

## **Public Comment Received on Draft Perkins V State Plan.**

The public comment period was open from December 23, 2019 through February 21, 2020.

## Ahner Jenna

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**From:** Whelan Maureen  
**Sent:** Thursday, February 6, 2020 12:49 PM  
**To:** Delaware SBE  
**Subject:** Perkins V State Plan

Good afternoon,

Thank you for all the work exerted in the design of this plan to ensure that it is responsive to Delaware's workforce needs. My appreciation also for the extensive outreach effort to include as many stakeholders as possible in its development.

The purpose of the Perkins V State Plan aligns with other major Delaware initiatives currently taking place such as the Delaware Workforce Development Board's WIOA State Plan and the Governor's Delaware Correctional Reentry Commission. The DOE Adult and Prison Education Resources Workgroup is involved in these initiatives. The ability to coalesce the resources and stakeholders from these initiatives will provide Delawareans of all ages the expanded resources and pathways to reach their career goals.

With the inclusion of short term credential programs in the Perkins V Plan, adult learners, in both the community adult education programs and in the Prison Education Program, will have the opportunity to gain skills needed by Delaware employers in a process that builds credentials towards the attainment of a family sustaining career goal. To support this goal, I share the following recommendations: (1) areas of instructional/vocation need not previously served need to be designated in the plan, e.g. prison/correctional education and adult education integrated education and training projects and (2) collaboration between various types of training providers must be a requirement to best serve working Delawareans. One example would be the need for articulations among training providers and higher education institutions that credit adult learners with previous trainings from various providers in pursuit of degree attainment.

Thank you for your consideration.

Maureen

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**If you have any concerns, recommendations, or commendations, please share them by contacting me by phone or email.**



Mark T. Brainard, President

February 20, 2020

Delaware State Board of Education  
Attn: Perkins State Plan Review  
401 Federal Street, Suite 2  
Dover, DE 19901

Dear Members of the State Board of Education:

This letter serves as public comment from Delaware Technical Community College for the Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V) State Plan. Our concerns, related to the proposed distribution of funds and alternative postsecondary funding formula, are outlined below.

**Distribution of Funds**

*“The distribution of funds to eligible secondary (80%) and postsecondary recipients (20%) was determined through meetings with those stakeholder groups defined in the Act and as a result of public comments that prioritized high-quality CTE opportunities for all youth and adult learners.”* (Perkins V State Plan, page 40)

As a stakeholder group, Delaware Tech appreciates the outreach and open dialog from the Delaware Department of Education (DDOE) regarding the expected changes to the funding allocation, specifically in regard to the distribution of funds between secondary and postsecondary recipients. These discussions, one as recent as November 7, 2019, outlined DDOE’s plan to propose a 75/25 split based on a solid logic model of participants served. At a national level, 75% (42/56) of the states cite the postsecondary percentage at 25% or higher, while only 20% (11/56) cite this percentage at 20% or lower.<sup>1</sup>

Upon release of the Plan for public comment, this split changed to 80/20 due to *“meetings with stakeholder groups defined in the Act and as a result of public comments that prioritized high-quality CTE opportunities for all youth and adult learners”* (Perkins V State Plan, page 40, Paragraph 3). The College requests the distribution of funds to reflect a 75/25 split in order to ensure equity of funds available per CTE participants served.

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<sup>1</sup> [https://cte.careertech.org/sites/default/files/Secondary\\_postsecondary\\_split\\_2018.pdf](https://cte.careertech.org/sites/default/files/Secondary_postsecondary_split_2018.pdf)

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### **Alternative Postsecondary Funding Formula**

*“Delaware is proposing an alternative postsecondary funding formula that will result in a distribution of funds to those eligible institutions or consortia within the State that have the highest numbers of economically disadvantaged individuals ... Individuals who are designated as economically disadvantaged will be the number of unique individuals who receive any of the following assistance or who reside in the designated communities: 1) Federal Pell Grant recipients; 2) Federal Supplemental Nutrition Assistance Program (SNAP) recipients; 3) Federal Temporary Assistance for Needy Families (TANF) recipients; 4) Federal Medicaid recipients; and 5) Delaware Promise Communities residents.”* (Perkins V State Plan, page 45)

Delaware Tech understands that in order to include short-term credential programs as eligible for funding in the State’s Plan, the postsecondary funding formula must include additional methods beyond Pell eligibility to identify economically disadvantaged individuals. As an institute of higher education, the College is proud of the support services currently offered to our credit students enrolled in academic programs, 54% of whom are Pell eligible. However, we are concerned that significant infrastructure changes may be needed to provide the level of holistic, wraparound support services necessary to ensure the retention and success of the short-term program students under this proposed, expanded definition.

In addition, the Perkins V State Plan does not outline a clear, sustainable method for calculating the enrollments of economically disadvantaged students, the results of which will drive the financial distribution of postsecondary funds. When presented with this proposal in November 2019, the College submitted the initial data needed for DDOE to begin developing a fiscal model; however, there has been no follow-up communication or preliminary report provided to assist Delaware Tech in making an informed decision regarding the fiscal impact of this proposal. Delaware Tech requests, prior to finalizing and submitting the Perkins V State Plan, that a detailed method for defining the data elements and calculating enrollments be presented to the eligible institutions, along with the aforementioned fiscal model and projections.

As the only community college statewide with enrollments exceeding 31,600 credit and short-term training students, Delaware Tech has the opportunity to advance DDOE’s CTE education goals through equitable and realistic allocation of Perkins funds. We look forward to ongoing conversations as the State finalizes and submits the Perkins V State Plan.

Sincerely,



Mark T. Brainard  
President

## Ahner Jenna

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**From:** Hudson David  
**Sent:** Thursday, February 20, 2020 1:36 PM  
**To:** Delaware SBE  
**Subject:** Perkins V public comment

It is refreshing to see a renewed investment in the career paths of students that could be alternatives to the college path. This grant appears to focus on the very students that CTE benefits the most. One of our concerns is the lack of investment in CTE teachers that are coming in directly from the field and not from formal teacher preparation programs. Districts need resources to support such teachers, and they seem to be lacking in this proposal. There is also missing adequate support for a MTSS model within CTE. Now that we are allowing for CTE content going down into early middle school (or elementary depending on structures in different districts), what is the skills progression from 9th grade and beyond high school, and how does it impact school accountability when students choose a career outside of their career pathway? Thank you for your continued efforts to support students in finding careers through the CTE course of study.

## David Hudson

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## **Perkins V-- DACCTE Public Comment**

The Career and Technical Student Organizations (CTSOs) are organizations for students enrolled in Career and Technical Education (CTE) programs and are integral components of the instructional program. CTSOs have a positive impact on career development for students by providing skill training, leadership development and applied learning experiences at the local, state and national levels.

The Delaware Advisory Council on Career and Technical Education (DACCTE) is an advocate and strong supporter of the CTSOs and requests that specific language be included in the Perkins V State Plan to reflect the value and support for the eight CTSOs available to students in Delaware including: BPA, DECA, Educators Rising, FCCLA, FFA, HOSA, SkillsUSA and TSA and the permissible use of state and federal financial resources for attendance and participation in career related activities.