

IV. ADMINISTRATION AND EVALUATION

A. Statutory Requirements

- 1. Describe the procedures the eligible agency will use to obtain input from eligible recipients in establishing measurement definitions and approaches for the core indicators of performance for career and technical education students at the secondary and postsecondary levels, as well as for any other additional indicators of performance identified by the eligible agency. [Sec. 113(b)(1)(A)-(B), sec. 113(b)(2)(A)-(C)]**

The Division of Career Education posted the proposed measurement definitions and approaches for the core indicators of performance on the Department of Elementary and Secondary Education Web site for input. The Division used an Internet-based survey to gather input. The Division notified the following organizations/associations/groups when the proposed measurement definitions and approaches for the core indicators were available for review and solicited input through educational organizations such as Missouri Association of Career and Technical Education, Missouri Community College Association, and Missouri Association of Secondary School Principals. In addition, an announcement was included in the Commissioner of Education's letter to school administrators asking them for their input.

Division staff met with the community college career and technical education deans in December 2006 to review the Perkins IV legislation with specific discussion on the postsecondary measurement definitions and approaches for the core indicators of performance. There was also discussion around the definition of high-wage, high-demand, and high-skill occupations in Missouri.

Additional input was solicited from stakeholders through the normal communication channels and public hearings.

- 2. Describe the procedures the eligible agency will use to obtain input from eligible recipients in establishing a State adjusted level of performance for each of the core indicators of performance for career and technical education students at the secondary and postsecondary levels, as well as State levels of performance for any additional indicators of performance identified by the eligible agency. [Sec. 122(c)(10)(A), sec. 113(b)(3)(B)]**

The state-adjusted levels of performance for academic attainment (communication arts/reading and mathematics) and graduation rates for Perkins IV will align with No Child Left Behind. Regional meetings were conducted throughout the state soliciting input on establishing state-adjusted levels of performance for all other indicators. It was determined that a baseline will be established for each core indicator using three-year average performance, when available. When data are not available, the state will establish a baseline from estimates and projections using data from related databases.

Division staff met with the community college career and technical education deans in December 2006 to review the Perkins IV legislation with specific discussion on the postsecondary measures and the definition of high-wage, high-demand, and high-skill occupations in Missouri. Again, regional

meetings were conducted throughout the state soliciting input on establishing state-adjusted levels of performance for postsecondary measures.

Additional input was solicited from stakeholders through various communication means and public hearings.

- 3. Identify, on the forms in Part C, the valid and reliable measurement definitions and approaches that the eligible agency will use for each of the core indicators of performance for career and technical education students at the secondary and postsecondary/adult levels, as well as any additional indicators of performance identified by the eligible agency, that are valid and reliable. Describe how the proposed definitions and measures are valid and reliable. [Sec. 113(b)(2)(A)-(B)]**

See Part C, page 80, for the measurement definitions and measurement approaches for all secondary and postsecondary performance indicators. The definitions and measures can be collected through the Missouri Student Information System (MOSIS) system for most indicators. Additional data is collected through the state Core Data system. These systems have proven to be valid and reliable.

Division of Career Education staff have met and continue to meet with the appropriate Department staff regarding how to collect the data for Perkins IV accountability through MOSIS, which is being developed by the Department of Elementary and Secondary Education. When fully implemented, MOSIS will help school districts maintain more accurate information and manage student data more efficiently, including the Perkins accountability measures.

Technical skill assessments are offered in all Career and Technical Education (CTE) programs. Currently, Missouri uses a variety of methods to assess technical skill attainment including State and/or Local competency profiles, grade point average, locally-developed assessments and third-party administrator examinations. Beginning in FY09, the State will start phasing in third-party, industry-recognized assessments for all CTE programs. Over the next four years, the State anticipates increasing the number of secondary completers taking the industry-recognized skill assessment by 25% each year; with a goal of 100% in four years. Similarly, industry-recognized skill assessments for postsecondary and adult CTE students will increase at a rate of 33% each year for the next three years with a goal of 100%. Missouri will incorporate assessment tools developed by national organizations, such as the American Association of Family and Consumer Sciences (AAFCS), Skills USA, and NOCTI. The State will continually monitor and select/incorporate new assessments as they become available and if appropriate.

