

**Carl D. Perkins**  
**Career and Technical Education**  
**Improvement Act of 2006**  
**Legislative Report**  
**August 31, 2010**



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**Submitted by:**

**Office of Commissioner of Higher Education**

**In consultation with the Office of Public Instruction**

**On behalf of Montana Board of Regents of Higher Education**

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**Carl D. Perkins**  
**Career and Technical Education Improvement Act of 2006**  
**Legislative Report**

**Abstract**

This report provides a summary of the Carl D. Perkins legislation reauthorized in 2006 and the steps taken during the years 2008-2010 to advance the vision and goals of the Montana State Plan for Career and Technical Education. The report provides background on Montana's State Plan, changes of direction since the plan was implemented, and a progress report on each of the plan's major goal areas. The entire report is available electronically on the webpage of the Workforce Development Division of the Office of the Commissioner of Higher Education at <http://mus.edu/wd/default.asp>.

# **Carl D. Perkins Career and Technical Education Improvement Act, 2006 State Plan Activities—2008-2010**

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**Submitted By: Office of Commissioner of Higher Education  
on Behalf of the Montana Board of Regents**

Montana statute (§§ 20-7-330, MCA) requires that the Montana Board of Regents prepare a biennial report to the legislature on the results of interactions the regents have had with the superintendent of public instruction, teachers, students, labor organizations, businesses, and institutions or agencies involved in vocational and technical education related to Montana's State Plan for Carl D. Perkins Career and Technical Education Improvement. In Board of Regents Policy 272, the responsibility for those interactions and the subsequent report is delegated to the Office of the Commissioner of Higher Education (OCHE). In collaboration with its Partnering Agency, the Montana Office of Public Instruction (OPI), OCHE is engaged in interactions of this type on a daily basis and has been especially active in discussing State Plan issues in formal meetings of the State Workforce Investment Board, the State Career Technical Education Advisory Council, Montana Association of Career Technical Education, Montana's Two-Year Education Council, the Montana University System Leadership Council, the Montana Board of Public Education, and the Montana Board of Regents of Higher Education. In the course of these ongoing formal and informal interactions, the goals and strategies related to Montana's State Plan have been clarified, adjusted, and improved since its full implementation in 2008.

This report provides a summary of the Carl D. Perkins legislation reauthorized in 2006 and the steps taken during the years 2008-2010 to advance the vision and goals of the Montana State Plan for Career and Technical Education.

## **I. Background**

The reauthorized legislation (Carl D. Perkins Career and Technical Education Improvement Act of 2006) governing federal funding for career and technical education at the secondary and postsecondary level has several priorities:

- Increase opportunities for individuals to keep America competitive
- Develop challenging academic and technical standards and related, challenging integrated academic and career and technical education instruction
- Prepare students for high-skill, high-wage, or high-demand occupations in current or emerging career fields and clusters
- Promote partnerships among education, workforce boards, business and industry, and community organizations
- Provide technical assistance and professional development to teachers/instructors and administrators
- Increase state and local accountability

The Montana Board of Regents of Higher Education is the designated state board to coordinate the development and submission of the state plan for career and technical education as required by the Carl D. Perkins Career and Technical Education Improvement Act of 2006 (Perkins IV).

The state agencies responsible for career and technical education in Montana are the Workforce Development Unit of the Office of the Commissioner of Higher Education (OCHE) and the Division

of Career, Technical, and Adult Education of the Office of Public Instruction (OPI). Given their close coordination of activities, the State Plan and this report refer to the two agencies as the “Partner Agencies.”

Throughout the development of both the transition year plan and the multi-year plan, the **State Plan Advisory Committee**, appointed in conformity with the requirements of Montana Law (MCA 20-7-330), provided guidance and insight from the practitioner perspective. Although statute does not require the continuation of the advisory committee once the state plan has been adopted, the partnering agencies, recognizing the value of continued input from stakeholders, have updated the membership of the State Plan Advisory Committee and incorporated the committee in the Career Technical Education Advisory Council. Members of the State Plan Advisory Committee now include:

- Matt Allen, Industrial Technology Teacher, Jefferson High School (OPI appointee);
- Mark Branger, Executive Director, Montana Association for Career and Technical Education and CTE Teacher/Administrator, Huntley Project School (OPI appointee);
- Kevin Brockbank, Executive Director of Workforce Development and Outreach, UM-Helena (OCHE appointee);
- John Garic, Dean, Montana Tech College of Technology, Butte (OCHE appointee);
- Jasyn Harrington, Training Director, Career Training Institute in Helena (OCHE appointee);
- Vicki Judd, Northwestern Energy, Missoula, member of State Workforce Investment Board (joint OCHE and OPI appointee); and
- Tom Kotynski, Director of Career/Technical Education, Great Falls Public Schools (OPI appointee).

