

National Organization for Women

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Office of Vocational and Adult Education
Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Comment on *Guide for the Submission of State Plans Pursuant to the Carl D. Perkins Career and Technical Education Act of 2006*.
“OMB Control #: (03212) 1830-0029-v.3”

Dear Assistant Secretary Troy Justesen:

I am writing on behalf of the National Organization for Women (NOW) and NOW Foundation to express concern about the second edition of the Carl D. Perkins Career and Technical Education Improvement Act of 2006 State Plan Guide. As an organization that has worked for four decades to promote opportunities for women and girls in education, NOW and NOW Foundation object to the proposal by the Office of Vocational and Adult Education (OVAE) decision to weaken the core indicator on non-traditional training – the primary accountability mechanism for gender equity in career and technical education (CTE) – by collapsing performance measures on participation and completion into one single performance measure. This change, if enacted, would have significant negative consequences for gender equity in career and technical education and is completely unwarranted. Since the Department has previously stated its desire for evidence-based education policy, the move towards less measurement is inexplicable. We agreed with the Department’s earlier position in support of education policy based on solid empirical evidence and believe that this change in performance measures will not provide sufficient data on which to base future decisions.

Curtailing accountability for equity in non-traditional training makes no sense when women and girls continue to be vastly underrepresented in CTE programs that are non-traditional for their gender. Women and girls still face significant discrimination and sex stereotyping as they attempt to enroll in and complete career and technical education programs. That fundamental fact is well documented. Nationwide, a majority of female CTE students are clustered into occupational training programs that leave them less prepared to enter high-wage careers. In New Jersey, for example, girls represent only two percent of those studying to become automotive technicians. In Maryland, 14,843 girls are taking child care courses, while only 381 are enrolled in construction and repair and automotive classes. Nationally, girls make up 87 percent of students in traditionally female fields and only 15 percent of those in traditionally male fields. Thirty-five years after the adoption of legislation reflecting a national consensus to support educational equity, these dramatic gender-based differences are unacceptable.

A two-part measure is needed to hold States fully accountable for making progress toward eliminating sex-segregation in CTE. When Congress created the non-traditional core indicator in 1998, it established two separate accountability measures to ensure that: 1.) sufficient numbers of students are being recruited into non-traditional programs, and 2.) students who enroll in non-traditional training succeed in and complete these programs. Increasing participation in non-traditional training programs and facilitating completion of these programs are distinctive goals, with different challenges that require separate programming efforts to address. For example, outreach activities and unbiased career counseling can help to encourage more women and girls to enroll in non-traditional training programs. However, other critical interventions— such as professional development for teachers, mentoring, parental involvement, and peer support programs – are necessary to facilitate female students’ success in these programs.

It is important that states be held accountable in both of these areas – participation and completion – so that states and schools have incentives to provide the full range of programming necessary to combat women’s under-representation in training programs that are non-traditional for their gender.

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Maintaining the two-part measure reflects Congressional intent and previous legislative interpretation. The legislative language pertaining to the non-traditional indicator in Perkins IV is substantively unchanged from Perkins III. Under Perkins III, the non-traditional indicator was implemented as a two-part accountability measure. Absent a change in the legislation, the measure collection methodology should stay the same. In fact, that OVAE's first release of the State Plan Guide maintained separate participation and completion accountability elements is further evidence that this interpretation is supported by Congressional intent and previous legislative interpretation.

Altering the non-traditional indicator could effectively excuse states from any real accountability for gender equity over the next six years. Because collapsing non-traditional participation and completion will effectively create a new performance measure, states will not be able to collect the baseline data necessary to negotiate their performance levels with the Department of Education until the 2007-2008 school year. As a result, states will not be held accountable for their performance until December of 2009 – when they report their first year of performance data. Thus, the first time a state could be eligible for sanctions for failing to meet 90 percent of its negotiated non-traditional performance measure would be 2012-13. It is highly likely that Congress will already be engaged in the reauthorization process for Perkins V by that time. In effect, this change will likely mean that much confusion and little evaluation will take place when it is most important for Congress to have solid performance data.

Collapsing the non-traditional indicator would create a host of standardization issues. The State Plan Guide does not define how the new performance indicator will be measured. It is unclear whether the collapsed measure – which is simply described as Nontraditional Participation and Completion – will measure enrollment, concentration or completion. If the definition for the new measure varies among states, it will be impossible for OVAE to report to Congress a state by state comparison as required in Perkins IV.

Altering the non-traditional indicator would hinder states' ability to track progress in increasing gender equity within CTE. Collapsing the measures into a single measure could destroy potential for historical data analysis, as states now have seven years of historical data on participation and on completion of nontraditional CTE programs. Using this historical data, states have the capacity to set their baselines and negotiate realistic performance measures for Perkins IV on both nontraditional participation and completion. Creating a new nontraditional measure, while abandoning the two long-standing measures, will cause states to set baselines on a single year's data, thereby setting states up for failure if their baseline year has an uncharacteristically high performance.

Considering all the factors discussed here, the National Organization for Women and NOW Foundation request that the Perkins IV Nontraditional Core Indicator at the secondary and postsecondary levels be maintained as two separate accountability elements as reflected in the State Plan Guide that was released on October 4, 2006.

Sincerely,

Kim A. Gandy
President