for the proposed 2S3 SDPL and comments from that are included in section D4 below.

351: Post-Program Placement – Additional circumstances which may have unknown future impact include estimates in the birthrate/demographic cliff. The current school year 2023 saw the highest number of twelfth-grade students that we will have had the opportunity to educate. Following the current year, we anticipate the number of twelfth-grade students to decline by approximately five thousand students, followed by a slight increase during grant year 2024-25, after which point the population of twelfthgrade students begins to decline sharply, particularly during the last two years of the new state plan, and does not appear to recover during the foreseeable future. In fact, this general pattern of declining enrollment holds true across all high school grades nine through twelve. In terms of enrollment and engagement with CTE programming, our percentages are remarkably consistent despite fluctuations in the overall general population; therefore, we remain hopeful that the impact on CTE enrollment will be minimal. However, there may be unknown impacts to some performance indicators more than others. For example, postsecondary enrollment has been decreasing across the last few years, most specifically for two-year enrollment and with a declining population on the horizon, this makes the need to be intentional even greater and the opportunity to grow ever more challenging. There are initiatives in place that we hope will assist in recruiting and retaining postsecondary enrollment and employment; even

so, the potential for continuous improvement remains unknown. Given this, we are proposing the most conservative estimates possible for this indicator.

4S1: Nontraditional Completion – Based on current data and future population estimates, Minnesota is already performing at a high rate for this indicator and our potential for improvement, based on our currently assigned CIP codes and ratio of programs, is minimal. Given this, we are proposing conservative estimates for this indicator.

5S3: Program Quality: Work-Based Learning – Although this performance indicator is closely tied to local economic opportunities and therefore deserves caution, we have experienced our highest post-COVID-19 rebound in student outcomes for this indicator. Further, growth and continuous improvement have been realized across all disaggregated student groups. Though there may be potential impacts due to the birthrate/demographic cliff previously discussed, we remain cautiously optimistic and are therefore proposing one standard deviation of growth across the four years of the new state plan.

In addition to the birthrate/demographic cliff, there are other local initiatives that may have both positive and negative impacts on our CTE concentrator population. For example, many dual-enrollment initiatives encourage students to complete college-level courses while still in high school that may result in unintentional consequences including competition for course time thus decreasing the opportunity to become a CTE concentrator. This may have a negative impact across all performance indicators, or this could create the possibility for students to finish a degree prior to high school graduation, thus not needing to enroll in a post-secondary program which may mean further decreases in 3S1: Post-Program Placement.

Even so, there are many other initiatives which we hope will off-set any negative impacts to performance outcomes, such as the possibility of including CTE concentrators into the ESSA system thus highlighting the value of CTE programming, personal finance courses will now be required for graduation thus potentially increasing the CTE concentrator population and interest in certain programs of study, the Computer Science Education Advancement program may assist in attracting students to our CTE career pathways, and further, CTSO grants, as well as additional funding for teacher recruitment and retention, could all play a vital role in assisting our programs, teachers, and students toward their continuous improvement goals. Although uncertainty and many future unknowns persist, sharing the results of the data review process with our secondary consortium leaders as well as leadership at the Minnesota Department of Education has provided us with insights into where the strengths and challenges exist such that we are now well-positioned to focus our efforts where needed most and

celebrate good work where accomplishments have been realized while continuing to implement our continuous improvement strategies.

Determining Postsecondary SDPLs

Several methodologies were explored for determining postsecondary SDPLs for grant years 5 through 8, including the same methodology that was explored for setting SDPLs for the original state plan (two standard deviations of growth applied through a conservative, aggressive, s-shaped or linear approach over four years), a linear probability model, and a moving average using ARIMA (autoregressive integrated moving average) model.

After exploring these methodologies, it was determined that a model with conservative linear growth over four years would be most suitable for establishing "meaningful progress" for each indicator, with the future forecast informed by the historical performance on Minnesota's postsecondary indicators, which have overall shown slow, steady growth. However, there are at least a couple of upcoming circumstances that may impact both Minnesota's CTE enrollment and student outcomes in unknown ways. This includes impending decreases in the college age demographic, referred to as the "demographic cliff" in higher education, while at the same time an implementation of Minnesota's new North Star Promise last-dollar scholarship (a.k.a. free tuition) program. It's unclear how the combination of these two things will impact general enrollment in higher education in Minnesota's public higher education institutions, but even more specifically what the impact will be on CTE program enrollment and performance. Therefore, a conservative approach was used to establish SDPLs. For each of the three core indicators, the SDPLs for grant years 5 through 8 were established using the slope of the regression line of both pre-Perkins V and Perkins V data (i.e., linear probability model). The baseline/starting point was the average of the two most recent years of performance (i.e., the average of performance from grant years 2 and 3). Additional considerations for each postsecondary indicator are also highlighted below.

- **1P1** During recent work related to a merger of colleges in our system, we found an error in the code that generates the numerator for this indicator across all institutions, so we anticipate slightly higher performance rates because of finding and resolving that error, which was undercounting students who were continuing their education at the same institution from which they graduated. In fact, Minnesota already showed slightly higher performance rates for 2023 due to the correction.
- **2P1** Minnesota State has several ongoing initiatives that could impact performance on this indicator, but these initiatives will take time to produce the desired results. In addition to initiatives specific to CTE/Perkins, there has long been a systemwide focus on increasing credential attainment. This started even before the 2015 Minnesota

Legislature enacted legislation setting a target that 70% of MN adults aged 25-44 will attain a postsecondary certificate or degree by 2025. In addition, several system-supported initiatives likely influence/will continue to impact credential completion, including:

- reverse transfer,
- UAchieve schedule and graduation planner,
- Math pathways and course placement adjustments, and
- implementation of proactive advising solutions such as Starfish or Navigate.

In June 2019, Minnesota State implemented Equity 2030 and set goals to reduce equity gaps in completion rates by 2030; the system and system institutions continue devoting resources to Equity 2030 work and improving completion rates for underrepresented students. More related to CTE programs, in Fall 2018, the Minnesota State Legislature started funding Workforce Development Scholarships for students. This program provides scholarships to students in high-demand educational programs that lead to employment in industries that overlap significantly with CTE programs, and the funding is time-limited, which may help promote more timely program completion among recipients. Finally, the new North Star Promise program begins in the 2024-25 school year, which is a last dollar scholarship that will be available to Minnesota residents who have a family adjusted gross income (AGI) below \$80,000 and attend a Minnesota public higher education institution. At this time, it's unclear how this new scholarship program will specifically impact CTE program enrollment and completion rates.

3P1 - In September 2023, Minnesota State applied the 2020 Nontraditional Occupations Crosswalk to state program data, with the impact being on grant year 4 forward. The update to the nontraditional designations resulted in improvement on the state's performance on this indicator by several percentage points for grant year 4/reporting year 2024 when performance rates were compared pre- and post-implementation. However, it's also important to note that grant year 4 data are still in-progress, so the final impact of this change remains to be seen. To account for improved performance observed so far, Minnesota added 2.5% to the 14.65% calculated minimum baseline (i.e., the average of the performance on 3p1 from grant years 2 and 3) to get a new baseline of 17.15%. This 2.5% increase was calculated by adjusting the average numerator from the two years used in establishing the baseline, along with the average denominator from the same period, to reflect the net change observed in both numerator and denominator for grant year 4/reporting year 2024, following the application of the 2020 Nontraditional Occupations Crosswalk. The new baseline was used as the starting point for establishing state SDPLs for grant years 5-8.

3c. 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).

Comparing Minnesota's SDPLs to Other States

In establishing the secondary and postsecondary SDPLs for grant years 5 through 8, Minnesota took into account how its SDPLs and performance on the indicators compares to SDPLs of other states. More detailed explanations of this state-to-state comparison, as well as additional comparisons, are provided below, first for secondary SDPLs and then for postsecondary SDPLs.

Secondary SDPL Comparisons

To inform the process of establishing secondary SDPLs for program years 2025-2028, Minnesota reviewed:

- MN trend performance data (modeled historical data and Perkins V).
- Enrollment data, both current students in the system as well as projected future high school enrollment based on current grade school enrollment trends. These data were leveraged to anticipate when the 'birthrate cliff/demographic cliff' would begin to have potential impacts on high school CTE initiatives and programming.
- Enrollment trends for both CTE participants & concentrators.
- Trends in achievement data
- Existing performance gaps, by disaggregated student groups.
- No recent attendance data were available for review due to COVID-19 disruptions in prior years.
- Perkins Collaborative Research Network (PCRN) performance rates and SDPLs from Year 1 and Year 2 for other states implementing similar performance indicator definitions, processes, and assessment where assessment information was provided; range of performance and ranking of Minnesota's outcomes in comparison with similar states and territories, as well as increases and decreases in performance across the two years of data where available. A different grouping of states emerged from the analysis of each performance indicator. The data available on the PCRN tool was very helpful and informative in the process of determining where we could potentially challenge ourselves and where Minnesota is already excelling.
- Reviewed multiple methodological options for determining SDPLs in the context of statistical soundness, current and future educational contexts, population forecasting, predetermined criteria for each performance indicator, as well as discussion and feedback from secondary consortium leaders.

Postsecondary SDPL Comparisons

To inform the process of establishing postsecondary SDPLs for program years 2025-2028, Minnesota reviewed:

Performance rates and SDPLs from Year 1 for other states in our ACTE region III
 (Iowa, Illinois, Indiana, Minnesota, Missouri and Wisconsin); range of performance

and SDPLs for each indicator for all 53 states and territories and where Minnesota fell in the range.