## **II. Changes of Direction Since 2007**

In April 2007, Montana submitted a one-year Transition Plan for the first year of the Perkins Act. The Transition Plan covered Program Year 2007-08 or July 1, 2007, through June 30, 2008. Through the resources made available from the Act, and the state and local funding for career and technical education leveraged through the federal funds, the State committed to update career and technical education services and provide more options for students. To accomplish this goal, several decisions were made during the transition year that governed the direction and content of the multi-year state plan. The major decisions were:

- Establish a State Executive Leadership Team and State CTE Advisory Committee
- Create Big Sky Pathways (BSP)
- Decline to merge Tech Prep Title II into Perkins Title I funding structure
- Transform Tech Prep from a regional service area to a statewide consortium
- Target reserve funds to support local eligible recipient needs

### **A. Changes in Leadership Structure 2008-2010**

In implementing the new Perkins Act, Montana OCHE (the eligible agency) and Montana OPI collaborated on program development and oversight. The partner agencies created a joint leadership structure to provide ongoing review of state activities and progress in improving CTE programs.

The State Executive Leadership Team (SELT), comprised of two administrators from OCHE and two from OPI, makes key decisions regarding the allocations of Title I Perkins funds, including

the “reserve funds” under Section 112 and leadership funds under Section 124. During the reporting period, SELT has also overseen the statewide Title II Tech Prep consortium activities, with input and guidance from agency staff and Tech Prep staff. Despite turnover in SELT positions during the reporting period, SELT has proved to be an effective collaborative leadership structure.

Prior to 1999, OCHE and OPI had separate Perkins Advisory Councils, from which three members were appointed to serve on the State Plan Advisory Team described in 20-2-330 M.C.A. In an effort to coordinate their state-level activities, in 2010, SELT created a single group, the State CTE Advisory Council, with both OPI and OCHE appointees, to bring business and industry representatives together with secondary and postsecondary faculty and administration for the purpose of advising OCHE and OPI administration and staff on state plan activities. For continuity and efficiency, the State Plan Advisory Committee has been among the members of the State CTE Advisory Council. (Membership of both groups is attached as Appendix A.) The Council has met twice and the Advisory Committee has met one additional time during 2010.

### **B. Progress in Big Sky Pathways**

A major focus of Montana’s State Plan and Carl Perkins Programs nationwide is the creation of clear plans of study that integrate rigorous academic courses with relevant curriculum articulated from secondary to postsecondary. The intent is to help students explore career fields during high school, complete high school and, if they choose to do so, make a smooth transition into postsecondary studies in that area of study. In Montana, these programs of study are called Big Sky Pathways.

As emphasized in the State Plan, over time many of the state’s Career and Technical Education (CTE) offerings will be merged into Big Sky Pathways that connect to Montana’s two-year degree providers and also its state university programs. In addition, during implementation of the new Perkins Act, all CTE programs (at the high school and postsecondary levels) will benefit from upgraded curriculum, high-quality technology, and ongoing training to help CTE teachers demonstrate excellence in their knowledge of current industry standards and good teaching practices. Although significant progress has been made in upgraded curriculum, technology, and professional development, statewide progress toward the articulation of programs of study has been slow and is a major focus of the 2010-11 academic year.

### **C. Changes in Tech Prep**

Under the reauthorized Perkins legislation of 2006, Tech Prep was maintained as a separate authorization, with states having the option of merging the Tech Prep funding stream with that of the basic state grant. If a state chose to merge funding streams, then the funds previously allocated to Tech Prep would be governed by all of the requirements of Title I – including distribution by the Title I formula for uses of funds. At that time, the State of Montana did not take the option of merging Title II Tech Prep funding into Title I of the Perkins basic state grant.

During the reporting period, Tech Prep was maintained as a separate title, Title II, and its organization shifted from a regional service area approach to a consortium approach led by Montana State University – Billings College of Technology and Flathead Valley Community College, a consortium funded by a competitively awarded three-year grant. The grant period

expired in June 2010 and the two campuses elected not to continue the consortium. OCHE and OPI will propose merging the Tech Prep funding stream into the basic state grants as of July 1, 2011. Public hearings on the proposal will be conducted in October 2010. During FY2011, Tech Prep funding will be distributed by formula to regional consortia led by two-year colleges with the major emphasis on articulating programs of study (Big Sky Pathways).

