November 14, 2013

The Honorable John Kline
Chairman
House Committee on Education and the Workforce
US House of Representatives
Washington, DC 20515

The Honorable George Miller
Ranking Member
House Committee on Education and the Workforce
US House of Representatives
Washington, DC 20515

Dear Chairman Kline and Ranking Member Miller,

On behalf of the nation’s middle level and high school principals, assistant principals, and other school leaders, the National Association of Secondary School Principals (NASSP) would like to offer recommendations on the upcoming reauthorization of the Carl D. Perkins Career and Technical Education Act.

NASSP is a national leader in secondary school reform and has created a framework upon which to improve our nation’s K-12 schools called *Breaking Ranks: The Comprehensive Framework for School Improvement*. The framework does not prescribe a specific model that a school must follow, but rather builds upon the individual school’s data to assess strengths and identify needs so that a customized plan for school success can be developed. Regardless of grade level, all schools must address the three core areas of collaborative leadership, personalizing the school environment, and curriculum, instruction, and assessment to improve student performance.

As schools work to implement college and career-ready standards for all students, we feel that a reauthorized Perkins law has great potential to promote a personalized learning environment for each student through strong curriculum and instruction, increase student achievement through integrated academic and career and technical education (CTE) programs, and further engage students in their learning. According to the Association for Career and Technical Education, students participating in CTE programs have graduation rates of more than 90%, and we should ensure that more students across the country have access to quality CTE programs.

NASSP was very pleased to be represented at the September 20 subcommittee hearing by the 2014 MetLife/NASSP National High School Principal of the Year, Dr. Sheila Harrity, who is the principal of Worcester (MA) Technical High School. Worcester Tech, which was also named a MetLife Foundation-NASSP Breakthrough School in 2011, has 1,400 students in 24 technical programs within four small learning communities. Once the lowest-performing high school in the city and the poorest performing vocational school in the state, Worcester Tech’s students are graduating at high levels and performing well on state assessments, and the achievement gap has decreased significantly for all student subgroups.

Students are graduating college and career-ready at Worcester Tech, taking AP courses and earning a high school diploma in addition to receiving college credits and an industry credential in some fields. Dr. Harrity has been able to leverage partnerships with business and industry and four-year colleges and universities, which help support a full-service restaurant, day spa and salon, 16-bay auto service center, and veterinary clinic at the school. The school’s success and the city’s success are intertwined because students are leaving Worcester Tech with the skills to secure good-paying and rewarding jobs in the community.

US Department of Education’s Blueprint
In reviewing the Obama administration’s blueprint for Perkins reauthorization that was released in March 2012, NASSP does support a number of the goals outlined in *Investing in America’s Future: A Blueprint for*...
Transforming Career and Technical Education, including the four principles of alignment, collaboration, accountability, and innovation.

We support the proposal specifying that CTE programs must offer a streamlined and structured sequence of courses that span secondary and postsecondary education, lead to an industry certification or license and a postsecondary certificate or degree, and enable graduates to gain employment upon program completion.

NASSP also agrees that the state role in administering CTE programs should be strengthened. We support the requirement that state educational agencies collaborate with their workforce and economic development agencies to identify in-demand occupations in high-growth industry sectors and make this data available to CTE programs in their region. We feel that this provision could assist local CTE administrators to ensure that the programs are responsive to labor-market needs and aligned with regional priorities for economic growth. We also feel strongly that states should connect data on CTE programs with their existing longitudinal data systems.

While we see the value of strengthening the participation of employers, industry and labor partners in the design and execution of CTE programs, we oppose the requirement for a private sector match at the district level. We have received feedback from principals in high-poverty districts that do not have large industries in their region that local businesses would not be able to afford such a partnership and they should therefore not be mandated. Similarly, we oppose the proposal that would permit only consortia of districts and postsecondary institutions and their partners to apply to states for Perkins funding. This requirement could devastate CTE programs in our nation’s rural communities. Finally, we would insist that the reauthorized Perkins law continue to require states to distribute Perkins funding to districts by formula as opposed to a competitive grant.

**Educator Quality**

State leadership activities should be focused on leadership development and technical assistance for districts and schools. States should be allowed to use Perkins funds to provide professional development opportunities for current CTE leaders that will help them develop the appropriate skills to lead CTE programs. States should also be allowed to use their funds for leadership training programs that would help current principals, assistant principals, and other school leaders to manage CTE programs in their schools.

High quality CTE programs require teachers who are knowledgeable and proficient in both effective teaching methods and technical skills. States should set a high bar for entry into the profession by requiring rigorous qualifications for CTE teachers, but they should also offer some flexibility in providing alternate routes into the teaching profession. For example, Virginia offers a technical professional license to individuals who are recommended by an employing district, are licensed or certified in their respective CTE areas, if applicable (or can demonstrate competency), provide evidence of at least two years or 4,000 clock hours of satisfactory occupational experience, and have completed 9 semester hours of specified pedagogy courses. CTE teacher candidates should have additional training and support in instructional practices, classroom management, and the use of data and assessments to ensure they’re effective in the classroom.