- Year 3 SDPLs from states with similar Perkins grant funding levels as MN (\$20-\$29M) from the September 27, 2023 Perkins Collaborative Convening.
- Minnesota State enrollment and completion data, specifically at system two-year institutions.
- Perkins participant and concentrator enrollment, indicator performance trend data, and general CTE enrollment/program completion data.
- Several methodologies for setting targets.
- Several methodologies for establishing local (consortium) targets after the state performance targets are established.
- Through the process of comparing both Minnesota's indicator SDPLs and actual performance with the state levels of performance and actual performance for other states, none of the differences observed suggested Minnesota's proposed SDPLs or methodology were inadequate or extreme. Where differences were observed, further exploration suggested the differences are likely due to the fact Minnesota uses a three-year cohort model for measuring accountability performance and many other states do not, or differences in the way the metrics were operationalized/defined.

SDPL Alignment with Federal and State Goals

As one of the few states submitting a WIOA Combined State Plan, Minnesota has taken a coordinated, unified approach to workforce development. The governor has proposed a "One Minnesota Plan" with a mission to improve the lives of all Minnesotans by working collaboratively to implement policies that achieve results benefitting all citizens. A key priority is for state agencies and community partners to collaborate to achieve common goals. We are doing that in Minnesota and submitting this revised Perkins State Plan as part of the Combined WIOA State Plan is a testament to that effort. Note the WIOA State Plan Goals for 2024-2027 and how they mirror Perkins V goals in many ways:

- Increase interagency coordination and alignment around shared goals, maximizing
 efficiency and coordination of workforce funding and programs and improving system
 integration, and creating a "no-wrong-door" approach for individuals or employers
 engaging in the workforce system.
- Build employer-led industry sector partnerships across the state to create or expand
 responsive and equitable workforce development programs and career pathways with
 embedded work-based learning or on-the-job training, including Registered
 Apprenticeships, focused on closing gaps in participation and representation based on
 race, ethnicity, disability, gender, veteran status, and age.
- Create a more inclusive, equitable, accessible, and proactive workforce system to serve all Minnesotans, preparing employers and the current and emerging workforce for the changing nature of work including new and emerging technology, changing labor market demand, and for the state's shifting demographics, including our new Minnesotans.

Perkins V goals include many of the same priorities, including interagency coordination and alignment around shared goals which is evident in our secondary/postsecondary partnerships throughout the state to promote CTE programs of study. Indeed, the partnership between Minnesota Department of Education and Minnesota State to bring secondary and postsecondary career and technical education programs and programs of study together is a perfect example of this.

Perkins V is deeply rooted in partnerships between business/industry and education through work-based learning opportunities provided for students, which is so important that Minnesota has chosen Work-based learning (5S3) as our Perkins quality indicator. As described earlier in this plan, Minnesota State has set a critical goal of eliminating the educational equity gaps at every Minnesota State college and university by 2030. This audacious goal requires systems and culture change, innovation, advocacy and leadership, and partners across the state to accomplish. All of this is supported by Perkins V, with its focus on reducing performance gaps for students, especially those who are members of special populations. Finally, through these various programs in the state, we are all working together for the same goal of meeting workforce needs of the present and the future.

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)

As part of the written response, include a description of any changes made to the State determined performance levels as a result of stakeholder feedback.

The SDPL public comment process for the original Minnesota Perkins V Four-Year Plan was documented in the *Minnesota Perkins V Public Comment Report*, February 10, 2020. The public comment period for the program year 2025-2028 SDPLs was completed along with the 2024 Minnesota State Plan Annual Revision public comment held December 8, 2023 through January 7, 2024, for a period no less than 30 days in length. (Note: Following these comments, see the information on the separate public comment period for the 2S3 SDPL).

18 total comments were received over the 30-day period for the three proposed questions. Details about each comment are displayed in the table below along with the response from MDE and/or Minnesota state staff.

Do the proposed state performance levels meet the requirements of the law?	
Feedback via Public Comment Process	State Response

Start time: 12/8/2023 3:25:51 PM; End time: 12/8/2023 3:38:49 PM; Director of Enrollment at Minnesota State Tech College "Yes."	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 12/8/2023 5:04:12 PM; End Time: 12/8/2023 5:30:22 PM; Teacher (K-12) "Knowing the COVID kids coming up, we are going to have a hard time meeting these performance levels. The level of apathy and lack of parental support have never been worse and I have been teaching for 33 years."	Thank you for your input. Minnesota Department of Education has a number of initiatives and opportunities in place to provide support for new CTE Teachers, as well as professional development opportunities for experienced CTE teachers. We hope these training opportunities will provide you with the support and assistance needed. We look forward to partnering with you in meeting the needs of all secondary CTE students.
Start time: 12/20/2023 8:33:10 AM; End Time: 12/20/2023 12:08:20 PM; School leader (College Administrators, Secondary Administrators, etc.) "4S1 focuses on non-trad (gender). Nontrad seems outdated as WIOA pulled it from their outcomes over 10 years ago. The focus is all on Performance Gaps and Special Populations. Should this indicator measure # of Spec Pops instead of non-trad?"	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level. Special Populations data are reported for every secondary and postsecondary performance indicator. Consortia, districts, and colleges are highly encouraged to review these data for local decision-making and strategic implementation purposes.
Start time: 12/20/2023 2:21:41 PM; End Time: 12/21/2023 9:10:59 AM; School leader (College Administrators, Secondary Administrators, etc.); "I believe so."	Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 12/21/2023 1:06:29 PM; End Time: 12/21/2023 1:13:13 PM; Parent (Guardian);Teacher (K-12);	Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this

"As mentioned previously, 3P1 and 3S1 are

referring to non-trad which is outdated. This indicator should measure all special pops."

is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level.

Special Populations data are reported for every secondary and postsecondary performance indicator. Consortia, districts, and colleges are highly encouraged to review these data for local decision-making and strategic implementation purposes.

Start time: 1/2/2024 12:42:34 PM; End Time: 1/2/2024 1:03:34 PM; School leader (College Administrators, Secondary Administrators, etc.); Thank you for your input. Minnesota looks forward to continuing to partner with our consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.

Start time: 1/7/2024 4:00:35 PM; End Time: 1/7/2024 4:23:29 PM;

Faculty (College and University); School leader

(College Administrators, Secondary

Administrators, etc.);

"Yes"

"These SDPLs are not wrong-headed but they all suffer from the "fox watching the henhouse" problem. For instance, in my university, we could increase our pass rates and graduation rates by inflating GPAs and course grades while ignoring each student's true performance (or lack of performance). Or we could ensure that our students perform well on standardized tests by teaching to the test and ignoring the finer points and principles of ethics, justice, and constitutional requirements. Or we could allow all law enforcement students to continue in the program (just as nursing could allow all students to continue in nursing or social work could allow all students to continue in social work, etc.) even when those students have unequivocally demonstrated repeatedly that

Thank you for your input. This comment recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level.

they are incapable to performing raceneutrally or with cultural celebration, or with equivalent service and justice for all, etc. Chasing statistics can be the worst yardstick on which to judge educational systems' true "performance" "impact" and "value" to society and to the communities served. Although we are in what one might call "the assessment age" in education, we must all bear in mind that quantitative assessment by the numbers often measures the wrong things, rewards unhelpful practices, and over-simplifies and frequently mischaracterizes what is truly happening "on the ground" in our state schools. Many of these SDPLs focus on near-term guests such as GRADUATE or GET YOUR FIRST JOB or GET THAT CERTIFICATE when I think education should deliver on the potential all students have to improve their career trajectories, impact their communities with skills, judgment, critical analysis learned in educational institution. Numbers too often lie - focus on real achievements instead. Further, every undergraduate institution across the US is scrambling for new enrollees/admits. Our path to success is to focus not on quantitative mirages but on qualitatively superlative content. For those in need, let's spend more public dollars on scholarships and budget grants to schools rather than over-populating the administrative suite of all these organizations and entities."

Do the proposed state performance levels support the improvement of all CTE concentrators, including subgroups of students as specified 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)?