- 4. Describe how, in the course of developing core indicators of performance and additional indicators of performance, the eligible agency will align the indicators, to the greatest extent possible, so that information substantially similar to that gathered for other State and Federal programs, or for any other purpose, is used to meet the Act's accountability requirements. [Sec. 113(b)(2)(F)]**

The staff in the Division of Career Education recommends and supports the development of measures, data collection, and reporting through the processes already being used. Additionally, it is the intent of the Division staff to use existing processes to reduce duplication of effort and use consistent and

reliable data. Additional input on alignment and duplication was solicited from stakeholders in the Department of Elementary and Secondary Education as well as through the normal communication methods and public hearings.

- 5. On the forms provided in Part C provide, for the first two years covered by the State Plan (July 1, 2007 – June 30, 2008 and July 1, 2008 – June 30, 2009), performance levels for each of the core indicators of performance, except that States submitting one-year transition plans are only required to submit performance levels for part of the indicators as discussed above. For performance levels that are required, the States’ performance levels, at a minimum, must be expressed in a percentage or numerical form, so as to be objective, quantifiable, and measurable; and require the State to continually make progress toward improving the performance of career and technical education students. [Sec. 113(b)(3)(A)(i)-(II)]**

States’ performance levels are listed as percentages and require the State to continually make progress toward improving the performance of career and technical education students.

Section 113(b)(2) of the Perkins Act requires a State to develop valid and reliable core indicators of performance, to propose performance levels in its State Plan, and to reach agreement with the Department on “adjusted performance levels” for each of the core indicators. In so doing, the Perkins Act prescribes the measures that a State must use for some of the core indicators.

- a. Section 113(b)(2)(A)(i) of the Perkins Act requires a State to measure career and technical education students’ attainment of “challenging academic content standards” and “student academic achievement standards” that a State adopted pursuant to Section 1111(b)(1) of the ESEA. The Perkins Act further requires a State use its State’s academic assessments (i.e. the State’s reading/language arts and mathematics tests) implemented under Section 1111(b)(3) of the ESEA to measure career and technical education students’ attainment of these State standards. Thus, a State’s core indicators must include career and technical education students’ proficiency in reading/language arts and mathematics as measured under 1111(b)(1) and (3) of the ESEA. Accordingly, under the Perkins Act, a State must report the number or percent of its career and technical education students who score at the proficient level or above on the State’s assessments in reading/language arts and mathematics administered under the ESEA to measure the academic proficiency of secondary career and technical education students against the ESEA standards.**

To measure attainment of these standards, a State must develop and reach agreement with the Department on “adjusted performance levels,” which constitute the State’s performance targets for a program year. Permissible targets (i.e. “adjusted performance levels”) would be a State’s “annual measurable objectives” (AMOs) from its State’s ESEA accountability workbook. (To ensure that a State’s schools are making “adequate yearly

progress” (AYP) as required under Section 1111(b)(2)(A) of the ESEA, Section 1111(b)(2)(G) of the ESEA requires a State to establish Statewide AMOs, which identify a single minimum percentage of students who are required to meet or exceed the proficient level on the State’s academic assessments each year.) Under the Perkins Act, a State may propose different performance levels (targets) instead of its AMOs as discussed below.

It is the State’s intent to use the exact information, processes, and reporting used for No Child Left Behind for Perkins accountability through use of Missouri Student Information System (MOSIS), as described on page 33.

