FINAL REPORT:
The Texas Education Agency’s Compliance with the Career and Technical Education Improvement Act of 2006 (Perkins IV)

I. Overview

The U. S. Department of Education (Department), Office of Vocational and Adult Education (OVAE), Division of Academic and Technical Education (DATE), conducted an on-site monitoring visit to the Texas Education Agency (TEA) on February 22-March 2, 2012, pursuant to the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins, Perkins IV, or the Act). The purpose of the visit was to assess the degree to which the TEA, which is the agency delegated by the Texas State Board of Education (the sole State agency) to administer its Perkins grants, is meeting the requirements of Perkins IV.

The monitoring team identified two (2) findings where the TEA is not meeting the requirements of Perkins IV. The findings are discussed in greater detail in the local applications section of this report. Applicable sections of Perkins IV are cited for the findings, along with corrective actions that the TEA must take to achieve compliance with Perkins IV. Unless otherwise noted, all corrective actions must be submitted to our office for review and/or approval as soon as possible, but no later than July 13, 2012.

Also identified within specific sections of the report are suggested improvement strategies for your State to strengthen its Perkins administration, implementation, and accountability systems. We encourage you to implement these strategies, although you are not required to do so.

II. Monitoring Team Members

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<thead>
<tr>
<th>Name</th>
<th>Area(s) of Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Andrew Johnson*</td>
<td>Fiscal Responsibility</td>
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<td>Marilyn Fountain</td>
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<td>Len Lintner</td>
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<td>Programs of Study</td>
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* Monitoring Team Lead
III. Areas of Review

A. State Administration

Current Status:

The Texas State Board of Education (TSBOE) is the eligible agency (sole State agency) responsible for the oversight of Texas’ Perkins grant. The Texas Education Agency (TEA) is responsible for the overall administration of the Perkins grant and the day-to-day supervision of the Perkins grant at the secondary level. The Texas Higher Education Coordinating Board (THECB) is responsible for the day-to-day supervision of Perkins grant at the postsecondary level.

Career and technical education programs at the secondary level are offered through 387 school districts (including 3 charter school districts). There are 47 consortia (shared service arrangements) with 29 school districts serving as the fiscal agent for these consortia and 18 regional education service centers (ESC) serving as the fiscal agent for these consortia. The career and technical education programs at the postsecondary level are offered through 50 community college districts, three State colleges, and four technical colleges.

The TEA established the Performance Based Monitoring Analysis System (PBMAS) for secondary programs. The PBMAS is a data-driven system focused on the academic skill attainment of career and technical education students including specific sub-populations. School districts receive a comprehensive report of the performance measures and low performing school districts are assigned a risk level associated with the level of intervention as well as the implementation of an improvement plan. The THECB conducts in-depth onsite reviews to ensure that Perkins funds are expended appropriately. Site visits are conducted on a four-year rotation.

The TEA’s Division of Program Monitoring and Interventions Unit (DPMI) provide administrative oversight of school districts to ensure excellence in education for all students. The DPMI are related to State and Federal accountability monitoring and interventions, school district investigations and sanctions, program monitoring, and interventions for the bilingual education/English as a second language CTE programs. The DPMI also conducts targeted on-site investigations to address concerns related to documented or ongoing risks as reflected in performance data. To support its monitoring efforts, the TEA developed an “On-Site Investigations Procedures Manual” that provides information and guidance to school districts receiving an on-site investigation.

The TEA has implemented a number of technical assistance strategies to support its local recipients in the implementation of Federal and State requirements. Training and technical assistance is provided to districts through regional training conducted by the ESCs and web-based training. At the post-secondary level, THECB provided technical assistance to institutions through web conferencing, conferences, meetings and workshops. They also maintain a listserv and an email discussion group to communicate with State and technical colleges supported with Perkins funds.
The State addressed all areas of the required State leadership activities of Perkins 124(b). The TEA provides funds to 20 ESCs to carry out some of the State leadership activities that support local education agencies (LEA). The remaining leadership activities are conducted by other projects and are done in conjunction with universities, program staff and other community resources.

The TEA awarded a contract to the Labor Market and Career Information (LMCI), a department of the Texas Workforce Commission, to provide 22 in-service training sessions on the application and use of the LMCI career development curriculum and the use of Texas Career Alternative Resource Evaluation System. These training sessions provided instruction for teaching the new career portals and career investigation courses, and include lesson plans for a full 16 week work course. LMCI also developed marketing materials for the new Reality Check program.