Feedback via Public Comment Process	State Response
Start time: 12/8/2023 3:25:51 PM;	Thank you for your input. Minnesota looks
End time: 12/8/2023 3:38:49 PM;	forward to continuing to partner with our
	consortium leaders, institutions, business

Director of Enrollment at Minnesota State	and industry partners and community loaders
Tech College	and industry partners and community leaders and organizations to provide important CTE
"Yes."	
103.	training and opportunities for postsecondary students.
Start time: 12/8/2023 5:04:12 PM;	Thank you for your input. Minnesota looks
End time: 12/8/2023 5:30:22 PM;	forward to continuing to partner with our
Teacher (K-12);	consortium leaders, institutions, business
"No comments"	and industry partners and community leaders
	and organizations to provide important CTE
	training and opportunities for postsecondary
St. 11: 42/20/2022 0.22 40 414	students.
Start time: 12/20/2023 8:33:10 AM;	Thank you for your input. The students
End Time: 12/20/2023 12:08:20 PM;	referred to in the comment would be
School leader (College Administrators,	considered "Continuing" within the current
Secondary Administrators, etc.)	1S1 denominator definition. All CTE
"1S1 - Many of our CTE classes have students	Concentrators prior to graduation are
with IEPs that may continue their education	included in the denominator, only those who
in our transitional programs for ages 18-22. It	graduate within four years are included in
would be ideal if either these students were	the numerator. The Perkins V legislation
pulled from this denominator, or we tracked	provides an option to report graduation
these students 6 years later."	beyond 4 years; however, the secondary
	technical advising committee opted not to be
	federally accountable for these data.
	Although these data are not part of Perkins
	state plan for federal accountability
	purposes, we can make a note to discuss the
	possibility of developing data reports at
	future leadership meetings, in support of
	local programs and continuous improvement.
Start time: 12/20/2023 2:21:41 PM;	Thank you for your input. This comment
End Time: 12/21/2023 9:10:59 AM;	recommends a change(s) to the legislative
School leader (College Administrators,	definition of a performance indicator(s); this
Secondary Administrators, etc.);	is not something we can change at the state
"No, they do not. We would need to be more	level, although we can note these for
accountable with non-trad represented by	leadership to bring forward in future
our special populations definitions, not just	leadership discussions about Perkins
gender."	legislation at the federal level.
	Special Populations data are reported for
	every secondary and postsecondary
	performance indicator. Consortia, districts,
	and colleges are highly encouraged to review

	these data for local decision-making and
	strategic implementation purposes.
Start time: 1/2/2024 12:42:34 PM;	Thank you for your input. Minnesota looks
End Time: 1/2/2024 1:03:34 PM;	forward to continuing to partner with our
School leader (College Administrators,	consortium leaders, institutions, business
Secondary Administrators, etc.);	and industry partners and community leaders
"Yes"	and organizations to provide important CTE
	training and opportunities for postsecondary
	students.
Start time: 1/7/2024 4:00:35 PM;	Thank you for your input. This comment
End Time: 1/7/2024 4:23:29 PM;	recommends a change(s) to the legislative
Faculty (College and University);School leader	definition of a performance indicator(s); this
(College Administrators, Secondary	is not something we can change at the state
Administrators, etc.);	level, although we can note these for

leadership to bring forward in future leadership discussions about Perkins

legislation at the federal level.

"See my comments to question 3"

Do the proposed state performance levels support the needs of the local education and		
business co	ommunity?	
Feedback via Public Comment Process	State Response	
Start time: 12/8/2023 3:25:51 PM;	Thank you for your input. Minnesota looks	
End time: 12/8/2023 3:38:49 PM;	forward to continuing to partner with our	
Director of Enrollment at Minnesota State	consortium leaders, institutions, business	
Tech College	and industry partners and community leaders	
"Yes."	and organizations to provide important CTE	
	training and opportunities for postsecondary	
	students.	
Start time: 12/8/2023 5:04:12 PM;	Thank you for your input. Minnesota looks	
End time: 12/8/2023 5:30:22 PM;	forward to continuing to partner with our	
Teacher (K-12);	consortium leaders, institutions, business	
"I think it matters less about the	and industry partners and community leaders	
performance level than the ability of the	and organizations to provide important CTE	
student to want to learn, be able to take	training and opportunities for our CTE	
criticism, show up on time, realize that hard	teachers and administrators in support of	
work is what gets you to where you want to	students gaining both valuable marketplace	
be, and have a good attitude towards peers	skills and employable skills leading to high	
and adults."	wage and in-demand careers.	
Start time: 12/21/2023 1:06:29 PM;	Thank you for your input. This comment	
End Time: 12/21/2023 1:13:13 PM;	recommends a change(s) to the legislative	
Parent (Guardian);Teacher (K-12);	definition of a performance indicator(s); this	
"No as noted previously, 3P1 and 3S1 are not	is not something we can change at the state	
measuring all special pops."	level, although we can note these for	

	leadership to bring forward in future leadership discussions about Perkins legislation at the federal level.
Stort time: 1/2/2024, 12:42:24 DM.	Special Populations data are reported for every secondary and postsecondary performance indicator. Consortia, districts, and colleges are highly encouraged to review these data for local decision-making and strategic implementation purposes.
Start time: 1/2/2024 12:42:34 PM; End Time: 1/2/2024 1:03:34 PM;	Thank you for your input. Minnesota looks forward to continuing to partner with our
School leader (College Administrators, Secondary Administrators, etc.); "Yes"	consortium leaders, institutions, business and industry partners and community leaders and organizations to provide important CTE training and opportunities for postsecondary students.
Start time: 1/7/2024 4:00:35 PM;	Thank you for your input. This comment
End Time: 1/7/2024 4:23:29 PM; Faculty (College and University);School leader (College Administrators, Secondary Administrators, etc.); "See my comments to question 3"	recommends a change(s) to the legislative definition of a performance indicator(s); this is not something we can change at the state level, although we can note these for leadership to bring forward in future leadership discussions about Perkins legislation at the federal level.

Public Comment Response for 2S3, Academic Proficiency in Science -- A separate public comment process was held July 15th through August 14th, 2024, for the 2S3 SDPL. The reason for this separate public comment process was because a proposed 2S3 SDPL had not been included in the original SDPL public comment period held December 8 through January 7, 2024. Minnesota had not set an SDPL for the 2S3 indicator since the inception of Perkins V due to the process for conducting the science assessment in the state. Minnesota has not historically offered testing for academic proficiency in Science in a consistent manner throughout the state. Although the assessment is standardized, the grade in which students complete the assessment is not. Students sit for the science assessment in either 9th or 10th grade depending upon when they complete the Life Sciences requirements in their school districts. With this revision to the Minnesota State Perkins Plan, OCTAE will no longer allow for this exception. Following consultation with OCTAE staff, the decision was made to set an SDPL for 2S3 based on the previous year's statewide data from the science assessment. Results from the 2S3, Academic Proficiency in Science, public comment period are as follows:

Does the proposed state performance level for Science (2S3) meet the requirements of the law?			
Feedback via Public Comment Process	State Response		
Start time 7/16/2024 1:25:28 PM End time 7/16/2024 1:27:53 PM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.		
Start time 7/17/2024 8:20:36 AM End time 7/17/2024 8:22:59 AM Teacher (K-12); Parent (Guardian); "No."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.		
State Time 7/17/2024 1:22:36 PM End Time 7/17/2024 1:24:35 PM Teacher (K-12); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.		
Start Time 7/17/2024 3:21:44 PM End Time 7/17/2024 3:26:27 PM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.		
Start Time 7/18/2024 6:27:52 AM End Time 7/18/2024 6:40:28 AM Faculty (College and University); "The law was not provided in any of the documents that we were given." Start Time 7/18/2024 10:28:10 AM	The title of the Perkins V Act, Strengthening Career and Technical Education for the 21st Century Act (Perkins V Act) was the hyperlink to the legislation. The link to the legislation was provided on the same page, directly above the Public Comment Notice. Thank you for your input. Minnesota		

Teacher (K-12); Faculty (College and University);Employer; Parent (Guardian);School leader (College Administrators, Secondary Administrators, etc.); "Yes."	continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/18/2024 10:47:17 AM End Time 7/18/2024 10:50:58 AM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 12:00:09 PM End Time 7/19/2024 12:02:20 PM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 1:39:56 PM End Time 7/19/2024 1:43:05 PM School leader (College Administrators, Secondary Administrators, etc.); "It appears to."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/26/2024 6:55:09 AM End Time 7/26/2024 7:06:33 AM School leader (College Administrators, Secondary Administrators, etc.); "It appears to meet the requirements."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/26/2024 8:18:20 AM End Time 7/26/2024 8:50:34 AM	Only students who participated in the academic achievement assessment are included in the federal ESSA reporting for science. It is anticipated that Perkins

Teacher (K-12); School leader (College reporting will follow similar guidelines. Administrators, Secondary Administrators, Meaning, Opt-Out students will not be etc.); Parent (Guardian); included in the 2S3: Science assessment "Yes, it meets the letter of the law, EXCEPT in calculation for student outcome performance my district there is a strong "opt out of within Perkins federal reporting. Recently testing" contingency amongst families. arrived students who are identified as English When these families opt out, it has a learners (RAEL), are required to participate in negative impact on our testing score the assessment, however, their scores are averages as it has historically been measured exempted from counting in the federal ESSA as a zero. There is also concern that the test (North Star) accountability calculations across all academic assessments. Students does not accommodate the rising number of immigrant students in our district that would with limited or interrupted formal education not have had a K-12 learning experience (SLIFE) students must also be identified as associated with MN Academic standards." English learners to qualify SLIFE—however, students with this designation are often not recently arrived students because the SLIFE designation can continue forward several years, whereas RAEL only applies to one year. Start Time 7/26/2024 11:43:54 AM Thank you for your input. Minnesota End Time 7/26/2024 11:50:26 AM Department of Education looks forward to Teacher (K-12); continuing to partner with our students, "Yes." teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work. Start Time 7/30/2024 8:19:03 AM Thank you for your input. Minnesota End Time 7/30/2024 8:25:08 AM Department of Education looks forward to School leader (College Administrators, continuing to partner with our students, Secondary Administrators, etc.); teachers, consortium leaders, business and "It appears to." industry partners and community leaders, and postsecondary partners, in this important work. Start Time 7/30/2024 10:53:13 AM The Every Student Succeeds Act (ESSA) and End Time 7/30/2024 11:07:50 AM Minnesota Statutes 2022, section 120B.30, Specialized instructional support personnel; require that all students be assessed annually "This is not a great measurement as MCAs in reading, mathematics, and science. To are not required for students to take in MN. meet these requirements, most students It also is not taken seriously by students, so take the Minnesota Comprehensive scores would be severely unreliable. Based Assessments (MCAs), but students who only on the percentages above, it does meet receive special education services and meet

the requirement, however this data is not complete, nor reliable."

the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS. Similarly, ESSA and Minnesota Statutes 2022, section 124D.59, require that all English learners be assessed in English language proficiency. To meet these requirements, most English learners take the ACCESS for ELLs (ACCESS), but students who receive special education services and meet the participation criteria may take the Alternate ACCESS for ELLs (Alternate ACCESS) instead. For all statewide assessments, students enrolled any time during a testing window are expected to participate, and districts must attempt to test all students who are enrolled. For additional details, please see Participation Calculations for Statewide Assessments.