The Division of Career Education agreed that lower standards for career and technical education students would not send the correct message to stakeholders. The consensus at this time is to adopt the Annual Yearly Progress (AYP) cut scores approved by the State Board of Education. For reporting of No Child Left Behind data, the Department of Elementary and Secondary Education has proposed a uniform minimum cell size of 50 to replace the following:

- Thirty is the minimum number of students in a subgroup for reporting purposes.
- The required number of students in a subgroup for accountability purposes is thirty.
- In order to provide more validity and reliability to decisions about AYP based on subgroups, Missouri will use a cell size of 50 for students who are English Language Learners (ELL) and students with disabilities.

b. Section 113(b)(2)(A)(iv) of the Perkins Act requires a State to identify a core indicator to measure for its career and technical education students at the secondary level “student graduation rates (as described in Section 1111 (b)(2)(C)(vi) of the [ESEA]).” Thus, a State must report the number or percent of its career and technical education students whom the State includes as graduated in its graduation rate described under the ESEA. To ensure that a State’s schools are making AYP as required under Section 1111(b)(2)(A) of the ESEA, some States have established Statewide targets for graduation rates under Section 1111(b)(2)(C)(vi), and others States have defined AYP only to require improvement in the graduation rate each year.

It is the intent of the Division of Career Education to use the same information, processes, terminology, and reporting procedures currently used in Missouri for No Child Left Behind purposes. It is our intent to compare graduation rates and develop disaggregated reports comparing Missouri career and technical education and non-career and technical education populations. It is also our intent that the reports will have the same format as used for the Adequate Yearly Progress indicators in Missouri. The State Board of Education has approved proficiency standards for communication arts/reading and mathematics through the 2013-2014 school year.

Missouri uses the definition of graduation rate from the National Center for Education Statistics: The quotient of the number of graduates in the current year as of June 30 divided by the sum of the number of graduates in the current year as of June 30 plus the number of twelfth-graders who dropped out in the current year plus the number of eleventh-graders who dropped out in the preceding year plus the

number of tenth-graders who dropped out in the second preceding year plus the number of ninth-graders who dropped out in the third preceding year. Students who obtain a GED are counted as dropouts in this calculation.

The State Board of Education established the graduation rate of 85%. Schools will be considered as having met Annual Yearly Progress if they meet or exceed 85% or if they have made improvement from the previous year. The state graduation rates for the last three years are: 2003-2004, 85.5%; 2004-2005, 85.9%; and 2005-2006, 85.7%.

6. Describe the eligible agency's process for reaching agreement on local adjusted levels of performance if an eligible recipient does not accept the State adjusted levels of performance under Section 113(b)(3) of the Act and ensuring that the established performance levels will require the eligible recipient to continually make progress toward improving the performance of career and technical education students. [Sec. 113(b)(4)(A)(i)(II); sec. 122(c)(10)(B)]

Perkins IV requires States to negotiate with the local eligible recipients on levels of performance for the eight secondary indicators and the six postsecondary indicators. For three of these indicators (1S1 – Academic Attainment-Reading/Language Arts; 1S2 – Academic Attainment-Mathematics; and 4S1 – Student Graduation Rates) the performance levels are already established under No Child Left Behind and no negotiations will be conducted.

The local eligible recipient's previous performance will be used to establish their baseline. The baseline will be the rolling average performance of the three previous years when available. When the data are not available, the baseline will be the same as the state baseline (i.e., postsecondary retention and transfer.)

Local eligible recipients will not be allowed to negotiate an adjusted level of performance below its baseline. If the local eligible recipient is performing **above** the state baseline, the adjusted performance level will be to meet or exceed the three-year rolling average of performance. If the local eligible recipient is performing **below** the State baseline, the adjusted level of performance will be a minimum of a two-percentage point increase over the established baseline per year. The ultimate goal is to reach the State baseline.

7. Describe the objective criteria and methods the eligible agency will use to allow an eligible recipient to request revisions to its local adjusted levels of performance if unanticipated circumstances arise with respect to an eligible recipient. [Sec. 113(b)(4)(A)(vi)]

In the event of unanticipated circumstances, the eligible recipient can apply for a one-year waiver from the core indicators. The waiver or "hold-harmless" provision will be a placeholder and may be extended depending on the nature of the unanticipated circumstances. The waiver will be considered by the Division of Career Education's Administration and Accountability Services section. The criteria for a waiver includes:

- Recipient falling below the agreed upon level of performance;

- An unanticipated circumstance that can be documented that would have an impact on performance levels, such as natural disaster, epidemic, serious illness or death of a faculty member; or
- Local recipient has formally requested a change in performance levels to the Division of Career Education. If more than a one-year waiver is necessary, the State will evaluate the need to renegotiate the agreed upon levels of performance.

