



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF CAREER, TECHNICAL, AND ADULT EDUCATION

OFFICE OF THE ASSISTANT SECRETARY

April 10, 2020

Dear State CTE Directors:

First, let me thank you for the extraordinary steps you are taking to meet the needs of your schools and students during this unprecedented 2019 Novel Coronavirus Disease (COVID-19) pandemic. From rotating small groups of students through sanitized labs to moving classes online to manufacturing protective equipment on 3D printers, States and local program practitioners are stopping at nothing to experiment, innovate, and continue preparing students for the career pathways that lie ahead.

Below we provide responses to a second round (Round #2) of critical questions that we have received regarding the impact of the COVID-19 pandemic on the implementation of career and technical education (CTE) programs and services under the Carl D. Perkins Career and Technical Education Act, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). These questions center around local plan requirements, consultation, and performance data submissions. We will issue further rounds of questions and answers when they become available.

In addition, if at any time you have a new and emerging question about Perkins V and COVID-19, please reach out to your State's Perkins Regional Coordinator (PRC) or send an email to our CTE mailbox at [cte@ed.gov](mailto:cte@ed.gov). If you have general questions regarding COVID-19 and how the Department can best support you, please contact [COVID-19@ed.gov](mailto:COVID-19@ed.gov). I encourage you to continue to monitor information regarding COVID-19 from the Centers for Disease Control and Prevention at [www.cdc.gov/coronavirus/](http://www.cdc.gov/coronavirus/) and at our website, [www.ed.gov/coronavirus](http://www.ed.gov/coronavirus).

Thank you for your commitment to the more than 12 million CTE students that we serve!

Sincerely,

/s/

Scott Stump

400 MARYLAND AVE. SW, WASHINGTON, DC 20202  
[www.ed.gov](http://www.ed.gov)

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

1. Will the Department provide flexibilities to States regarding the Perkins V requirements that full local plans, covering FY 2020-23, include the results of a comprehensive local needs assessment (CLNA), as well as locally determined performance levels?

Yes. As described in the March 31, 2020, *Questions and Answers Regarding COVID-19 and Perkins V*, the Department is using the transition authority in section 4 of Perkins V to enable States to extend the duration of a local recipient's One-Year Local Application, covering FY 2019-20, by three months. This extension would enable a local recipient to finalize its full local plan, including completing its CLNA and negotiating locally determined performance levels with the State, if the local recipient chooses to do so. For such a local recipient, the State may issue its FY 2020 Perkins subgrant on schedule to enable the local recipient to continue to seamlessly administer its Perkins V programs and services. See [https://s3.amazonaws.com/PCRN/docs/20-0086.FAQs\\_Perkins.pdf](https://s3.amazonaws.com/PCRN/docs/20-0086.FAQs_Perkins.pdf).

2. Does section 134(d) of Perkins V require a local recipient to conduct *in-person* consultation with a diverse body of stakeholders in order to complete the required comprehensive local needs assessment (CLNA)?

No. While the Department recognizes the value of in-person consultation, given the circumstances regarding COVID-19, we encourage local recipients to consult with stakeholders by electronic, online means, to the extent possible, in order to conduct their CLNAs and develop their local Perkins plans.

3. Is there any flexibility regarding the submission of performance data if schools are closed, students cannot complete the academic year, States cannot obtain data from closed school district offices, or similar problems impact performance data?

For FY 2019-20, States and local recipients are not required to submit performance data on the section 113(b) core indicators. Rather the Secretary used the transition authority in Perkins V to enable States to submit one-year transition plans for FY 2019 and to use FY 2019 to gather baseline data to establish State-determined performance levels as required under Perkins V. For FY 2019-20, States and local recipients are required only to submit narrative information and enrollment data for CTE participants and concentrators. The Department will work with States to address issues in gathering and reporting complete Perkins data in subsequent program years should those issues arise.

In addition, it is important to remind States that section 113(b)(3)(A)(iii) of Perkins V provides that, if unanticipated circumstances arise in a State or changes occur related to improvements in data or measurement approaches, the eligible agency, at the end of a program year, may revise its State-determined levels of performance. Under this section, after public comment, the State shall submit such revised levels of

performance to the Secretary with evidence supporting the revision. The Secretary shall then approve any such revision if that revision meets the requirements of the Act. The same flexibility is available to local recipients under section 113(b)(4)(A)(v) of Perkins V.