#### **D. Changes in the Use of Reserve Funds**

Federal funding for the Perkins Act is a little over \$1.1 billion. As a small state, Montana's allocation of the Perkins Act funds in fiscal 2009 is about \$5.5 million. The state holds five percent of the funds for state administration of the program and 10 percent for coordinated "leadership activities." Of the remaining 85 percent for local programs, up to 10 percent is allocated to local recipients through a "Reserve Fund" for special initiatives and activities. The remainder of local funds is distributed to school districts and two-year colleges, with 65 percent of these funds directed to secondary CTE programs and 35 percent to postsecondary CTE programs. Throughout the reporting period, reserve funds were earmarked for Montana Association of Career and Technical Education (Montana ACTE) for the purpose of providing professional development. Through Montana ACTE, reserve funds were also earmarked for state leadership provided to career and technical student organizations. Upon receiving guidance from the Office of Vocational and Adult Education that these uses of reserve funds was not consistent with federal guidelines, the State Executive Leadership Team has discontinued the practice and instituted methods of funding these initiatives that reflect best practice.

### **III. Progress Report on Multi-Year Carl D. Perkins State Plan**

In 2008, OCHE submitted its' Multi-Year Montana State Plan for Career and Technical Education covering the period of Program Years 2008-09 through 2012-13. The key issues to be addressed throughout the duration of the state plan are as follows:

- Implementing Career and Technical Education Plans of Study
- Re-organizing Tech Prep to Support Big Sky Pathways
- Strengthening Accountability for Results
- Assessing Career and Technical Skills
- Integrating Academic and CTE Skills and Knowledge
- Building a Corps of Effective CTE Teachers
- Ensuring Effective Instruction and Strategies for Special Populations
- Connecting CTE to Employers and Workforce Priorities

This section of the report describes each issue and progress toward addressing it in the reporting period.

#### **A. Career and Technical Education Plans of Study**

As noted earlier, under Perkins IV, states have the responsibility to create and/or recognize a series of CTE offerings called "Programs of Study." These Programs of Study are adopted by local recipients at high schools, regional CTE schools, and community and technical colleges. Each Program of Study is meant to be a cohesive set of academic courses paired with CTE courses, with mechanisms that connect the high school program to postsecondary programs. Ideally, Programs of Study should have closely aligned content that does not duplicate

coursework and allows qualified students to earn college credits while still enrolled in high school. The CTE Program of Study is also designed to culminate with a recognized credential or degree at the community or technical college level, and can also be designed to lead to a baccalaureate degree.

Montana refers to its “Programs of Study” as “*Big Sky Pathways (BSPs)*.” Beginning with the program year 2007-2008, each local education agency (LEA) and postsecondary institution that is a recipient of Perkins funding began planning for implementation of at least one program of study that would result in these outcomes:

- The school districts’ or colleges’ BSPs are to be offered as options to students (and their parents as appropriate) when planning for and completing their future coursework for career and technical content areas. To provide a Big Sky Pathways’ guidance delivery system available to every Montanan, OCHE and OPI partnered with the Montana Department of Labor to enhance the Montana Career Information System (MCIS). In 2009-2010, OCHE dedicated \$50,000 of its Perkins leadership dollars to include the state-level Big Sky Pathways models, the capacity to upload approved individual high school’s Big Sky Pathways, and a means for students to customize and link a four-year high school plan with an actual Montana two-year college program. This electronic planning portfolio has been renamed MAP (Montana Achievement Plan). Because MCIS is free to all Montanans, every student has access at home or at school to develop their own Big Sky Pathway MAP.
- Each Big Sky Pathway will indicate one or more postsecondary level credential, certificate, or degree that is available.
- The BSP can also be customized so it is most relevant to the local job market.
- Each BSP indicates CTE and Academic Courses (and possible electives) available to the student, as well as the courses that are eligible for advanced college credit.
- Other BSPs include coursework that is articulated so it leads directly into a registered apprenticeship program.

During the reporting period, a framework for BSPs has been established through the Montana Career Information System, a major accomplishment. However, although some individual LEAs and postsecondary institutions have established several BSPs, there is much work in this area yet to be done. The development of Big Sky Pathways will be the major emphasis of Montana’s activities in the coming year.

## **B. Reorganization of Tech Prep**

Tech Prep saw several major changes enacted in Perkins 2006 aimed at making the results of Tech Prep more measurable and more closely connecting Tech Prep activities with other CTE activities in the state. First, a specific definition of a Tech Prep student allows for consistent measurement of Tech Prep results. Multiple new performance indicators apply to Tech Prep students, in addition to the general performance indicators that apply to all CTE students. The state’s Tech Prep plan must be closely integrated with the state’s general CTE plan.