Start Time 7/31/2024 9:05:04 AM End Time 7/31/2024 9:14:36 AM Faculty (College and University);

"The denominator section of the definitions states the "assessment scores were included in the State's ESSA computation." Science in not included in the ESSA computation."

The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30, require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS. Although there are additional criteria for reporting Math and Reading/ELA assessment outcomes for ESSA and Minnesota's North Star plan, all valid scores for academic achievement in Math, Reading/ELA, and Science are reported through the EdFacts system to our federal partners.

Does the proposed state-determined performance level in Science (2S3) support the needs of the local education and business community?

Feedback via Public Comment Process

State Response

Start time 7/16/2024 1:25:28 PM End time 7/16/2024 1:27:53 PM School leader (College Administrators, Secondary Administrators, etc.); "No, nobody cares about science MCA."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 7/17/2024 8:20:36 AM End time 7/17/2024 8:22:59 AM Teacher (K-12); Parent (Guardian); "No."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
State Time 7/17/2024 1:22:36 PM End Time 7/17/2024 1:24:35 PM Teacher (K-12); "No."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/17/2024 3:21:44 PM End Time 7/17/2024 3:26:27 PM School leader (College Administrators, Secondary Administrators, etc.); "Somewhat higher aim would better meet the need."	Thank you for your recommendation. We will consider this. We look forward to continuing to partner with our consortium leaders, teachers, business and industry partners and community leaders, and students in this important work.
Start Time 7/18/2024 6:40:28 AM End Time 7/18/2024 6:40:28 AM Faculty (College and University); "No, I have been teaching a sophomore college-level science course at a Community College for over 15 years. The number of students who have supposedly completed at least year of Biology and semester of chemistry who can't take notes, can't use a textbook (because they never had to actually learn anything), or worse can't even read or write a simple email has been increasing	Thank you for your contribution. The 2019 Minnesota Academic Standards in Science were adopted in 2021 and are anticipated to be fully implemented in the 2024-2025 school year. CTE programs areas most aligned with the updated Science standards include Agriculture, Food, and Natural Resources (AFNR) and Health Science. Currently, there are 211 state-approved AFNR programs and 72 state-approved Health Science programs serving high school students across Minnesota.

	T
dramatically. Much of the state's High School science courses in the Twin Cities seem to be a total farce. Yes, they might be great to teach non-science majors about science. But as CTE they should not pass."	
Start Time 7/18/2024 10:28:10 AM End Time 7/18/2024 10:30:41 AM Teacher (K-12); Faculty (College and University); Employer; Parent (Guardian); School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/18/2024 10:47:17 AM End Time 7/18/2024 10:50:58 AM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 12:00:09 PM End Time 7/19/2024 12:02:20 PM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/19/2024 1:39:56 PM End Time 7/19/2024 1:43:05 PM School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/21/2024 5:36:51 AM End Time 7/21/2024 5:39:07 AM Teacher (K-12); "I think it would be beneficial to allow students to meet graduation requirements	Within Career and Technical Education, there are possibilities within credit equivalencies at the local district level. Districts are currently implementing science for graduation requirements through CTE courses. For more

for science by taking applied science classes or Career & Technical Education classes."	information on the process, please see the <u>Career and Technical Education (CTE) Credit</u> <u>Equivalency</u> document posted on the Minnesota Department of Education's CTE main page and the <u>Graduation Requirements</u> website.
Start Time 7/26/2024 6:55:09 AM End Time 7/26/2024 7:06:33 AM School leader (College Administrators, Secondary Administrators, etc.); "I question aligning Science MCA scores with CTE performance since only a small percentage of CTE courses address the science standards."	Thank you for your comment. The 2019 Minnesota Academic Standards in Science were adopted in 2021, and are anticipated to be fully implemented in the 2024-2025 school year. CTE programs areas most aligned with the updated Science standards include Agriculture, Food, and Natural Resources (AFNR) and Health Science. Currently, there are 211 state-approved AFNR programs and 72 state-approved Health Science programs serving high school students across Minnesota.
Start Time 7/26/2024 8:18:20 AM End Time 7/26/2024 8:50:34 AM Teacher (K-12); School leader (College Administrators, Secondary Administrators, etc.); Parent (Guardian); "Though I agree that science is an important content area for all students and applies in various applications for CTE participants and concentrators, the performance level of 41.84% as a baseline is 11.62% higher than actual performance average over the past 10 years (omitting 2020 covid year) and a 7.84% increase over our previous years performance. Expecting CTE to be able to dramatically influence a 11.62% or 7.84% increase in performance in the first year of implementation seems excessive. Question: will the starting SDPL be customized for each Perkins consortia?"	Federal guidance for setting State Determined Performance Levels (SDPL) is provided in the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). The goal is meaningful progress based on current performance outcomes at both the state and local levels. Trend data for all local Perkins consortia in Minnesota are taken into consideration, as well as the timeline for implementation of newly adopted standards and updated assessments.
Start Time 7/30/2024 8:19:03 AM End Time 7/30/2024 8:25:08 AM	Thank you for your comment and input. The communication strategy to inform and invite Public Comment around the State

School leader (College Administrators, Secondary Administrators, etc.); "How can this be determined by the information provided? What business community needs and input was provided to support this?"	Determined Performance Level for academic proficiency in science involved notifying all business sectors and educational partners of the opportunity to provide input.
Start Time 7/30/2024 10:53:13 AM End Time 7/30/2024 11:07:50 AM Specialized instructional support personnel; "No. Again, since the MCAs are not required and not taken seriously by students, we have unreliable data to identify if this is a tool that industry or post-secondary is interested in capturing for a performance indicator."	The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30, require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS.
Start Time 7/31/2024 9:05:04 AM End Time 7/31/2024 9:14:36 AM Faculty (College and University); "Maybe."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.

Does the proposed state-determined performance level for Science (2S3) support the improvement of all CTE concentrators, including subgroups of students as specified in Section 1111(c)(2)(B) of the Elementary and Secondary Education Act of 1965 and special populations, as described in Section 3(48)?	
Feedback via Public Comment Process	State Response
Start time 7/16/2024 1:25:28 PM	Thank you for your input. Minnesota
End time 7/16/2024 1:27:53 PM School leader (College Administrators,	Department of Education looks forward to continuing to partner with our students,
Secondary Administrators, etc.); "Sure."	teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this
Start time 7/17/2024 8:20:36 AM End time 7/17/2024 8:22:59 AM	Thank you for your input. Minnesota Department of Education looks forward to

Teacher (K-12);Parent (Guardian); "No."	continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
State Time 7/17/2024 1:22:36 PM End Time 7/17/2024 1:24:35 PM Teacher (K-12); "Idk."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start Time 7/17/2024 3:21:44 PM End Time 7/17/2024 3:26:27 PM School leader (College Administrators, Secondary Administrators, etc.); "I do not see factors that call out subgroups in the Science language/performance level and thus am unaware of any specifics related to special populations."	Student outcomes on all academic proficiency (Math, Reading/ELA, and Science) are required to be publicly reported according to federally defined student groups, both for ESEA (Section 1111(h)(1)(C)(ii) and Perkins V (Section 113(3)(A)(III)(bb)).
Start Time 7/18/2024 6:40:28 AM End Time 7/18/2024 6:40:28 AM Faculty (College and University); "Why is there not a link to this act in the introduction/background? Clearly you mainly want input from High School teachers and not business or college teachers."	The title of the Perkins V Act, Strengthening Career and Technical Education for the 21 st Century Act (Perkins V Act) was the hyperlink to the legislation. The link to the legislation was provided on the same website, directly above the Public Comment Notice. Minnesota Department of Education welcomes and appreciates comments from those interested in contributing to the process. Thank you for your input.
Start Time 7/18/2024 10:28:10 AM End Time 7/18/2024 10:30:41 AM Teacher (K-12); Faculty (College and University); Employer; Parent (Guardian); School leader (College Administrators, Secondary Administrators, etc.); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.