The Career and Technical Special Populations Training and Resource Education Center (CTSP) at Texas A&M University received $150,000 in Perkins funds to support special populations. The CTSP offers technical assistance with instructional resources, teaching aids and strategies to better meet the unique needs of CTE students. Services are available to school districts, charter schools, and parents. At the postsecondary level, a discretionary grant, CJ Faculty and Veteran/Military Students: A Partnership for Success was funded to recruit, support, and increase the number of veteran students in CTE non-traditional careers. Amarillo College was awarded a grant to facilitate a statewide professional development program focused on gender equity improvement. The grant focuses on the use of best practices from the Science, Technology, Engineering, and Mathematics (STEM) Equity Pipeline from National Alliance for Partnerships in Equity (NAPE).

The TEA awarded six educational excellence grants to support the improvement of rigorous CTE programs that are conducted in conjunction with University of North Texas, Stephen Austin University, and Texas A&M University. Texas Tech University received a grant called the Achieve Texas College and Career Initiative for coordinating the continued development of comprehensive programs of study. Perkins funds have been used to align almost 200 secondary and postsecondary courses to create statewide articulated advanced technical credit courses. The alignment allow students to use dual credit courses, advanced placement and international Baccalaureate courses and locally articulated courses to earn college credit.

The TEA is also a member of the Texas Workforce Investment Council (i.e. the Council) which is charged with promoting the development of a highly skilled and well-educated workforce for Texas, and assisting the Governor and the State legislature with strategic planning for and evaluation of the Texas workforce system. The 19-member Council includes representatives from business, labor, education and community-based organizations and is responsible for the delivery of 25 programs and services focused on education, workforce education, and workforce training for three participant groups: adults, adults with barriers, and youth. The Council collects and disseminates performance data and funding information on 20 workforce programs, as well as five academic education programs at the secondary and postsecondary levels. The
performance data and funding information from these five programs is used to prepare students to transition to further education or enter the workforce.

Findings:

No findings were noted.

Suggested Improvement Strategies:

Strategy #1: The TEA is strongly encouraged to develop a policies and procedures manual that compiles all relevant Federal and State statutes, rules, regulations, administrative policies, and operational procedures regarding career and technical education. A policies and procedures manual that is made available electronically via the TEA website would provide a constant reference for the administration of career and technical education programs, services, and activities at both the State and local levels.

Strategy #2: OVAE strongly encourages the TEA to consider using its performance data and funding information to better inform decisions regarding the use of State leadership funds. While the State spends its leadership funds to meet the nine required elements in section 124 (b) of Perkins IV, a careful review of State and local performance data would enable the State to more effectively tailor and optimize State leadership expenditures to address the performance shortfalls of its eligible recipients.

B. Fiscal Responsibility

Current Status

The TEA received a Perkins IV Title I basic grant award totaling $89,699,030 for program year (PY) 2011-2012, beginning on July 1, 2011. The TEA targeted 2.55 percent of its Title I funds for State administration activities and 8.74 percent for State leadership. From its State leadership funds, the TEA allotted $150,000 for non-traditional activities and $986,989 for State institutions. The remaining 88.72 percent of the Title I funds were allocated to secondary and postsecondary recipients, with 70 percent of these funds slated for the secondary level. The TEA set aside a portion of its Title I funds as a reserve under the authority of section 112 (c) at the secondary level to provide incentive grants to schools that meet or exceed State targets for selected Perkins performance indicators. At the postsecondary level, the THECB uses a small portion of reserve funds to expand and modernize career and technical education programs.

Currently, the TEA uses an accounting system that has a built in first-in/first-out (FIFO) payment system, thereby ensuring that Perkins IV grant funds from previous years are obligated and liquidated prior to the use of newer funds. Additionally, the TEA has an effective system in place to reconcile expenditures reported on its financial status reports (FSR) to general accounting ledgers maintained by the State.
The Texas legislature has demonstrated a strong financial commitment to career and technical education with annual State appropriations for secondary and postsecondary career and technical education programs.

The State has established an appropriate system for the proper allocation of grant funds to secondary and postsecondary sub-recipients by addressing the required formulas outlined in sections 131 and 132 of Perkins IV.

The TEA has made a concerted effort to reduce the level of carryover by expending a substantial portion of its section 112(a)(1) flow through funds and section 112(a)(2) State leadership funds during the first twelve months of grant availability.

**Findings:**

No findings were noted.