If a state chooses to do so, it may merge Tech Prep funding into the general state grant program and therefore be relieved from the programmatic requirements of Tech Prep. The State Executive Leadership Team has concluded that Montana would be well advised to merge these funds beginning FY 2012. With the foundation in professional development achieved by the Peaks to Plains Consortium during the reporting period and the new Career/Technical STATEwide ARTiculation (CT START) process managed by OCHE, next year's activities will develop a sustainable process for developing and implement Big Sky Pathways. Merging the funds after next year gives Local Education Agencies and postsecondary institutions more direct funding to allocate to these Pathways as part of their comprehensive Perkins activities.

### **C. Strengthening Accountability**

The Perkins accountability system holds states and Local Recipients (school districts and community colleges) accountable for the achievement of CTE students in a series of performance indicators. The performance indicators fall into three categories: skill attainment, retention and completion, and transitions. High school programs must measure academic achievement, high school completion and graduation; technical (career-related) skill attainment; and transitions to college, employment, or the military. Postsecondary indicators include technical skill attainment; program retention and completion; and transitions to further postsecondary education, the military, and employment. Programs at both levels are also accountable for "non-traditional" participation, meaning the percentage of young men and women that participate in a CTE program for which their gender is significantly under-represented.

1. *Performance targets and results.* Performance targets are established for each of the indicators at the state level and then also by each Local Recipient based on the state performance target. If the state or local recipient does not meet its performance target for any one of the indicators, it must create a plan of action to improve performance on that indicator. In concert with the state or local improvement plan, the federal or state government must provide technical assistance to help improve performance. Under certain circumstances, if a state or local recipient fails to make necessary improvement against the indicators, the federal and state governments are authorized (but not required) to implement various levels of sanctions. Montana has met or exceeded negotiated levels for secondary and postsecondary indicators for both the 2008-2009 and 2009-2010 grant years.
2. *Identification of secondary CTE Concentrators.* For the Multi-Year State Plan, Montana chose to continue using its "blended" option to define CTE Concentrators at the secondary level. Because of the extreme rural nature and small size of many Montana high schools, it would not be practical to measure only students who took three or more credits of CTE courses in a single program area. By using the "blended" option, which includes any student who takes three or more courses in any CTE program area, more students in small rural settings will be included and the resulting accountability system will have more relevance for local program improvement.
3. *Improvements in data collection.* The postsecondary system of data collection was well-established prior to the adoption of the State Plan. During the 2007-2008 school year, OPI implemented an agency-wide data collection system called Achievement in Montana (AIM). This secure, web-based on-line system is enhancing the collection, reliability, and analysis of data collected. Because the AIM data system does not collect transcript-specific information, OPI relies on each local district to input accurate and reliable data.

The OPI on-line electronic grants management system (E-Grants) is utilized for the Perkins “Intent to Apply,” local applications, amendments, funding requests, and payments. The E-Grant application is consistently helpful in communicating and collecting valuable data in an efficient manner. It helps to monitor the proper usage of funds and provide technical assistance to those local districts with questions about Perkins monies.

Currently OPI is in year two of a four-year Statewide Longitudinal Data System project funded by the U.S. Department of Education. The establishment of a data warehouse and the accomplishment of related objectives will lay the foundation for a longitudinal data system with long-lasting benefits for public education in Montana. Such a system as this makes it possible to use growth models both for school accountability and for improving instruction. It will facilitate federal and state reporting and it will allow more individualized tracking, instruction, and intervention with students by teachers and administrators.

4. *Negotiated performance levels and improvement plans.* When the Partner Agencies have reached agreement with the U.S. Department of Education about the adjusted level of performance for each of the secondary and postsecondary indicators, each Partner Agency notifies school districts or two-year colleges of the established level and offers the opportunity for negotiation over one or more of the adjusted levels of performance. As the new performance indicator data is gathered and reported, districts and colleges are accountable for performance on the indicators. If they fall short of their performance targets, OCHE and OPI will work closely with them to offer technical assistance and implement improvement plans to improve performance on a program-by-program basis. Montana postsecondary is unique nationally in that indicator performance levels have been negotiated locally since 1999. The requirement for local negotiations was added to the 2006 legislation. OPI built into the electronic grant application (E-Grant) a place for any eligible Local Education Agency (LEA) who fails to meet at least 90 percent of their agreed upon local adjusted level of performance for any of the core indicators to complete an improvement plan. Approval of the current Perkins application will be suspended until the improvement plan is on file and has been reviewed and accepted by the appropriate CTE State Specialist staff. The highest priority will be given to the indicator furthest from the state negotiated goal. If activity changes require budget amendments, a budget revision/amendment will be submitted and flagged as an Improvement Plan revision.