Start Time 7/18/2024 10:47:17 AM Thank you for your input. Minnesota End Time 7/18/2024 10:50:58 AM Department of Education looks forward to School leader (College Administrators, continuing to partner with our students, Secondary Administrators, etc.); teachers, consortium leaders, business and "Yes." industry partners and community leaders, and postsecondary partners, in this important work. Start Time 7/19/2024 1:39:56 PM Thank you for your input. Minnesota End Time 7/19/2024 1:43:05 PM Department of Education looks forward to School leader (College Administrators, continuing to partner with our students, Secondary Administrators, etc.); teachers, consortium leaders, business and "Appears to." industry partners and community leaders, and postsecondary partners, in this important work. Start Time 7/26/2024 6:55:09 AM Thank you for your input. Minnesota End Time 7/26/2024 7:06:33 AM Department of Education looks forward to School leader (College Administrators, continuing to partner with our students, Secondary Administrators, etc.); teachers, consortium leaders, business and "Unclear." industry partners and community leaders, and postsecondary partners, in this important work. Start Time 7/26/2024 8:18:20 AM The Perkins V legislation requires the state to End Time 7/26/2024 8:50:34 AM make meaningful progress toward improving Teacher (K-12); School leader (College the performance of all career and technical Administrators, Secondary Administrators, education students, including the subgroups etc.); Parent (Guardian); of students described in ESSA (Section "Historically all subgroups, except white, and 1111(h)(1)(C)(ii) and Perkins V (Section native Hawaiian/pacific islander, in my 113(3)(A)(III)(bb)). The updated Minnesota consortia have NEVER reached a 41.84% Comprehensive Assessment (MCA) and average on the MN Science MCA. I'm alternative MCA (for qualifying students) was concerned that the exam that is being used created to assess comprehension of the to measure this metric may have "lived newly adopted science standards. Individual experience bias" unconsciously embedded in

assessment items were piloted and validated with members from all legislatively defined student groups such that the assessment is fair and equitable for all Minnesota students and student groups.

Start Time 7/30/2024 8:19:03 AM End Time 7/30/2024 8:25:08 AM

the questions."

The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30,

School leader (College Administrators, Secondary Administrators, etc.);

"The date used isn't accurate. MCA testing is optional. How can an optional assessment be used to determine proficiency?"

require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS. For all statewide assessments, students enrolled any time during a testing window are expected to participate, and districts must attempt to test all students who are enrolled. For additional details, please see Participation Calculations for Statewide Assessments.

Start Time 7/30/2024 10:53:13 AM End Time 7/30/2024 11:07:50 AM Specialized instructional support personnel; "No. The data collected will not show an accurate representation of ALL students (including historically underrepresented students) and since the test is not required, data will be incomplete and unreliable."

The Every Student Succeeds Act (ESSA) and Minnesota Statutes 2022, section 120B.30, require that all students be assessed annually in reading, mathematics, and science. To meet these requirements, most students take the Minnesota Comprehensive Assessments (MCAs), but students who receive special education services and meet the Minnesota Test of Academic Skills (MTAS) eligibility requirements may take the MTAS. For all statewide assessments, students enrolled any time during a testing window are expected to participate, and districts must attempt to test all students who are enrolled. For additional details, please see Participation Calculations for Statewide Assessments.

Start Time 7/31/2024 9:05:04 AM End Time 7/31/2024 9:14:36 AM Faculty (College and University); "There is not enough information to make that determination."

Thank you for your comment. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.

<u>State Determined Performance Level (SDPL) Public Comment Process for Grant Year 6 (2025-2026)</u>

Minnesota developed revised SDPLs for Grant Year 6, covering program year 2025-2026, in accordance with OCTAE Program Memorandum 25-1. The methodology used to establish the SDPLs follows the guidelines in Perkins V Sec. 113 (b)(3)(A)(III) which require the SDPLs for each indicator to be higher than the average actual performance of the two most recently completed program years (grant years 3 and 4). The legislation also requires the SDPLs to show continuous meaningful progress (i.e., not remain flat from year to year).

A public comment period for consideration of the revised SDPLs was held March 7, 2025 through April 7, 2025. A total of 21 comments were received over the 30-day period for the three proposed questions. Details about each comment are displayed in the table below along with the response from Minnesota Department of Education and/or Minnesota state staff.

Do the proposed state-determined performance levels meet the requirements of the law?		
Feedback via Public Comment Process	State Response	
Start time 3/10/2025 8:44:50 AM End time 3/10/2025 8:46:16 AM Teacher (K-12);Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.	
Start time 3/10/2025 8:48:12 AM End time 3/10/2025 8:54:44 AM Teacher (K-12);Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.	
Start time 3/10/2025 10:18:04 AM End time 3/10/2025 10:28:01 AM Teacher (K-12); "How can 90+ percent graduate but Math and English scores are much are much lower. Does Perkins V even talk about graduation standards?"	Thank you for your input. Perkins V includes a secondary accountability indicator for the 4-year Graduation Rate in alignment with ESEA performance measures. Math, Reading, and Science performance indicators are also assessed. In Minnesota, students are required to complete two kinds of requirements by the time they graduate. Students must: • Satisfactorily complete all state academic standards and, for example in the case of	

	Career and Technical Education, local academic standards for coursework where state standards do not apply Minnesota Statutes 2024, Section 120B.022. • Satisfactorily complete the state credit requirements under Minnesota Statutes 2022, section 120B.024.
Start time 3/10/2025 3:09:07 PM End time 3/10/2025 3:15:35 PM Teacher (K-12); "I think they did the best they could do. The desire of the students to learn the material must be considered. Some of my kids LOVE the creating, but not the reading about the creating."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/11/2025 7:46:44 AM End time 3/11/2025 7:54:57 AM Teacher (K-12); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/13/2025 10:11:17 AM End time 3/13/2025 2:05:00 PM Teacher (K-12); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 4/3/2025 10:17:54 AM End time 4/3/2025 10:25:09 AM Teacher (K-12); Faculty (College and University); Parent (Guardian); "No. In order to graduate from a MN high school there are several course requirements that are not even addressed much less meet the requirements of the law."	Thank you for your input. In Minnesota, students are required to complete two kinds of requirements by the time they graduate. Students must: • Satisfactorily complete all state academic standards and, for example in the case of Career and Technical Education, local academic standards for coursework where state standards do not apply Minnesota Statutes 2024, Section 120B.022.

Satisfactorily complete the state credit
requirements under Minnesota Statutes
2022, section 120B.024.

Do the proposed state-determined performance levels support the improvement of all CTE concentrators, including subgroups of students as specified in Section 1111(c)(2)(B) of the Elementary and Secondary Education Act of 1965 and special populations, as described in Section 3(48)?

Section 3(48)?	
Feedback via Public Comment Process	State Response
Start time 3/10/2025 8:44:50 AM End time 3/10/2025 8:46:16 AM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/10/2025 8:48:12 AM End time 3/10/2025 8:54:44 AM Teacher (K-12); Parent (Guardian); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/10/2025 10:18:04 AM End time 3/10/2025 10:28:01 AM Teacher (K-12) "Instead of making us look up the section maybe you could put it in the question."	Thank you for your input. Minnesota Department of Education apologizes for any inconveniences you experienced and will take your recommendation under advisement within future public comment posts.
Start time 3/10/2025 3:09:07 PM End time 3/10/2025 3:15:35 PM Teacher (K-12); "Support is great. In a small school, we have few subgroups. We also have much fewer resources. The focus needs to be on how to get us industry standard equipment and training on how to use it, in partnership with local industry."	The purposes of the Perkins V grant include assisting with the needs you have expressed. Federal resources are dispersed from the state to local Perkins consortia whose role is to oversee how resources are spent on innovative equipment and teachers' professional development needs in alignment with local business and industry.

	Local needs are assessed on a biennial basis as part of a Comprehensive Local Needs Assessment (CLNA) process which includes data and information from several sources. Programmatic decisions and budgeting priorities are based on CLNA results. Positive education and career outcomes for all Minnesota students is important to the future of our community as well as state and local economies.
Start time 3/11/2025 7:46:44 AM End time 3/11/2025 7:54:57 AM Teacher (K-12); "Yes."	Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.
Start time 3/13/2025 10:11:17 AM End time 3/13/2025 2:05:00 PM Teacher (K-12); "The information above did not lead me to the specific section you wanted me to review. Your nomenclature didn't align easily with the summary of the ACT that I found at this URL: https://www.ed.gov/sites/ed/files/documents/essa-act-of-1965.pdf	The Elementary and Secondary Education Act language is in reference to the race/ethnic student groups as well as special populations. Within the public comment website posted from March 7-April 7, 2025, a direct link to "Accountability Resources" was also provided; information about these student groups continues to be available Minnesota State - Consortium Resources. Minnesota Department of Education appreciates your feedback and will ensure this information is more clear and more readily available in future Public Comment opportunities.
Start time 4/3/2025 10:17:54 AM End time 4/3/2025 10:25:09 AM Teacher (K-12); Faculty (College and University); Parent (Guardian);	How Perkins V funding is apportioned at the local level in support of grant initiatives is decided by individual consortia. Across all Perkins consortia, it is entirely possible to support the

"No. If all performance levels were actually supported then yes, they would support the improvement of CTE concentrators. However, only the technical side of this program is supported. There are no funds given to help improve reading or math skills."

integration of State Technical Reading and Math content standards into local Career and Technical Education frameworks, develop innovative handson classroom projects, and support teachers' professional development needs. Minnesota Department of Education highly encourages this work and is in support of these efforts.