8. Describe how the eligible agency will report data relating to students participating in career and technical education programs in order to adequately measure the progress of the students, including special populations and students participating in Tech Prep programs, if applicable, and how the eligible agency will ensure that the data reported from local educational agencies and eligible institutions, and the data that are reported to the Secretary, are complete, accurate, and reliable. [Sec. 122(c)(13); sec 205].

The timeline and format of the disaggregated career and technical education reports will be aligned to the extent possible with the Annual Yearly Progress (AYP) reports published by the Department of Elementary and Secondary Education. Examples of Missouri's Annual Yearly Progress format can be viewed at http://dese.mo.gov/divimprove/assess/AYP_Grid.pdf.

The appropriate staff members in the Divisions of Career Education and School Improvement will continue to meet to review the data elements for reliability and validity as they relate to programs, schools, and the state level.

The Division of Career Education continues to move from data collection and reporting for compliance to focus on program improvement.

9. Describe how the eligible agency plans to enter into an agreement with each consortium receiving a grant under Perkins IV to meet a minimum level of performance for each of the performance indicators described in Section 113(b) and 203(e) of the Act. [Sec. 204(e)(1)]

Individual recipients and consortiums are treated the same regarding the levels of performance. Each school district in a consortium will be required to submit data on the core indicators of performance and may negotiate separately on their levels of performance with their fiscal agent.

10. Describe how the eligible agency will annually evaluate the effectiveness of career and technical education programs, and describe, to the extent practicable, how the eligible agency is coordinating those programs with other Federal programs to ensure non-duplication. [Sec. 122(c)(8)]

The Division of Career Education has three opportunities to evaluate and provide technical assistance to local educational agencies, including career education programs.

1. Missouri School Improvement Program

The Missouri School Improvement Program (MSIP) has the responsibility of reviewing and accrediting the 524 school districts within a 5-year review cycle. The process of accrediting school districts is mandated by state law.

Districts are reviewed on a five-year cycle using three sets of standards which are designed to promote excellence in all Missouri public schools. These standards are resource, process, and performance. The resource standards address the basic requirements that all districts must meet and are quantitative in nature. The process standards address the instructional and administrative processes used in schools. The performance standards include multiple measures of student performance and include academic achievement, reading achievement, ACT achievement, career preparation, and educational persistence.

The final component of the MSIP process is the Comprehensive School Improvement Plan (CSIP) http://www.dese.mo.gov/divimprove/sia/msip/CSIP_Manual.pdf. The written CSIP directs the overall improvement of a district's educational programs and services.

As part of the MSIP process, the Division of Career Education requires all career education programs to complete the *Report for Local Program Quality Improvement* <http://dese.mo.gov/divcareered/msip.htm>. The report serves as a tool for school districts to use for program improvement and planning. Aligned with the *Common Standards for Career Education Programs* http://dese.mo.gov/divcareered/Common_Program_Standards.pdf, the report is used to review local career education programs to determine where exemplary programs and activities exist and where improvements should be made. Findings from the report are used in the district's CSIP for career education program improvement.

2. Perkins Technical Assistance Reviews

Each fiscal year, the Division of Career Education conducts Perkins Technical Assistance Visits (TAVs). The TAVs are completed for secondary, postsecondary, and Tech Prep programs. The primary purpose of the TAVs is to assess the eligible recipient's compliance with the provisions of the Perkins Act and to offer assistance in all areas of program administration. This is accomplished by reviewing the eligible recipient's financial and accountability records to ensure that the eligible recipients are spending Perkins dollars in an appropriate manner and have an accountability system in place to gather data as it relates to the Perkins core indicators of performance.

Prior to the TAV, the Division sends a letter to the eligible recipient informing them of the date of the visit, the Division staff attending the visit, and a general overview of the visit. The letter also references the *Required Documentation Sheet*. This sheet indicates the required documentation for the TAV. The eligible recipient is to use this document as a guide for preparing for the TAV.

Two areas of documentation are reviewed during the TAV:

- Accountability Review

The intent is to verify that the Perkins data being reported to the Division of Career Education are consistent with the definitions for participants, concentrators, and completers.