As stated above, Montana has met or exceeded negotiated levels for secondary and postsecondary indicators for both the 2008-2009 and 2009-2010 grant years. While improvement plans were not required because indicator goals were met, local postsecondary grantees must focus on specific programs that do not meet the local institution goal. In addition, Montana postsecondary colleges began receiving state indicator reports organized by indicator and program. These allowed local colleges to see how they compared to other colleges in the state. For the first time, local colleges also received program reports cards so each program within an institution can see how they compare with other programs. This, in addition to comparing themselves with like programs across the state, gives programs a number of opportunities to identify red-flag issues that would benefit from further analysis or attention.

#### **D. Assessing Career and Technical Skills**

Perkins law (Section 113(b)(A)(ii)) requires each state to develop an indicator relating to “student attainment of career and technical skill proficiencies, including student achievement on technical assessments that are aligned with industry-recognized standards, if available and appropriate.” This provision requires a more consistent approach to measuring technical skill attainment, using assessment instruments that are valid, reliable, and based upon industry-recognized standards, where they are available. States are not required to use industry-based credentials for every program, nor are they required to use exactly the same measurement approach for all their programs. Whatever assessments approaches are used, however, should be based on standards (when such standards are available) and must meet criteria for validity and reliability. In short, assessment approaches must accurately and consistently measure the attainment of technical skills across programs in the state or against a nationally developed assessment.

Both OCHE and OPI believe that, when fully developed, an upgraded technical skills assessment system will allow greater comparability and accountability for program improvement. To implement this new requirement for technical skills assessment, OPI conducted a survey of its CTE programs to determine what assessments are currently in place.

OPI also collected and reported Technical Skill Assessment scores for the Agriculture, Health Sciences, and Industrial Technology program concentrators for who we could locate scores. The Agriculture assessment was based on industry standards and national standards adopted by the National FFA Organization. The Health Sciences assessment was conducted by the National Consortium for Health Science Education, and the Industrial Technology assessments were based on industry standards adopted by the National SkillsUSA Association. Additional Technical Skill Assessments, as available and appropriate, will be reported as follows: Family & Consumer Sciences Education—end of school year 2010-2011; Business Education—end of school year 2011-2012; Communication Arts—end of school year 2011-2012.

OCHE reviewed the current use of vendor-based assessments and Industry-Based Certifications. The results of the current technical skills assessments utilized were put together in a report that shows by program which Perkins-funded schools offer the program and which refer to an approved assessment vendor, designated below with the word \*GOLD\*. The second report below identifies the types of approved assessments to which schools are referring students. Schools that are not referring students can then contact the assessment agency or other program staff to establish referral and information sharing practices.

CIP & CIP Title:	BCC	DCC	FPCC	FVCC	MCC	MSUB	MSUGF	MSUN	MTCOT	SKC	UMH	UMM
111002 - System, Networking, and LAN/WAN												*GOLD*
111004 - Web/Multimedia Management and Webmaster (NEW)		prog							prog		*GOLD*	
111099 - Computer/Information Technology Services Administration												*GOLD*
119999 - Computer and Information Sciences & Support Services,	prog											
120503 - Culinary Arts/Chef Training				*GOLD*								*GOLD*
120504 - Restaurant, Culinary, and Catering Management/Manager												prog
131210 - Early Childhood Education and Teaching (NEW)	prog		*GOLD*			prog				prog		
131501 - Teacher Assistant/Aide			prog		prog					prog		
140101 - Engineering, General		prog										

(Technical Skill Assessment Report 1 – TSA by Perkins Grantee)

College	Program ID and Title	TSA	Assessment Notes
<b>470605 - Diesel Mechanics Technology/Technician</b>			
MSUB	074 - Diesel Technology	Gold	ASE (Automotive Service Excellence) Exam.
MSUB	075 - Diesel Technology	Gold	ASE (Automotive Service Excellence) Exam.
MSUN	A10 - Diesel Technology		
UMM	AAS-DIES- - Diesel Equipment Technology		
UMH	AASDT - Diesel Technology		
UMM	POWR-AAS - Diesel Equipment Technology, Power Generation		

(Technical Skill Assessment Report 2 – TSA vendors)

The highest priority will be to assure programs not referring students to an approved assessment do refer, where one or more colleges offer one. The next priority will focus on development and implementation of assessments for programs where none are available through national or state assessment or certification organization.

### E. Integration of Academic and CTE Knowledge and Skills

The Perkins Act of 2006 emphasizes the importance of integration of academic and career technical education. One of the key purposes of the Perkins Act is to promote the development of services and activities that “integrate rigorous and challenging academic and career and technical instruction.” As they create plans for their Perkins funds, local schools are required to demonstrate how they will “improve the academic and technical skills of students...through the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education programs...”