Do the proposed state performance levels support the needs of the local			
education and business comm	education and business community?		
Feedback via Public Comment	State Response		
Process			
Start time 3/10/2025 8:44:50	Thank you for your input. Minnesota Department of		
AM	Education looks forward to continuing to partner with		
End time 3/10/2025 8:46:16 AM	our students, teachers, consortium leaders, business and		
Teacher (K-12); Parent	industry partners and community leaders, and		
(Guardian);	postsecondary partners, in this important work.		
"Yes."			
Start time 3/10/2025 8:48:12	As we know, there are many valuable construction-		
AM	related projects implemented in high school classroom		
End time 3/10/2025 8:54:44 AM	settings, the state will take your perspective under		
Teacher (K-12); Parent	advisement. Currently, high school students have access		
(Guardian);	to engage in this type of employment or internship		
"No - Construction is being	within the construction industry when the experience		
underrepresented because they	takes place in an office setting, headquarters, and		
cannot participate in WBL on a	possibly a training facility rather than on or about a		
Construction Site. Construction	construction site. These opportunities allow students to		
Courses should be counted as	be involved in learning more about the industry as well		
WBL Experiences because this is	as maintain safety needs.		
the only way for them to get the			
experience."			
0			
Start time 3/10/2025 10:18:04	Thank you for your recommendation. Across all Perkins		
AM	consortia, it is entirely possible for local consortia to		
End time 3/10/2025 10:28:01	allocate financial resources toward the integration of		
AM	State Reading and Math content standards into local		
Teacher (K-12)	Career and Technical Education frameworks, develop		
"No. Maybe the state should look	innovative hands-on classroom projects that		
at how they distribute funds and	demonstrate mastery of these content area standards		
align closer to the federal law.	and to develop these classroom projects in collaboration		
MN performance in Math and	with business and industry/postsecondary partners, as		

English is bad. Why not have high expectations and if a student can't meet, they don't graduate. When only 50% can meet English standards and 30% meet Math how does that help the Secondary education or the business community!"

well as support teachers' professional development, as needed. Minnesota Department of Education highly encourages this work and is in full support of these ongoing local efforts.

Start time 3/10/2025 3:09:07 PM End time 3/10/2025 3:15:35 PM Teacher (K-12);

"I have a few students that may be below these goals and yet would meet the needs of the business community. So, where do those students fit in the survey?" Thank you for your comment. The goal of the state's continuous improvement efforts is to provide support toward consistently improving both students' academic and career outcomes. It is encouraging to hear that students are meeting local business community needs even as we strive to make greater gains in our students' academic outcomes. It is our hope that the state targets will be both meaningful and attainable.

Start time 3/11/2025 7:46:44 AM End time 3/11/2025 7:54:57 AM Teacher (K-12); "Yes." Thank you for your input. Minnesota Department of Education looks forward to continuing to partner with our students, teachers, consortium leaders, business and industry partners and community leaders, and postsecondary partners, in this important work.

Start time 3/13/2025 10:11:17 AM

End time 3/13/2025 2:05:00 PM Teacher (K-12);

"I concur that Work-Based
Learning should be an SDPL
metric for Perkins, but I think
that requiring a communitybased internship (9090-97)
versus Career Seminar (9090-95)
is unrealistic with the additions of
graduation requirements that
have been added the past few
years. Many students don't have
time in their high school journey
to take both classes, especially if
each is a minimum of a semesterlong commitment. I am also

Thank you for your response. We are grateful to have experienced an ongoing increase in the percentage of students engaging in Work-Based Learning (WBL) training courses (course 97) within Minnesota. Many districts have begun to offer Career Seminar (course 95) content alongside the work experience (course 97) opportunities for the reasons you have outlined; their programs and students have been very successful in meeting the goals of their local Perkins plans.

There is no language in either the Perkins or ESEA legislation stating that "opt out" scores need to be included in the Perkins accountability calculation for Academic Achievement in Reading, Math, or Science. For this reason, CTE Concentrators who would otherwise earn a zero on high academic achievement assessments are not included in either the numerator or denominator of Perkins accountability outcomes. However, it is also

concerned that we continue to use MCA test results as a metric when so many families have begun to "opt out" of these tests and an opt-out by a CTE concentrator affects our metrics negatively."

important to keep in mind that Minnesota Statutes, section 120B.30, subdivision 1 (p), defines career and college readiness (CCR) as follows:

"For purposes of statewide accountability, career and college readiness means a high school graduate has the knowledge, skills, and competencies to successfully pursue a career pathway, including postsecondary credit leading to a degree, diploma, certificate, or industry-recognized credential and employment. Students who are career and college ready can successfully complete credit-bearing coursework at a two- or four-year college or university or other credit-bearing postsecondary program without need for remediation."

In alignment with Minnesota's CCR initiative, CCR scores are provided for students who take the grades 10 and 11 Reading and Mathematics Minnesota Comprehensive Assessments-Series III (MCA-III) assessments. The CCR goal scores act as cut scores for career and college readiness based on students' performance on the MCA-III.

The Individual Student Reports (ISRs) for the grade 10 Reading and grade 11 Mathematics MCA-III include a section describing the student's MCA-III score in context of the CCR goal score for that subject. The MCA-III scores and CCR goal scores are on the same scale, and an MCA-III score at or above the goal score is considered on track to demonstrate career and college readiness in the corresponding subject on a college entrance exam at the end of grade 11. Additional details regarding the Technical Report for Career and College Readiness can be found at:

https://education.mn.gov/MDE/dse/test/Tech/index.htm

Start time 4/3/2025 10:17:54 AM

End time 4/3/2025 10:25:09 AM Teacher (K-12); Faculty (College and University); Parent (Guardian);

"No. They are levels. Schools need actual support in order to

Perkins V funding is apportioned at the consortium level in support of grant initiatives according to locally determined needs. Across all Perkins consortia, it is entirely possible to support the integration of State Technical Reading and Math content standards into local Career and Technical Education frameworks, develop innovative hands-on classroom projects, and support teachers' professional development needs. Minnesota

meet anything and that support is only being given to our technical courses. Students need communication skills and basic math skills in order to be successful in a career outside of high school."

Department of Education (MDE) highly encourages this work and is in support of these efforts. MDE also encourages students to pursue Work Based Learning opportunities as part of state-approved Perkins-CTE programs which further assists students toward refining communication and employability skills.

5. 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)

As part of the written response, and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP), 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.

Secondary

Minnesota Department of Education continues to develop dynamic reports which allow consortium leaders and district staff to quickly identify any gaps in performance that may exist between federally reported student groups. These reports are updated annually in order to monitor trends in performance as well as progress toward closing any existing gaps. Webinars, group presentations, and individual assistance are provided in order to ensure that secondary consortium leaders understand the measures used within the reports as well as how to interpret the information. The goal of providing this assistance is to ensure that consortium leaders are able to facilitate conversations with CTE teachers and district administrators so that meaningful gaps can be identified and are actionable.

Challenges in identifying performance gaps are outlined in the postsecondary section and also apply to the secondary reports. Solutions to these issues will be addressed by providing

consortium leaders with a 'heat map' of performance gap trends, organized by performance indicator and disaggregated student group. Larger, more meaningful, performance gaps will be highlighted for ease in interpreting the information and consortium leaders will be given the opportunity to receive technical support and assistance as needed. We feel that providing this information in this format is critical for use in prioritizing the needs and work around reducing and eliminating performance gaps, most especially in preparation for engaging in CLNA work and strategic programmatic decision making.

Postsecondary

Minnesota State reviews postsecondary reports available at the state and consortium level that compare performance on the indicators to the SDPLs to identify subgroups, special populations, and/or clusters that have gaps in performance compared to the SDPLs. However, due to the COVID-19 pandemic, Minnesota State requested and received OCTAE approval to adjust postsecondary SDPLs for grant years 2 through 4 in spring/summer 2022. Minnesota State expected the COVID-19 pandemic to negatively impact performance on the postsecondary indicators for grant years 2 through 4, so consequently lowered the SDPLs to reflect this negative impact throughout the remaining years of the grant (through year 4). While the Perkins V legislation requires states to address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V each of the plan years (i.e., requiring comparing performance on the indicators to the SDPLs), identifying gaps in performance using only this method can lead to interpreting decreases in gaps as being caused by improving performance when, in reality, decreases in gaps could actually be due to the adjustment/lowering of the SDPLs for grant years 2 through 4. To remedy this possible misinterpretation when analyzing gaps data, Minnesota also prepares and reviews reports at the state and consortium level that compare performance on the indicators to the performance of all CTE Concentrators. This comparison allows the state or consortia to identify additional subgroups, special populations, and/or clusters that have gaps in performance compared to the performance of all concentrators measured for each indicator, not just the SDPLs established for each metric.

At the state level, after review of the data, the postsecondary data team summarizes and reviews the findings with the state CTE leadership team to assist them in identifying special populations and demographic groups that have persistent and meaningful gaps in performance on the indicators. The state leadership team then identifies the additional actions the state will take to eliminate these disparities or gaps.

Priorities

Both Minnesota State and the Minnesota Department of Education are committed to addressing disparities or gaps in performance of our students. MDE's equity statement follows: Educational equity is the condition of justice, fairness, and inclusion in our systems of education so that all students have access to the opportunities to learn and develop to their fullest potential. The pursuit of educational equity recognizes the historical conditions and barriers that have prevented opportunity and success in learning for students based on their races, incomes, and other social conditions. Eliminating those structural and institutional barriers to

educational opportunities requires systemic change that allows for distribution of resources, information and other support depending on the student's situation to ensure an equitable outcome.

Minnesota State has established the following goal: "By 2030, Minnesota State will eliminate education equity gaps at every Minnesota State college and university."

Under the umbrella of these statements and goals, multiple initiatives are in place to address disparities or gaps in performance. For example, within the Minnesota Department of Education there is an effort to better align CTE work and ESSA initiatives. We support and collaborate with state specialists and educators in our special education division, homeless student liaison staff, as well as our English learner division, all of whom work toward reducing and eliminating gaps in performance.

