

April 9, 2019

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

Dear Members of the State Board:

Below is public comment for the Delaware Perkins V Transition Plan provided as a collaborative effort by the administration of the adult postsecondary divisions of New Castle County Vo-Tech School District, Polytech School District and Sussex Tech School District. Our comments and concerns are as follows:

1. "Students who complete a CTE program of study attain a secondary school diploma or its equivalent and an industry recognized credential, certificate, or license which holds value at the professional or postsecondary level and leads to an Associate and Baccalaureate degree program" (Draft Plan, Page 4, Paragraph 4).

This language indicates that all Perkins funded programs will lead to an Associate or Baccalaureate program, when, in fact, the ideal end state for many participants in short-term, middle skill programs may in fact be an industry-recognized certification or professional licensure that have no connection to a college degree.

Presenting alignment with college programming as an option rather than a requirement is consistent with the current understanding of the relationship between apprenticeship programs and college being used at the Federal level. For example, the Apprentice Hubs Across America Act, recently introduced by Senator Chris Coons, states the following: "Registered apprenticeship programs provide apprentices employment with structured on-the-job training, little to no student loan debt, competitive wages, industry-recognized credentials, direct access to jobs and careers, and in some cases, the potential to earn college credit toward an associate's or bachelor's degree"

(<https://www.coons.senate.gov/imo/media/doc/Apprenticeship%20Hubs%20Across%20America%20Act%20of%202019%20FINAL.pdf>).

In light of the above, we recommend replacing "...and leads to an Associate and Baccalaureate degree program" with "...and may lead to an Associate and Baccalaureate degree program."

2. "Postsecondary CTE programs are required to follow applicable State Registered Apprentice training requirements under 19 DE Adm. Code 1100 of the Delaware Administrative Code. Community college programs are approved by the Board of Trustees at the Delaware Technical Community College" (Draft Plan, Page 9, Paragraph 2).

This language indicates that all of the Perkins supported programming offered by the adult divisions of the three countywide vocational districts will be governed by "applicable State Registered Apprentice training requirements," while allowing for a much broader standard to govern the programs offered by Delaware Technical Community College. The current method of reporting Perkins participants is inaccurate and arbitrarily restricts the number of participants reported by the Adult Divisions to State Registered Apprentices, while at the same time, using a much more liberal standard that includes every workforce program participant at Delaware Tech. Despite previous inquiry, there has been no articulated reason for the application of an inconsistent standard. In spite of the possibility that the number of participants will be tied to future allocation of funding, no commitment has been made to correcting it for the current year. Instead, it has been suggested

that it be addressed after the adoption of the transition plan. We believe this is problematic, as the distribution of funding will certainly rely upon historical data.

First, we are requesting that the definitions be adjusted immediately, in order to ensure the data for this year, at the very least, is reported in a fair and consistent manner.

Second, we would like to see the same broad standard regarding the oversight and regulation of the training programs for the community college be applied to the postsecondary programming provided by the adult divisions. Each of these schools also has a school board which establishes rules and standards for the programming offered. If this is sufficient in one instance, it should be in the other as well.

3. "Local education agencies (LEAs) are required to offer early college credit through the CTE program of study. This information is approved as part of the Career & Technical Education Policies and Procedures. This can include articulated college credit, dual enrollment, concurrent enrollment, pre-apprenticeship, or early college high school programs" (Draft Plan, Page 10, Paragraph 1).

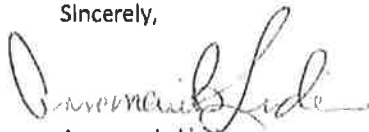
The statement that LEAs "are required to offer early college credit through the CTE program of study" appears to exclude linkages to non-credit programs at the postsecondary level. While the next sentence seems to modify this to include "pre-apprenticeship" programming, this does not completely resolve all of our concerns. First, as pointed out in #1 above, the language in the plan seems to indicate the only programming that will be recognized, apprenticeship or otherwise, is that which "leads to an Associate and Baccalaureate degree program." Second, the simple inclusion of pre-apprenticeship programming, which would lead to a Registered Apprenticeship, does not address the concerns articulated in #2 above.

We believe the language should be adjusted to include any program that leads to an industry recognized credential or professional licensure in an in-demand occupation.

4. "Additionally, Delaware recognizes the need for quality education programs for youth and adult learners who have not been successful within the regular school program. Often, in an instructional setting more appropriate to an individual's needs or based on an individual's circumstance, such as within a correctional institution, the learner can become highly successful in education and training programs that directly connect to the labor market. Policies, programs, and best practices established under the Act are used to work with education and training providers that serve incarcerated youth and adults and institutions that serve individuals with disabilities to more effectively promote academic instruction, technical skill development, and employability skills. Further, alignment to in-demand occupations and the acquisition of industry credentials that are valued by postsecondary institutions and employers are used as tools to assist the learner with transition into continuing education and employment" (Draft Plan, Page 12, Paragraph 4).

The scope of special populations related to adult learners addressed in this paragraph appears to be too narrow (i.e. limited to justice-involved and disabled populations). At the very least, we believe it should be expanded to address the specific and unique needs of adult English Language Learners.

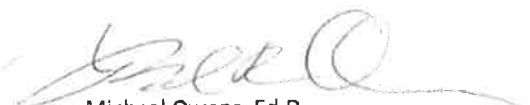
Sincerely,



Annemarie Linden
Director of Adult Education
New Castle County Vo-Tech



Elizabeth Jones, Ed.D.
Director of Adult Education
Polytech



Michael Owens, Ed.D.
Director of Extended Learning
Sussex Tech

April 10, 2019

Perkins Transition Plan Review

Delaware State Board of Education

401 Federal Street, Suite 2

Dover, Delaware 19901

Dear State Board Members:

In reviewing the Draft State Perkins V Transition Plan, I am very happy to see an expanded definition of adult learners in future planning for Perkins services. The alignment of Perkins funding with Workforce Innovation and Opportunity Act requirements that target adults with barriers to employment will enhance the ability of these at-risk adults to attain "living wage" jobs that can lead to careers with upward mobility. The inclusion of these adults - displaced homemakers; low-income individuals; Indians, Alaska or Hawaiian natives; individuals with disabilities; older individuals; ex-offenders; homeless; youth in or aged out of foster care; English Language Learners; migrant and seasonable farmworkers; individuals within two years of exhausting lifetime eligibility under part A of title IV of the Social Security Act; single parents; and long term unemployed individuals. (WIOA Section 3(24)) – will address employer needs for vacant positions and support children's success in K12 through their parents' success in training/education and the family's enhanced financial stability resulting from better paying jobs.

I am also excited by the possibility of braiding WIOA and Perkins funding in support of adult learners who want to enter integrated education and training programs. These programs provide academic instruction and vocational training concurrently geared towards employment in a specific career area. Research indicates that adults who can foresee a specific goal are more likely to persevere in programming until its conclusion. When adults can visualize employment or job promotion with the potential for entry into further vocational training or post-secondary education and/or the attainment of an industrial recognized credential as a "real possibility", their aspirations soar as never before and their efforts support themselves, their families, their workplaces and the state.

This state plan opens new possibilities for more Delawareans!

Thank you for this opportunity to comment on the proposed plan. Thank you also for your very valuable work.



Maureen Whelan
Director of Adult and Prison Education
Delaware Department of Education

