

**WASHINGTON STATE
WORKFORCE TRAINING AND EDUCATION COORDINATING BOARD
MEETING NO. 192
October 21, 2015**

CARL D. PERKINS OPT-IN/OPT-OUT OF WIOA COMBINED PLAN

Background

The Workforce Innovation and Opportunity Act of 2014 (WIOA) provides states with the option of submitting either a Unified or a Combined State Plan on March 3, 2016. The difference between the two plans centers around which programs will be included in the strategies the state adopts for implementation of the Act.

A Unified State Plan would include only the core programs: WIOA Adult, Youth, Dislocated Worker, Adult Basic Education, Wagner-Peyser, and Vocational Rehabilitation.

Under a combined plan the Carl D. Perkins Career and Technical Education Act of 2006 is one of 11 additional programs that could be included.

On August 17, 2015 the Board approved a recommendation to submit a combined state plan, with the further recommendation to include as many partner programs as possible, after consideration of mutually beneficial impacts to customers.

The Workforce Board has responsibility for the Perkins program in Washington. The Workforce Board administers this program in close partnership with the State Board for Community and Technical Colleges (SBCTC) and Office of Superintendent of Public Instruction (OSPI). These funds support career and technical education programs at school districts and community and technical colleges.

Workforce Board staff consulted with both OSPI and SBCTC to determine the benefits and challenges that participation in a combined plan would have on the systems' programs. (See Appendix A)

Regardless of whether Carl Perkins is included in the combined WIOA plan, it is included in *High Skills, High Wages*, the state's strategic plan for workforce development, connecting career and technical education to the goals and strategies of our state's workforce development system. The two-year community and technical colleges and the public secondary schools use Perkins funds to improve aspects of career and technical education, including career pathways, professional development, curriculum development, providing access to work-based learning, and industry-recognized credentials.

The Board requested information about potential reauthorization of the Elementary and Secondary Education Act, the Higher Education Act, as well as the Perkins Act. While all three federal Acts are up for reauthorization, the current Congressional turmoil makes it unlikely that

any of the three reauthorization bills will move forward before the end of the year. Given that 2016 is an election year, it may well be 2017 before any of these bills move into reauthorization.

Recommendation: Staff recommends that the Board opt out the Carl D. Perkins Act of 2006 from the state's WIOA Combined Plan. **(Action)**

RECOMMENDED MOTION

WHEREAS, the Workforce Training and Education Coordinating Board (Workforce Board) is designated as the state's Workforce Development Board by the Governor; and

WHEREAS, on August 17, 2015 the Workforce Board approved a recommendation to submit a combined plan under the Workforce Innovation and Opportunity Act of 2014; and

WHEREAS, The Workforce Board is designated as the state's eligible agency for the Carl D. Perkins Act of 2006; and

WHEREAS, the Workforce Board weighed the pros and cons of including the Carl D. Perkins plan into a combined WIOA plan;

THEREFORE BE IT RESOLVED, the Workforce Board approves a recommendation to opt the Carl D. Perkins Act of 2006 out of the combined plan under the Workforce Innovation and Opportunity Act of 2014.

BE IT FURTHER RESOLVED, The Workforce Board recommends that secondary and postsecondary local Perkins plan elements continue to include linkage to the state's strategic plan.

PROS	CONS
<p>Committing to a federal plan is a higher level of commitment that will weather the transitions of state shifts in administration and priorities. While federal plans can be modified, it requires negotiation with federal agencies.</p>	<p>CP will be part of the state’s broader workforce development plan. The Board establishes the parameters for how CP funds are used—defining the “what” or the goals and objectives for use of these funds. Local school districts and colleges determine the “how.” Meeting the parameters for the WIOA plan may be overly prescriptive on the “how.”</p>
<p>Focus on the single exit across all WIOA partner programs may result in new resources to support students, especially targeted student populations, to access and complete CTE concentration programs at the secondary and postsecondary level.</p>	<p>Proposed WIOA planning guidelines for use of CP funds are focused on ensuring that all current provisions of the program and performance measurement are kept intact. Unlike the guidance for other potential combined plan programs, the CP guidelines do not ask how the program will be improved through integration under WIOA, but remain focused on current CP student populations and current structures and services. The U.S. Department of Education is required to provide an analysis of additional work burden created by these guidelines. They conservatively estimate 2,240 additional FTE hours to complete the CP-WIOA combined planning process.</p>
<p>While the U.S. Department of Education has not yet identified how CP and WIOA could benefit from closer alignment, there is interest from Congress and others to explore new practices to enhance student outcomes, and to help more individuals benefit from CTE programs. As an early implementer, Washington may serve as a learning laboratory to Congress and the federal agencies. Washington may be given latitude as it “experiments” with the alignment of CP and WIOA.</p>	<p>Federal funding for all partner programs is at maintenance levels and may even decrease due to sequestration and congressional priorities. After a great deal of collaborative effort, CP may find no added benefit, and yet may be held to new standards under WIOA.</p>
<p>WIOA and secondary and postsecondary CTE in Washington have made establishment of career pathways a priority. Alignment of funding streams could potentially move Washington’s efforts further, faster. Alignment within local and state sector strategies could help shape</p>	<p>Being an early implementer may level an unwanted microscope on Washington that could result in disallowed costs or penalties. There will be a new federal administration that may have different priorities and may not be supportive of state CP-WIOA efforts.</p>

<p>these efforts.</p>	
	<p>Secondary and postsecondary CTE in Washington both aim to be responsive to the needs of businesses as well as students, and have developed successful Career Pathway models. CP funds are used to help educational institutions be responsive through flexibility of allowable uses. The institutions count on CP funding to help support their relationships with employers, including, but not limited to modernizing the knowledge of faculty and classroom curriculum, purchasing industry-recommended equipment, creating workplace learning opportunities for students, and expanding classroom capacity. There is concern that existing relationships with employers might be undermined by shifts in funding priorities to WIOA targeted industry sectors.</p>
	<p>There is a conflict of priority of service between CP and WIOA. Both are designed to serve a universal population, but much of WIOA is geared towards 14 targeted subpopulations. CP is only a small portion of the overall funding for secondary and postsecondary CTE in Washington, and is designed to enhance services and performance within existing structures. Funding structures at the education institution level are comprised of multiple funding streams each with their own requirements, including funding that targets many of the priority populations identified in WIOA. Attachment to WIOA might shift service priority disproportionately, and jeopardize other funding streams—causing other CTE funds to follow the WIOA priorities. Again, CP priorities can be articulated in the state plan without subsuming other, much larger CTE funding priorities. Or, more likely, CP parameters may not be realized by local institutions with too many conflicting priorities.</p>
	<p>The community and technical colleges and K-12 school districts are each independently governed. CP funding is a very small portion of local budgets. Some institutions might be disinclined to accept CP funds if too many strings are attached, or the added work to comply with new parameters is too burdensome.</p>
	<p>Decisions about services and fund usage will largely be made at the local level. CP, like other combined plan partners, does not have a voice at the decision-making table at the local level. Their organizations do not have seats on Workforce Development Councils.</p>

	<p>The CP federal Act is up for reauthorization, along with the Elementary and Secondary School Act (ESEA) and the Higher Education Act (HEA). The reauthorization of these three Acts has been made a priority of Congress. There is much discussion about revising CP, and aligning it more closely to WIOA, ESEA or HEA, or a combination across these Acts. It therefore seems premature to undertake major changes until we have a better understanding of Congress' intentions.</p>