**Suggested Improvement Strategies:**

**Strategy #1:** The TEA should consider adopting policies and procedures to ensure that a higher percentage of its section 112 (a)(3) State administration funds are obligated and liquidated in the first year of grant award availability. This would reduce the likelihood of grant funds lapsing and being returned to the Federal government.

**Strategy #2:** The TEA should consider adopting policies and procedures to ensure that all State funds expended for career and technical education are included in its maintenance of effort calculation. More specifically, the TEA should work with the THECB to develop a handbook that explains the various funding sources that comprise the State’s effort, as well as develop a summary spreadsheet of career and technical education expenditures for each State fiscal year. The TEA and THECB should also consider developing procedures to calculate maintenance of effort on a per-student basis.

C. Local Applications

**Current Status:**

The local application process for secondary and postsecondary recipients are designed to meet the intent of the Federal legislation, facilitate local planning at both levels of the State’s delivery system for career and technical education, provide direction in the use of Federal funds for career and technical education, and document how applicants meet the assurances specified in Perkins IV. However, as noted below, Texas’s local applications fail to meet several of the necessary requirements of Perkins IV.

The State has developed generally thorough processes to review and evaluate all local applications submitted by LEAs and postsecondary institutions. Particular attention is given to low-performing grantees that need to develop and implement strategies to achieve better performance results.
Findings:

Finding #1: The TEA approved secondary local applications that failed to properly address all the requirements of Perkins IV.

Evidence: This determination was made after reviewing the State’s current secondary local application and conferring with appropriate State personnel. Our review revealed that the State’s secondary local application failed to address the requirement in section 134(b)(3)(A) that requires a description of at least one program of study that each eligible recipient is required to offer.

Relevant Sections of the Legislation: Section 134(b)(3)(A) of Perkins IV.

Corrective Action Required: The TEA must revise and submit to this office for review and approval its secondary local applications and accompanying policies and procedures to include all required descriptions found in section 134(b). The revised local applications must be the basis for the allocation of Federal funds available July 1, 2012, which may require the retroactive revisions of local applications.

Finding #2: The THECB approved postsecondary local applications that exceeded the five percent limitation the Act places on use of Federal funds for local administration pursuant to Perkins IV.

Evidence: This determination was made after reviewing the State’s current postsecondary local applications and conferring with appropriate State personnel. It was revealed that postsecondary institutions included only indirect costs in their calculation of local administration using Federal funds and, in so doing, met the five percent limitation pursuant to Perkins IV. However, when adding in, as required under Perkins IV, direct costs for salaries, fringe benefits, and travel, a number of postsecondary recipients expend more than the five percent allowed under Perkins IV.

Relevant Sections of the Legislation: Section 135(d) of Perkins IV.

Corrective Action Required: The TEA must require the THECB to revise its postsecondary local application and relevant policies, and procedures to include both direct and indirect costs as part of allowable local administration costs. The revised THECB postsecondary local application and procedures must be submitted to this office for review and approval. Please note that the revised local applications must be the basis for the allocation of Federal funds available July 1, 2012, which may require the retroactive revisions of local applications.

Suggested Improvement Strategies:

Strategy #1: The TEA is strongly encouraged to consider refining its definition of “size, scope, and quality” for approved programs, services, and activities, with “size” predicated on a minimum student participation level, while “scope” could be tied more closely with the concept of “programs of study.” In addition, the “quality” element could be more closely aligned to...
performance results that are now part of the State’s accountability system; perhaps linking “quality” with placement or graduation rates.

**Strategy #2:** The TEA should encourage the THECB to develop a simplified, consolidated budget matrix as part of its application as a way to expand the fiscal information available as it reviews and approves funding for its eligible recipients. Currently, the use of a budget matrix is only required for the final reports required of postsecondary recipients.

**D. Accountability**

**Current Status:**

At the time of submission of its December 31, 2011, Consolidated Annual Report (CAR), covering PY 2009–10, the TEA met its State-adjusted performance levels with the exception of secondary technical skill attainment (2S1) and postsecondary credential, certificate or degree attainment (2P1) (see Table 1 below). The State did not meet these performance levels by the 90 percent threshold allowed under Perkins IV for 2S1 for the second consecutive year, and for 2P1 for the first time. The State was required to implement a program improvement plan pursuant to section 123(a)(1) of Perkins IV.