During implementation of the 2008-2012 plan, OPI is undertaking the revision of the *Montana Standards and Guidelines for Career and Technical Education*. These are the standards by which CTE programs are evaluated and approved at the secondary level. Accreditation standards in technology, workplace competencies, and career and technical are being used as the basis for aligning curriculum. A review of the program standards and guidelines for each content area was conducted in conjunction with OPI Specialists and CTE professionals during the reporting period. National content standards have been adopted in all CTE program content areas. Updated program standards will be released for each content area during the next reporting period.

As part of the Standards and Guidelines review, OPI has completed a curriculum crosswalk process in Agriculture Education and Health Science Education. Academic integration is an integral part of each CTE program, and OPI will draw upon other national resources and models to provide sample instructional resources to ensure academic integration in the CTE classroom and Big Sky Pathways. Related processes to support academic/CTE integration also include:

- Strengthening the focus of Academic/CTE Integration during monitoring visits to local education agencies
- Working with local education agencies to develop improvement plans to meet performance targets for academic skills indicators.

#### **F. Building a Corps of Effective CTE Teachers**

The Perkins Act calls on states to offer “comprehensive professional development for career and technical teachers, faculty, administrators, and career guidance and academic counselors.” The new law says that State Leadership Funds must be used for professional development programs that are “high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher’s performance in the classroom and are not 1-day or short-term workshops or conferences.” Another element of the state plan (Sec. 122 (c)(3)) indicates the state must have a plan for improving “the recruitment and retention of career and technical education teachers, faculty, and career guidance and academic counselors,” as well as for improving “the transition to teaching from business and industry.”

During the reporting period, Montana has responded with professional development that is “high-quality, sustained, intensive, and classroom-focused,” as stated in Section 124 of the Perkins Act. OPI has developed a new professional growth model known as the Extended Learning Experience (ELE). The ELE strengthens and deepens teacher knowledge through a weeklong, summertime professional development experience. The Peaks to Plains Consortium has been extremely active during the reporting period in providing NCCER training and certification opportunities for career and technical education faculty throughout the state.

The OPI Specialists have continued the process of engaging secondary teachers, both academic and career and technical, to update program-area-specific standards and guidelines to enhance curricula. Workshops were provided for CTE and academic teachers on interdisciplinary lessons at the Big Sky Pathways Institute in 2009. Career cluster-specific teams have been implemented in each of the six career fields to assist districts in the creation and implementation of career clusters and to better align Montana standards to career clusters and industry standards. Four webinars during the 2009-2010 school year focused on “Enhancing CTE Teaching” and made available on the CTE web page for teachers in all areas—CTE and non-CTE alike. Topics included SmartBoards, Google Tools, and Podcasts, Blogs and Wikis, and Brain-Based Research.

In August 2010, OPI’s Family and Consumer Sciences (FCS) Education Specialist offered regional workshops in nine locations around the state over a two-week period of time. During the workshops, Family and Consumer Sciences professionals received professional development on CTE topics including Carl Perkins and Big Sky Pathways, Academic Infusion, Technical Skill Assessments, Middle School to High School Transitions, Best Practices, and Leadership Development for the Classroom. The workshops were well received and reached approximately 110 educators. The information presented will be sustained and revisited during a series of

Webinars offered over the course of the 2010-2011 school year and will be hosted by the FCS Education Specialist from the OPI.

During the 2009 Montana State Legislative session a bill was passed to provide almost \$250,000 for the biennium for Agriculture Education Programs. HB 464, entitled “Advancing Ag Education,” provided funding for Agriculture teachers completing training in and developing improvement plans based on program assessments on National Quality Program Standards, which the state adopted as state program standards for Agriculture. Almost all Agriculture instructors participated in the program. The assessment provided instructors and the school a program of improvement for the Agriculture program. Funds were directed to areas shown to be in highest need for improvement on the assessment.

A “New Health Science Teacher Training Course” (July 2009/June 2010) trained 27 additional teachers. Professional Development in teaching strategies for Human Anatomy included both secondary and postsecondary health science faculty.

Postsecondary professional development has primarily been delivered through local applications and was related to specific programmatic topics, or general topics such as retention, completion or curriculum development. Training related to Big Sky Pathway development was also supplemented by the postsecondary local applications.