There is also state legislation annually requiring each district to identify any existing gaps in performance as well as to document strategies for closing those gaps. Secondary consortium leaders are able to access a summary of their districts' publicly available World's Best Workforce and achievement and integration plans in order to determine whether CTE students would benefit from additional support of existing district goals and strategies or whether more is needed in order to support CTE teachers and students more specifically. Finally, it is also anticipated that secondary staff would utilize and share forward any resources produced by Advance CTE, Regional Education Laboratory (REL), or Midwest Comprehensive Center in support of continuous improvement for all CTE students.

With these overarching goals, and the principle of equity within our state's Perkins plan, our work will align with and continue to focus on:

- Disaggregation of student data metrics to inform equity work and develop mechanisms to share data and review
- Providing consultative and communicative structures
- Incentivizing innovations to enhance access, improve student engagement and support, mitigate policy barriers, and expand workforce diversity and strategic talent management

The reserve allocation distributed to local consortia at 15% is one opportunity for financial support for this equity work. In addition, the state will continue to invest leadership funds to support professional development and technical assistance at the state and local levels. Individual consortium interventions will arise from the CLNA.

III. Assurances, Certifications, and Other Forms

A. Statutory Assurances

Verified electronically.

B. EDGAR Certifications

Verified electronically.

C. Other Forms

Verified electronically.

IV. Appendix

A. Responses to Public Comments on the State Plan Annual Revision

12 individuals submitted comments on Minnesota's state plan priorities and activities during the 30-day period. Details about each comment are displayed in the table below along with the response from Minnesota State and/or MDE staff.

Feedback via Public Comment Process

Start time: 12/8/2023 12:05:28 PM; End Time: 12/8/2023 12:14:50 PM;

Teacher (K-12);

Minnesota's Secondary CTE teachers have to fill out program approval and other items every 5 years. This process has been made progressively more difficult and seems to "never be good enough". There is no additional compensation or time given to the secondary teacher to do this and can only be done by them. At the same time, unlicensed and unqualified CTE teachers are coming into the classroom on variances who have no idea about how to do any of this and are able to access Perkins funding. There are no CTE teachers with the background to come into positions that know how to do all of this nor do they know how to manage a classroom, etc., and yet we are letting them access Perkins funds and making the program approval so difficult that it either is not going to get done or an experienced teacher will be left with the responsibility to do it all without extra time or compensation. Minnesota's program specialists should not be making it their mission to make things hard for the teachers that are doing the work but should perhaps be focusing more on ensuring there is a pipeline of qualified teachers to fill jobs. Perkins money could be used to create more licensing and incentives to get more Business, FACS, AG, etc., teachers who are

State Response

Thank you for your feedback. Program approval is an important process to ensure CTE program quality and is required by Minnesota Rule 3505.2550. Program specialists want to help you with this process; please reach out to them for technical assistance. Please continue to provide feedback on how we can improve the program review process.

All CTE teachers in Minnesota are appropriately licensed. In positions that are difficult to fill, individuals may be able to receive an Out-of-Field permission (OFP) from the Professional Educator Licensing and Standards Board (PELSB). It is difficult to fill some CTE teaching positions in many areas of the state. Teacher recruitment, retention, and training is a continuing focus in Minnesota and is a priority of the Perkins legislation.

fully qualified to manage and teach in our secondary schools. If this is not fixed, nothing else will work because you will be missing a critical part of the process--qualified CTE teachers at the high school level.

Start time: 12/8/2023 3:38:49 PM; End Time: 12/8/2023 5:30:22 PM;

Director of Enrollment at Minnesota State

Tech College;

Our college enrollment is at an all-time high and Perkins funding is vital to help develop pathways for the future of our young adults, communities and the State. Thank you for your comment. CTE is critical to helping students achieve success in high-skill, high-wage, and in-demand careers.

Start time: 12/8/2023 5:04:12 PM; End Time: 12/8/2023 5:30:22 PM;

Teacher (K-12);

As a part time, small, rural 7-12 tech ed teacher (I teach 5-12 band during the other ½ of the school day), first, I must say that Perkins V money has completely transformed my shop. I have moved from just construction skills to CNC routing and plasma machines. I have replaced antiquated machines and updated my machines closer to what one might use in a smaller industry. This summer, I took AutoCAD training and Perkins V paid for the class. Because of my limited teaching time, I have a hard time finding a way to build upon introductory level classes. I want to expose my students to a wide variety of careers in the hope that they may find some desire to pursue in industry or in a trade school. I think there is value in small schools focusing on just one thing...especially in small schools. I grew up in a VERY rural NW Minnesota school of 150 students K-12. The reason I decided to become a shop teacher 10 years ago was from ONE introductory level class I had in high school for building small cabinets. Please don't limit our plan authorization to just pathways that go beyond introductory for those of us that are the only tech ed teacher

Thank you for your comment and your commitment to Career and Technical Education. As you have indicated, small, rural schools face unique challenges in providing CTE programs to students. For this reason, Minnesota has structured the Perkins Reserve funding to focus on areas of highconcentrations of CTE participants and in rural areas. Please connect with your school and district administrators and Perkins grant coordinators to inform them of your needs in the classroom. They are in the best position to help you expand your CTE offerings. Your input is vital to the Comprehensive Local Needs Assessment conducted at least every two years.

in the school. We can offer lots of different things....just not as deep as you wish we could. Thank you!

Start time: 12/11/2023 8:27:29 AM; End Time: 12/11/2023 8:29:44 AM;

Teacher (K-12);

I hope more goes back to schools and students than what happens currently. I teach in South Central MN and my first 5 years we would get money into our district to help get students access to equipment that we couldn't get otherwise. The last 7 of our CTE departments have received \$0. Where does all this money go?

Thank you for your comment. Perkins funding is distributed by formula to 23 regional consortia throughout the state. Your district is a member of one of these Perkins consortia. Each consortium conducts a Comprehensive Local Needs Assessment (CLNA) at least every two years to determine what the needs are for the region. Based on the consortium needs identified in the CLNA, Perkins consortium leadership teams determine how to prioritize their use of funds. Use of funds is based on needs; some districts may receive more funding than others and some may receive no funding for a particular year. Find out which Perkins consortium your district is a member of and discuss with administrators how funding decisions are made for the consortium. Your input is vital to this process; make sure administrators are aware of the needs of your program.

Start time: 12/11/2023 8:50:04 AM; End Time: 12/11/2023 8:53:20 AM;

Teacher (K-12);

As a long-time technical educator, one of the most challenging things is the availability of consumable supplies. There should be some provisions in the funding to allow for this.

Thank you for your comment. Each local recipient of Perkins funding should use such funds to develop, coordinate, implement, or improve Career and Technical Education programs. Because consumable supplies are a part of the basic operational costs required to conduct a course or program, they should be funded with state or local funds. Perkins funding is intended to supplement CTE programs beyond their normal operational costs and cannot be used to supplant (replace) state or local funds. Using federal Perkins dollars for consumable supplies would constitute supplanting of state or local funds and would therefore be unallowable according to Perkins legislation. It's important to note that in Minnesota, costs for consumable supplies may be included in

Start time: 12/20/2023 11:43:17 AM; End Time: 12/20/2023 11:56:59 AM; School leader (College Administrators, Secondary Administrators, etc.); The reserve funds may be too limiting.

The reserve funds may be too limiting. We would like more local control. "15% will be distributed as reserve funding to target support for rural areas and applications serving high numbers of CTE students." (Which is on the summary page and page 61 in the plan) It would be preferred if the 11 narratives and the performance indicators were more aligned. Secondary Core indicator 4S1 focuses on non-trad (gender). (page 10 of 24 of

the grant template) Should this be a measurement for all Special Pops? Nontrad seems outdated.

the state CTE levy intended to support some costs of CTE programs.

Thank you for your comment. Perkins consortia determine, based on the results of the Comprehensive Local Needs Assessment, how reserve funding will be used in their CTE programs. As such, there is local control in determining how funds are used at the local level. Perkins legislation requires that reserve funding be used to foster innovation through the identification and promotion of promising and proven CTE programs, practices, and strategies; or to promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, highwage, or in-demand occupations or industries.

Regarding alignment of narratives and performance indicators, it's important to note that Narratives #1 through #9 are required by Perkins legislation to be included in the local application for funding.

Performance indicators are also specified by legislation. Therefore, better alignment of narratives #1-#9 with performance indicators would require a change to the Perkins legislation. Narratives #10 and #11 were added at the state level to provide more information on use of reserve funding at the local level and to determine procedures for consortium governance.

Individuals preparing for non-traditional fields is one of 9 categories of special populations defined in Perkins legislation. Some students fall under 2 or more of the special population categories. In fact, non-traditional participation (4S1) does apply to all students including students in special populations as defined in Perkins legislation. A career pathway is considered "non-

traditional" for a gender if less than 25% of employees in those fields are of that specific gender. The intent of tracking nontraditional participation is to encourage more of a balance in gender participation in these fields to provide more opportunity for individuals in the workforce and to better fill workforce shortages.

Start time: 12/20/2023 11:54:41 AM; End Time: 12/20/2023 11:57:56 AM; School leader (College Administrators, Secondary Administrators, etc.); Need to add Academic Affairs to the specificity of the area outlines in Academic and Student Affairs (p.10) especially since early college opportunities, program approval and transfer, faculty credentialing, and etc. are functions of Academic Affairs.