**TABLE 1**

**PERFORMANCE LEVELS AND ACTUAL PERFORMANCE:**

*Program Year 2009-2010*

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator</th>
<th>Grand Total Student Numerator</th>
<th>Grand Total Student Denominator</th>
<th>Grand Total Performance Levels</th>
<th>Grand Total -Actual Performance *Failed to meet performance level by the 90% threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Secondary Level</strong></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>1S1</td>
<td>Academic Attainment Reading/ Language Arts</td>
<td>120,279</td>
<td>122,255</td>
<td>95.00%</td>
<td>98.38%</td>
</tr>
<tr>
<td>1S2</td>
<td>Academic Attainment Mathematics</td>
<td>116,739</td>
<td>122,255</td>
<td>95.00%</td>
<td>95.49%</td>
</tr>
<tr>
<td>2S1</td>
<td>Technical Skill Attainment</td>
<td>24,106</td>
<td>36,475</td>
<td>81.33%</td>
<td>66.09%*</td>
</tr>
<tr>
<td>3S1</td>
<td>Secondary School Completion</td>
<td>128,957</td>
<td>134,035</td>
<td>90.66%</td>
<td>96.21%</td>
</tr>
<tr>
<td>4S1</td>
<td>Student Graduation Rate</td>
<td>129,949</td>
<td>135,813</td>
<td>89.91%</td>
<td>95.68%</td>
</tr>
<tr>
<td>5S1</td>
<td>Student Placement (postsecondary, military, employment)</td>
<td>95,708</td>
<td>135,813</td>
<td>78.25%</td>
<td>70.47%</td>
</tr>
<tr>
<td>6S1</td>
<td>Nontraditional Participation</td>
<td>133,804</td>
<td>321,730</td>
<td>38.84%</td>
<td>41.59%</td>
</tr>
<tr>
<td>6S2</td>
<td>Nontraditional Completion</td>
<td>66,880</td>
<td>166,903</td>
<td>38.40%</td>
<td>40.07%</td>
</tr>
</tbody>
</table>
An analysis of the State’s data disaggregated by gender revealed that females met the 90 percent threshold for all core indicators with the exception of technical skills attainment (2S1) and attainment of a credential, certificate or degree (2P1); the same indicators missed by the State as a whole. Males, in addition to 2S1 and 2P1, missed the threshold for two additional indicators: placement in postsecondary, military or employment (5S1), and postsecondary nontraditional completion (5P2).

An analysis of the State’s data by indicator revealed that the following core indicators were missed by the racial/ethnic subgroups indicated by shaded cells:

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator</th>
<th>American Indian/Alaskan Native</th>
<th>Asian</th>
<th>Black / African American</th>
<th>Hispanic / Latino</th>
<th>Native Hawaiian/other Pacific Islander</th>
<th>White</th>
</tr>
</thead>
<tbody>
<tr>
<td>2S1</td>
<td>Technical Skills Attainment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5S1</td>
<td>Student Placement (postsecondary, military, employment)</td>
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</table>

### Postsecondary

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator</th>
<th>American Indian/Alaskan Native</th>
<th>Asian / Pacific Islander</th>
<th>Black not Hispanic</th>
<th>Hispanic</th>
<th>White</th>
<th>Unknown</th>
</tr>
</thead>
<tbody>
<tr>
<td>2P1</td>
<td>Credential, Certificate, or Degree</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>3P1</td>
<td>Student Retention or Transfer</td>
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</tbody>
</table>
An analysis of the State’s data by indicator revealed that the following core indicators were missed by the special population subgroups indicated by shaded cells:

**Secondary**

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator</th>
<th>Individuals with Disabilities</th>
<th>Economically Disadvantaged</th>
<th>Single Parents</th>
<th>Displaced Homemakers</th>
<th>Limited English Proficient</th>
<th>Migrant</th>
<th>Nontraditional</th>
</tr>
</thead>
<tbody>
<tr>
<td>1S1*</td>
<td>Academic Attainment Reading/ Language Arts</td>
<td></td>
<td></td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>1S2**</td>
<td>Academic Attainment Mathematics</td>
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<td>2S1</td>
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- **1S1***: Although LEP students missed this indicator, they have increased performance from 67.53% in 2008 to 82.06% in 2011; however, IDEA students’ performance dropped from 80.68% in 2008 to 77.91% in 2011)
- **1S2**: Although LEP students missed this indicator, they have increased performance from 70.66% in 2008 to 80.55% in 2011; however, IDEA students’ performance dropped from 61.38 in 2008 to 42.82% in 2011)

**Postsecondary**

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator</th>
<th>Americans with Disabilities</th>
<th>Economically Disadvantaged</th>
<th>Single Parents</th>
<th>Displaced Homemakers</th>
<th>Limited English Proficient</th>
<th>Migrant</th>
<th>Nontraditional</th>
</tr>
</thead>
<tbody>
<tr>
<td>2P1</td>
<td>Credential, Certificate, or Degree</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>4P1</td>
<td>Student Placement (postsecondary, military, employment)</td>
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</tr>
<tr>
<td>5P1</td>
<td>Nontraditional Participation</td>
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<td></td>
</tr>
<tr>
<td>5P2</td>
<td>Nontraditional Completion</td>
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</table>
The Texas Education Agency requested no revisions for performance level, definitions, or measurement approaches for PY 2010-11.