Professional development must strengthen the capacity of CTE teachers to collaborate and establish meaningful partnerships with content area teachers and integrate academic and CTE curricula and coursework. Professional development activities should focus on making numeracy and literacy relevant in the coursework through effectively linking critical thought processes in CTE courses to the core content areas where many students struggle. CTE personnel must learn how to teach, support and reinforce learning for all students, and apply new basic skills in their classroom. NASSP would also encourage CTE teachers to receive regular mentoring or coaching to support them in providing high-quality instruction for diverse learners such as students with disabilities and English language learners.

As states transition to new, higher standards in English/language arts, students will be expected to possess the reading, writing, thinking, listening, and speaking skills necessary for success in college and careers. Thus,
cross-content literacy instruction has moved from an option to a necessity in our middle level and high schools. CTE textbooks already require a high level of literacy comprehension—higher than all other content area courses, and CTE teachers will be expected to integrate literacy throughout their instruction on top of the more rigorous course content. While all content area teachers will need professional development in order to implement a successful schoolwide literacy initiative, CTE teachers who do not come from a traditional education background may require even greater assistance in this area.

CTE teachers also need content-based professional development and additional training to ensure they’re knowledgeable of the latest equipment and certification requirements of their industries, especially in rapidly changing fields and STEM courses.

**Personalization**
Quality CTE programs should be part of a schoolwide effort to personalize the learning environment for each student and ease students as they transition from middle to high school and from high school to college or the workforce. Students should have the support of individualized guidance on various academic and career requirements, as well as alternative settings for learning and applying the necessary competencies. A range of catch-up and second-chance options should be readily available for students who have fallen behind in elementary or middle school or need extra help and instructional time. Districts should be allowed to use Perkins funding for the creation of personal plans for progress for students participating in CTE programs that would address the academic, social, and developmental needs of each student to help them achieve their education and career goals.

**Middle Level**
School leaders know that the middle grades are a crucial time to engage students in a rigorous curriculum that will help them transition into high school and be successful in postsecondary education or careers. According to ACT, the level of academic achievement that students attain by eighth grade actually has a larger impact on their college and career readiness upon graduation from high school than anything that happens academically in high school. NASSP has long encouraged a federal focus on middle level reform, including support for the Success in the Middle Act (H.R. 2316) to ensure that students are taught an academically rigorous curriculum with effective supports so that students complete the middle grades prepared for success in high school and postsecondary endeavors.

NASSP also supports the BUILD Career and Technical Education Act (S. 1293), which was introduced by Senator Jeff Merkley (D-OR) in July. The bill would authorize $20 million for the establishment of a pilot grant program to support CTE exploration programs in middle and high schools not currently receiving Perkins funding. Districts could use the grant for staff expenses and professional development, purchasing or leasing equipment, or evaluating the impact of CTE exploration programs on students’ transition to high school CTE programs of study and their performance in those programs.

**Accountability and Data Collection**
Federally supported CTE programs should increase student achievement in academic subjects as well as enhance technical literacy, career orientation, and college and career-readiness. Programs should be regularly evaluated to determine their effectiveness and data should be reported on factors such as performance of students on end-of-course assessments; student participation in and completion of dual academic and CTE pathways to graduation; increased graduation rates of CTE students earning a regular high school diploma; student procurement of industry certifications and college credit; and successful student participation in postsecondary study, internships, and employment.

**Funding**
Adequate federal support for expanding and replicating high-quality CTE programs is imperative. At a minimum, state basic grants should be more than doubled in size, to $2.5 billion, over the five-year authorization period. We also feel strongly that the reauthorized Perkins should continue to support equipment
purchases necessary for up-to-date, high-quality CTE study, as well as train the instructional staff members to use the technology to complement sound curricula and teaching.

As we think about the reauthorization of the Carl D. Perkins Career and Technical Education Act, NASSP hopes that the committee will stay focused on the program’s ability to: 1) prepare all students for postsecondary education and work opportunities; 2) support and enhance academic achievement and technical literacy; and, 3) improve middle level and high schools to ensure higher student achievement and graduation for all students.

Should you have any questions about our recommendations, please feel free to contact Amanda Karhuse, NASSP Director of Government Relations, at karhusea@nassp.org or 703-860-7241. We look forward to working with you during the reauthorization process to ensure that more students have access to rigorous CTE programs that will help them graduate from high school with the skills they need to be successful in college and careers.

Sincerely,

JoAnn D. Bartoletti
Executive Director
NASSP