Thank you for your comment. Academic Affairs has been included as suggested.

Start time: 12/20/2023 8:33:10 AM: End Time: 12/20/2023 12:08:20 PM; School leader (College Administrators, Secondary Administrators, etc.); The plan looks really good - I found some new resources/websites that we can use in our district. I was happy to see the the funding was 50/50 for Secondary and Postsecondary. I would like to see 1.) The language for reserved funding be open to local control instead of focusing on rural & # of CTE Students. 2.) Increased alignment with the 11 narratives and the performance core indicators. 3.) Secondary Core Indicator 4S1 focuses on non-trad (gender). Nontrad seems outdated as WIOA pulled it from their outcomes over 10 years ago. The focus is all on Performance Gaps and Special Populations. Should this indicator measure # of Spec Pops instead of non-trad?

Thank you for your comment. You may be confusing how Reserve funds are distributed with how these funds are used at the local level. Perkins legislation directs that Reserve funds may be awarded to local recipients in rural areas, and/or areas with high percentages or numbers of CTE participants. However, Perkins consortia determine, based on the results of the Comprehensive Local Needs Assessment, how reserve funding will be used in their CTE programs. As such, there is local control in determining how funds are used at the local level. Perkins legislation requires that reserve funding be used to foster innovation through the identification and promotion of promising and proven CTE programs, practices, and strategies; or to promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, high-wage, or indemand occupations or industries.

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Start time: 12/20/2023 2:21:41 PM; End Time: 12/21/2023 9:10:59 AM; School leader (College Administrators, Secondary Administrators, etc.); The reserve funds are limiting. We would like more local control. "15% will be distributed as reserve funding to target support for rural

more local control. "15% will be distributed as reserve funding to target support for rural areas and applications serving high numbers of CTE students." Reserve is always confusing for us to manage, and it would be better to reduce the percentage significantly or remove reserve altogether. Better align the

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11 narratives and the performance indicators. 3P1 and 4S1 focus on non-trad (gender). This is not at all aligned with our MinnState equity 2030 goal, nor is it what our industry partners are asking for. We need special populations to be measured in this indicator, not just gender. Secondary should have a larger portion of the allocation. Typically they are splitting between multiple school districts, having to manage and report, while there are typically only 1-2 post-secondary partners at each Page 4 of 7 table. (I'm saying this as a post-secondary rep!)

Reserve funding is determined at the state level, so it is possible to revise this percentage on a scale from 0% to 15%. Minnesota decided in the original Perkins V 4-Year State Plan to set the Reserve funding level at 15%. After considering other options, we decided to maintain the Reserve funding level at 15%, primarily because most consortia would see a significant decrease in their award if Reserve funding was reduced or cut altogether. Please contact us if you are confused about the use of Reserve funding. We would be happy to provide technical assistance to address this confusion.

Regarding alignment of narratives and performance indicators, it's important to note that Narratives #1 through #9 are required by Perkins legislation to be included in the local application for funding. Performance indicators are also specified by legislation. Therefore, better alignment of narratives #1-#9 with performance indicators would require a change to the Perkins legislation.

Non-traditional participation performance indicators are federal indicators applicable to all states and therefore may not be in alignment with Minnesota State Equity 2030 goals.

When Perkins V was implemented,
Minnesota decided on a 50/50 split of
funding to secondary and postsecondary.
We've decided to continue with this split in
this state plan update because there were no
concerns or specific rationale made known to
us as to why it should be changed.
Determining the funding split is a state
decision and, as such, can be reconsidered at
any time.

Start time: 12/21/2023 1:06:29 PM; End Time: 12/21/2023 1:13:13 PM; Parent (Guardian); Teacher (K-12);

1. The reserve funds may be too limiting and prescriptive. I would like to see more local control. 2. I would think that if the 11 narratives and the performance indicators were more aligned, it would be easier to track success. 3. Secondary Core indicator 4S1 focuses on non-trad (gender). (page 10 of 24 of the grant template) Should this be a measurement for all Special Pops? Nontrad seems outdated. 4. 3P1 is also focused on gender representation which doesn't seem to be in line with the state equity goals or what industry is asking for.

Thank you for your response. Perkins consortia determine, based on the results of the Comprehensive Local Needs Assessment, how reserve funding will be used in their CTE programs. As such, there is local control in determining how funds are used at the local level. Perkins legislation requires that reserve funding be used to foster innovation through the identification and promotion of promising and proven CTE programs, practices, and strategies; or to promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, highwage, or in-demand occupations or industries.

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Please note that data can be disaggregated to determine performance by special population category.

Thank you for providing this feedback. In response to your public comment, the following changes were made in the State Plan:

Page 28—"Creating more opportunities for secondary teachers to meet licensure requirements for programs within CTE, including work-based learning.

Page 35--"Each student participating in an industry-aligned WBL opportunity must have a training plan developed in collaboration

Start time: 1/2/2024 12:42:34 PM; End Time: 1/2/2024 1:03:34 PM; School leader (College Administrators, Secondary Administrators, etc.); Page 28: "Creating more opportunities for secondary teachers to meet the CTE and work-based learning (WBL) licensure and certification requirements." Suggest striking "and certification requirements" as there are no such thing as CTE certifications in Minnesota, only licenses. Page 35: "Each student participating in an employer-aligned WBL opportunity must have a training plan prepared by the WBL coordinator and the employer ..." Suggest revising to indicate that the student is involved in the development of the training plan as well as that is best practice. Page 66: Numerator definition consider including "completed one or more courses that include formal work-based learning prior to graduation" to better align with Perkins definition of WBL rather than rely on state program approval definition. In addition, in the current proposed definition, "concentrator" (at least 2 courses in since CTE program) calculation may conflict in definition (one or more WBL courses...) Page 71 - Reference to "USDOE" is the United States Department of Energy. Perhaps what is meant is "US ED?" Page 78 - "Perkins V is deeply rooted in partnerships between business/industry and education through work-based learning opportunities provided for students, which is so important that Minnesota has chosen Work-based learning (5S3) as our Perkins quality indicator." If this is true, it is even more reason to consider the Perkins definition of WBL and include all types of WBL experiences in the numerator definition on page 66.

with the WBL coordinator, student, and the employer...

Page 71—References to "USDOE" were removed.

Response to public comment regarding pages 66 and 78: Thank you for your thoughtful response. Although the details of the business rules are not provided, the current definition for the (5S3) Program Quality: Work-Based Learning indicator provided within the State Plan is fully aligned with the definition listed in federal legislation (Section 2(55)). With regard to CTE concentrators, our CTE concentrator definition requires a student to successfully complete 150 or more course hours within one career field in a state-approved CTE program. There is no conflict with a student becoming a CTE concentrator and also taking a work-based learning course, or with taking multiple workbased learning courses either separately or concurrently with other areas of CTE concentration across the student's high school experience.

Start time: 1/7/2024 4:00:35 PM; End Time: 1/7/2024 4:23:29 PM; Faculty (College and University); School leader (College Administrators, Secondary Administrators, etc.);

"Law enforcement" appears only once in the document and "police" and "policing" and "peace officer" appear nowhere at all. That is regrettable as (1) Minnesota State trains virtually all new Minnesota peace officers in its two-year and four-year Professional Peace Officer Education programs spread across the state, (2) one with any two-year or four-year undergraduate degree in any topic can take a policing Certificate program and be peace

Thank you for your comment. The Minnesota Perkins Plan supports all CTE careers that are high-wage, high-skill, and in-demand, including law enforcement. It's important to note that approximately 86 percent of Minnesota's graduates in law enforcement graduate from Minnesota State institutions. Decisions on funding for specific career pathways are made at the local level through Perkins consortia and are based on results from the Comprehensive Local Needs Assessment (CLNA). If local Perkins consortia determine that law enforcement is a priority in their region, they should be investing Perkins funding in those programs. Also,

officer license-eligible in just one calendar year, (3) Minnesota law enforcement agencies are fighting a currently losing battle hiring new officers as recent high-profile police use of force situations have led to an exodus of existing officers from the profession, (4) poor business decisions are often made in troughs (such as where hiring rates are low and agencies are falling well short of optimum officer staffing levels - many schools, law enforcement agencies, and even the State Legislature have all reduced police education and minimum age requirements of late as a response to the trough in officer hiring - that is a miserable choice). (5) the Minnesota Peace Officer Standards and Training Board appears to be phasing out four-year police education programs (such as in Minnesota State schools) and focusing instead or focusing far more Page 5 of 7 on two-year officer training schools to rush young and inexperienced and immature 18-20 year-olds into sworn police service positions, (6) the MN POST Board and the State Legislature also seem to prefer a single monolithic police training program thus losing the advantages and creativity of maintaining diversity among programs and schools, and (7) most law enforcement agencies would love to hire and retain the diverse and disadvantaged and underrepresented students favored by this Perkins V plan. It is time to move law enforcement education to the top of the Perkins V priority list and save the four-year Minnesota PPOE schools to preserve expertise, creativity, and commitment to procedural justice for all.

Minnesota State has developed a State Taskforce on Law Enforcement Education Reform--

https://www.minnstate.edu/le/index.html
Please investigate the work being done by
the taskforce—your concerns may be
addressed there as well.

B. Local Application and CLNA Templates

Local Application Template

CLNA Template