The State places high priority on data accuracy, completeness, and reliability through their secondary and postsecondary data management systems. Data analysis, technical assistance and monitoring are being used to strengthen the capacity of secondary and postsecondary sub-recipients of Perkins funds to review and analyze data to inform planning and decision making.

At the secondary level, TEA operates the Public Education Information Management System (PEMIS), a database containing enrollment and performance information from LEAs. This system employs various edit checks that screen recipient data for omissions and anomalies that are then followed up by TEA staff for resolution. The PEMIS database information is then used by the Career and Technology Education Reports (CETR), providing performance feedback to LEAs. The CETR in conjunction with the TEA’s electronic local application, provides a structure for the TEA to provide LEAs with three years of past student performance data, which assists these LEAs to better assess the progress of their CTE students. The electronic local application also facilitates analysis of student performance data as a basis for more effective local plan development.

The TEA’s PBMAS staff is responsible for analyzing and rating the LEA’s data submissions. This rating score drives the performance-based monitoring system that establishes graduated interventions based on PBMAS ratings. The rating determines the type of intervention from the TEA and the action required on the part of the LEA. Recently, the monitoring system was enhanced by integrating the special education and English language learners programs into the assessment so that student performance would be addressed systematically, examining disaggregated student performance across programs through the review process. The ESC for a given region also provides input into data gathering for the intervention, participates in any on-site monitoring, and provides professional development and technical assistance to the LEA’s. This wrap around system is proving very effective in improving results for students and, in turn, LEAs.

At the postsecondary level, the THECB uses the Coordinating Board Management (CBM) system for data input. This data is monitored for completeness and accuracy and compared to previous data for consistency by THECB data specialists. The annual State Conference for Registrars, accountability meetings held twice a year, webinars and star link video training sessions provide technical assistance and guidance regarding changes in the reporting system, and work to improve data collection and reporting by institutions. The THECB staff conducts on-site visits for monitoring of the Perkins Basic Grant sub-recipients on a four-year cycle. Program year 2011-2012 is the fourth year of the four-year cycle. Beginning with PY 2012-2013, staff will determine the sub-recipient site visit schedule based on a risk assessment. Risk assessment factors are still being determined, but will include, at a minimum, the number of core indicators of performance not being met, the number of years since the last site visit, and the number of late reports submitted the previous year.
Findings:

No findings were noted.

Suggested Improvement Strategies:

Strategy #1: The TEA is strongly encouraged to consider including in their electronic local application, disaggregate student performance data for gender groups, ethnicities or special populations whose performance on any core indicator falls below the 90% threshold, or shows gaps or disparities in comparison with the sub-recipients aggregate performance. While the current electronic local application assists LEAs in developing a comprehensive plan for continuous improvement that includes activities and initiatives for improvement of those targeted performance indicators missed at the aggregate level; the addition of disaggregate information would provide more comprehensive data that would target student groups whose performance is overshadowed by the aggregate figures, and provide information for more comprehensive program improvement plans including specific targeted initiatives.

E. Special Populations

Current Status:

State leadership funds are used to provide professional development to help ensure effective outcomes for special populations. These funds support the Career and Technical Special Populations Training and Resource Center at Texas A&M University, which provides professional development training related to serving special populations on topics such as counseling, tutoring, career exploration, accommodations and modifications for students with disabilities, and other appropriate services. In addition, ESC career and technical education specialists provide direct technical assistance and professional development to school district personnel in their regions. The TEA career and technical education web site provides up-to-date information on opportunities for professional development.

At the secondary level, the TEA’s local application contains assurances for funding eligibility that require school districts to note their program strategies for special populations. The PBMAS annually monitors the academic performance and graduation rates of every school district’s CTE participants including the following special populations: limited English proficient (LEP), economically disadvantaged, special education, and nontraditional students. The TEA reported on its 2009-10 CAR that 95.68% percent of all students graduated from high school. In addition, students in many of the special population categories described in Section 3(29) of Perkins IV performed at or near the statewide average for academic attainment.