Nontraditional participation/completion data are reviewed to determine if the students reported are consistent with the nontraditional programs identified by the Division of Career Education.

The eligible recipients are to describe the process used to gather placement data. Students that were not positively placed are to be reported as status unknown, not employed, or not available.

- Financial Review

A finance worksheet is utilized to document the review. This worksheet is divided into the following categories: records management, allowable costs, time and effort reporting, equipment, and miscellaneous. In addition, a finance interview questionnaire is completed with the eligible recipient.

The following documentation is reviewed for the prior two years and the current year:

- accounting records (financial reports, ledgers, accounts, etc.);
- requisitions, purchase orders, invoices, etc.;
- monthly time sheets;
- semi-annual time certifications;
- job descriptions;
- inventory records; and
- any additional financial information supporting the Perkins grant.

At the conclusion of the TAV, an exit conference is conducted with the eligible recipient. During the exit conference, Division staff provides an overview of the visit which consists of the areas that were reviewed and any concerns and/or best practices that were noted.

After returning to the Department, the Division staff compiles the information gathered from the TAV and prepares a final report of the review. The final report is comprised of two sections, accountability and financial. In each section of the report, any findings and corrective action necessary are identified. The final report is then sent to the eligible recipient with a cover letter. The letter basically thanks the eligible recipient for their courtesy, restates the purpose of the visit, and references the final report.

To document the TAV for the Perkins grant, the Division of Career Education maintains a central file to keep documentation from the review.

Division staff includes the following documentation in the file for each TAV:

- correspondence with the eligible recipient regarding the TAV;
- application, budget, and final expenditure report for the year(s) of the TAV;
- accountability data for the year(s) of the TAV;
- finance worksheet;
- interview questions and responses (accountability and finance);
- notes from TAV;
- copies of eligible recipient records that support any findings (if applicable);
- final report; and
- corrective action plan (if applicable).

If any findings and corrective actions are noted in the Perkins final report, the eligible recipient is required to submit, in writing, a corrective action plan (CAP) that addresses these issues. Therefore, within 45 business days of receipt of the Perkins final report, the eligible recipient must submit a detailed CAP, with timelines and persons involved, indicating the steps to be taken to address the findings and recommendations.

Division staff then reviews the CAP to ensure that the plan is sufficient and that all the findings have been adequately addressed. If acceptable, staff will include the CAP in the central file along with the other documentation for the eligible recipient. If not acceptable, Division staff will contact the eligible recipient for additional information and/or documentation.

Once the anticipated completion date for corrective action has occurred, Division staff will contact the eligible recipient to ensure that the corrective action has been implemented. This follow-up will be handled via a phone call or an e-mail. To verify that the CAP has been completed, the eligible recipient may be required to submit additional documentation to the Division. This documentation would be included in the central file with the other monitoring documentation. If additional documentation is not required, staff will document the follow-up with the eligible recipient and include it in the central file. In addition, during the eligible recipient's next Perkins TAV, the Division will review the findings with the eligible recipient and ensure the necessary corrective action has been properly implemented.

3. High Schools That Work Technical Assistance Visits

Missouri is among 32 states that participate in the *HSTW* network. *HSTW* is an effort-based school improvement initiative founded on the conviction that most students can master rigorous academic and career/technical studies if school leaders and teachers create an environment that motivates students to make the effort to succeed. Currently, Missouri has 37 high schools and six area career centers that are participating in *HSTW*.

As part of the *HSTW* process, districts that are part of the network must undergo a Technical Assistance Visit (TAV) sometime during their first two full years of operation. The TAV is conducted by a team of professional educators, including Division staff, who are knowledgeable of the *HSTW* primary goals, key practices, and key conditions. The *HSTW*

TAV determines the extent to which the school is currently implementing key, research-based practices, and has certain key conditions in place supporting improved student achievement. Other less formal technical assistance activities include onsite visits by program staff at the request of an individual school district or teacher. Division staff provides updates at professional teacher association meetings and conferences and regional program area meetings. There are also discussion lists on Division-sponsored listservs.