### **G. Ensuring Effective Strategies for Special Populations**

The Perkins Act of 2006 identifies the following students as “special populations”:

- individuals with disabilities
- individuals from economically disadvantaged families, including foster children
- individuals preparing for non-traditional fields (*for their gender*)
- single parents, including single pregnant women
- displaced homemaker
- individuals with limited English proficiency

In its plan, each state must describe the program strategies for special populations, including a description of how it will ensure that students receive access to CTE activities, will not be discriminated against, and will be provided with programs that are designed to help meet or exceed the State and local performance targets on the performance indicators.

During the reporting period, Montana has used local application data to identify programs that did not meet their local negotiated levels of performance for the nontrad indicators. These grantees were given additional funds in 2008-09 through state leadership to develop counseling or other strategies to increase nontrade participation and completion. In May 2009, OPI and OCHE also collaborated for a two-year RFP to secondary and post secondary to support and improve career and technical education to students from special populations that lead to occupations that are high-demand, high-wage, or high-skill. In each application submitted by a school district, a postsecondary institution, or jointly between two or more such entities, a partnership was required. Applicants scored higher if they could demonstrate that one or more Montana-based non-profit organizations was given the opportunity to play a significant role in the project. Five grants were awarded for a total of \$193,308 for the first year. After a review of the performance for year one, all grants have been funded for the second year.

Postsecondary local application grants have included each special population group in the indicator reports by both program and institution. Grantees are required to address major deficits in performance for special population groups within each program. Data can also be analyzed at the state level to determine if program deficits are consistent across the state and across institution type, for example colleges of technology vs. tribal colleges. The 2008-2009 analysis, provided to the CTE Advisory Council, identified special population groups as a whole rank higher than the general CTE student population for all indicators.

## **H. Connecting CTE to Employers and Workforce Priorities**

A newly stated purpose of the Perkins Act is “providing individuals with opportunities throughout their lifetimes to develop, in conjunction with other education and training programs, the knowledge and skills needed to keep the United States competitive.” In establishing this purpose, Congress drew a careful balance, helping individuals grow and advance in their areas of interest and aptitudes, but also making sure that available programs are focused on those that help keep the United States competitive. Also, throughout the Act, there are multiple references to preparing students for jobs that are “high skill, high-wage, or high-demand” in “current or emerging occupational areas.” While there is no federal definition for the terms “high-skill, high-wage, or high-demand,” Montana, in coordination with the Montana Department of Labor and Industry, has developed a methodology defining the criteria, which apply to every CTE program that is supported by Perkins funding:

### **“High Skill Occupation”:**

- The occupation requires completion of an associate degree, postsecondary career technical education, more than 12 months of on-the-job training, or a combination of work and formal training; or,
- At least half of the 10 basic O\*NET skills for this occupation are ranked at or above 50% in importance and at least 5 of the other O\*NET skills required for this occupation are at or above 50% in importance.”

### **“High Demand Occupation”:**

- *The occupation* has a greater than average projected annual job growth rate for Montana (1.6% using 2004-2014 projections); **or**
- The occupation has at least 50 annual average job openings *in Montana.*”

### **“High Wage Criteria”:**

- *The occupation* has an average annual wage which is greater than the wage at the 75<sup>th</sup> percentile (\$39,615 in 2006) for occupations in the state of Montana.”

In the program approval and review process, OPI has asked each eligible recipient to explain how each program area relates to current or emerging occupational opportunities using the “high-skill, high-wage, or high-demand” criteria. If local conditions for employment warrant a determination that a targeted occupation does not meet the state criteria, but is appropriate for the local area, the local recipient may appeal to the State Executive Leadership Team to resolve the issue. Montana has also required eligible recipients to indicate how business and industry is giving input into the CTE curriculum. Programs that do not have affiliations with business and industry are required to establish and maintain a business and industry affiliation in order to be eligible for funding.

Two pathways meet all three criteria--Health Science and Construction--high-skill, high-demand and high-wage. The biggest challenge for health science educational programs is finding qualified clinical education sites and faculty to provide clinical education. In January 2010, postsecondary leadership funds were awarded to MSU-Great Falls to increase clinical placements within the Health Science pathway by purchasing StudentMax software and hiring a placement coordinator. To further align instruction with industry needs, over a hundred secondary and postsecondary construction instructors

in Montana were certified by the National Center for Construction Education and Research (NCCER) in 2010. This effort was funded by Peaks to Plains through three-day training sessions in multiple locations.

OCHE has partnered with the Occupational Supply and Demand System (OSDS) to use state specific wage data to link Montana criteria to occupations and Classification of Instructional Program (CIP) Codes. [Click on this link](#) to view the website and Montana tables. Montana is the only state currently utilizing this feature to meet the requirements of the law, but others may soon also participate as the OVAE reviews how to strengthen this requirement. Currently, postsecondary programs must meet one of the criteria. Future requirements may require programs to meet at least two in order to be funded. To further integrate business and industry, programs are required to establish and maintain through program advisory councils. Advice given is incorporated into the grant planning and prioritization process to assure business and industry input is considered along with other decision-making data and information.