At the postsecondary level, supplementary support services are provided for identified special population students. These services include mentoring, career guidance, elder/child care services, textbooks, transportation, and tutoring. Students have an opportunity to identify their needs on enrollment forms and efforts are made to encourage students with special needs to contact appropriate college staff to receive the available services that can help them succeed in occupational and academic programs. In addition, Perkins State leadership funds at the
postsecondary level are distributed for statewide projects through a Request for Application (RFA) process and are used to develop innovative ways of closing the achievement gaps of special population students.

**Findings:**

No findings were noted

**Suggested Improvement Strategy:**

*Strategy # 1:* The TEA is strongly encouraged to consider revising both its postsecondary local application and its State leadership grant application to include definitions of the special populations to be addressed and served by the applicants to enhance the validity and reliability of information provided across local programs.

*Strategy # 2:* The TEA is strongly encouraged to consider revising its secondary local application to ensure that all special populations are identified and sufficient resources are targeted to serve these students. Specifically, Part 6 of the local application could be expanded to include definitions of the special populations to be addressed and served by the applicants. In addition, the TEA should consider revising the equitable access and participation section of the secondary local application to include a narrative section to describe the needs assessment used to identify barriers and provide disaggregated data on the special populations identified.

*Strategy #3:* The TEA is strongly encouraged to consider revising its contract with CTSP to identify barriers and develop strategies for school districts that include all categories of special population students. More specifically, the CTSP conducts a needs assessment based on feedback from teachers who choose to respond. The TEA should also consider sharing special population performance data with the CTSP in order to improve special population outcomes.

**F. Programs of Study**

**Current Status**

Achieve Texas is the State’s college and career education initiative to prepare all students for secondary and postsecondary opportunities, career preparation and advancement, meaningful work, and active citizenship. It has transformed the way career and technical education is organized and delivered in Texas by expanding career and technical education from its traditional six program areas to 16 career clusters that correspond with the those identified by the National Association for State Directors of Career and Technical Education Consortium (NASDCTEc) and that are recognized by OVAE.

Programs of study in Texas are organized, created, and aligned with the State's 16 career clusters. They are delivered in a variety of settings including: small learning communities, academies, magnet schools and comprehensive high schools. The State goes well beyond the basic legislative requirements for programs of student by incorporating the 10 design principles
outlined in OVAE non-regulatory guidance for rigorous POS (see http://cte.ed.gov/nationalinitiatives/rpos.cfm).

Although Texas considers itself a local control state, the Texas State Legislature in May 2007 passed House Bill 3485 requiring the TSBOE by rule to create common learning standards, which included career and technical education. These common career and technical education learning standards align with the career cluster standards and are part of the Texas Essential Knowledge and Skills (TEKS), which identify learning standards for all subject areas. Each POS provides a sequence of courses aligned with the common required standards and begin with a principles (introductory) course. The principles course follows the "broad to narrow" approach outlined in the career cluster foundation standards and the POS design framework.

As part of the on-site review, OVAE staff conducted seven on-site visits. Each visit began with an orientation meeting with local secondary and postsecondary administrators, faculty and employers. During each meeting, the expectations of the Perkins legislation were discussed. In addition, the POS design framework was used as a guide to discuss the local POS implementation. At each site the local POS aligned very well with components of the design framework. At the conclusion of each meeting, a site tour was provided, which gave OVAE staff an opportunity to see facilities, and visit with teachers and students. The sites visited included an inner city school in San Antonio; several rural schools including Killeen and Waco; and suburban sites in Arlington and Austin. A variety of career cluster areas were visited including: information technology; health science; manufacturing; agriculture, foods and natural resources; hospitality and tourism; STEM; education and training; and transportation, distribution and logistics.

All of the sites visited utilized POS templates following the college and career transitions initiative (CCTI) model. These models demonstrated connections between secondary and postsecondary education including dual credit opportunities. Dual credit options were offered to students through articulation agreements in most cases, within the region. Statewide articulation agreements are not in place at this time and will likely be difficult to create due to the size of the state the large number of postsecondary institutions.

**Findings:**

No findings were noted

**Suggested Improvement Strategies:**

*Strategy # 1:* The TEA is strongly encouraged to include secondary technical skill assessment that result in secondary or postsecondary credit in its definitions and reporting on Students technical skill proficiency. At present, the TEA only reports on student performance on secondary technical skill assessments that result in industry certifications.