#### **IV. Financial Requirements**

Funds received through the allotment made under Section 111 are allocated between secondary and postsecondary Career and Technical Education as follows:

##### **A. Sections 131 and 132**

Eighty-five percent (85%) of the funds are allocated under Section 131 and Section 132. Up to ten percent (10%) of the eighty-five percent (8.5%) are used in accordance with Section 112 (c)(Reserve). Taking into account the Reserve Funds, the remainder of local funding is allocated as follows: Sixty-five percent (65%) to secondary career and technical education and thirty-five percent (35%) will to postsecondary career and technical education.

This distribution of funds was the result of consultation between OCHE and OPI, reflecting upon input given the State Plan Advisory Committee established under Montana Law (MCA 20-7-330) in 2006. In the judgment of the Partner Agencies, this distribution provided an equitable and reasonable allocation of scarce resources to provide quality CTE services. The distribution was built upon a tradition of previous practice in Montana and continues to reflect the policy direction of more closely aligning and connecting secondary and postsecondary CTE within Montana.

##### **B. Reserve [Section 112]**

Montana has retained a 10-percent Reserve fund as allowed by the Perkins legislation, which was \$455,910.00 for fiscal year 2009-2010. (In order to reflect Perkins legislation more accurately, the State Plan was amended in July 2010 to provide the latitude of “up to 10 percent.”) It is the role of the State Executive Leadership Team (SELT) to ensure coordination of Perkins activities across educational and workforce systems and to set priorities for activities that have a statewide impact and promote innovation in CTE programs and services. To do this, SELT, in consultation with the State CTE Advisory Committee, determines priorities for allocation of the Reserve funds. The final decision is the responsibility of SELT as the fiscal and programmatic administrators of the Perkins grant.

The options available for consideration meet the required and permissive uses listed in Section 135 of the Perkins legislation. The priorities may include, but are not limited to: Professional development, career and technical student organizations, skill assessments at the secondary and postsecondary level, curriculum and product development, integration of academic and career

and technical knowledge and skills, use of technology, support for programs of study, and services for special populations. As noted in an earlier section of this report, Montana has recently altered its practices with regard to professional development and student organizations to align more consistently with federal guidelines and best practice.

### **C. Role of Montana-Based Non-Profit Organizations**

In 2007, OCHE and OPI agreed to a Memorandum of Understanding by which \$360,000 was designated out of FY 2007 Reserve Funds to provide services, in accordance with the programmatic purposes of the Act, for activities to be carried out during the biennium through eligible institutions directed to Montana-based non-profit organizations, with a focus on community-based organizations that have established ties at the community level. Five two-year awards were subsequently made to partnerships between eligible institutions and schools working with Montana-based non-profit organizations.

In the summer of 2008, each recipient of the specially designated Reserve Funds submitted an interim report. The State CTE Executive Leadership Team determined that sufficient progress has been made to continue the second year of funding for each of the recipients. Each recipient submitted a final report on the project in late summer of 2009.

As noted earlier, in May 2009, OPI and OCHE collaborated for a two-year RFP to secondary and postsecondary to support and improve career and technical education to students from special populations that lead to occupations that are high-demand, high-wage, or high-skill. In each application submitted by a school district, a postsecondary institution, or jointly between two or more such entities, a partnership was required. Applicants scored higher if they could demonstrate that one or more Montana-based non-profit organizations was given the opportunity to play a significant role in the project. Five grants were awarded for a total of \$193,308 for the first year. After a review of the performance for year one, all grants have been funded for the second year.

### **D. State Leadership [Section 124]**

**Individuals in Institutions.** As described in Section 112(a)(2)(A) of the Act, up to 1 percent of the State's entire allocation may be set aside from State Leadership Funds to support CTE services in state institutions. Montana had committed to make 0.5 percent of the State's Perkins state leadership allocation available to an agency, organization or institution serving individuals in state institutions, which was \$26,818.00 for fiscal year 2009-2010. Funds have been awarded through a competitive grant or contract process, although there has been little competition for these funds. In changes to the State Plan adopted by the Board of Regents in July 2010, the ceiling on these funds was expanded to 1%, with the latitude to award less provided through the language "up to 1%," just as it is stated in the Act. In addition, the adopted changes clarify that state institutions other than correctional institutions also qualify for these funds. During the 2010-2011 grant year, Montana will conduct a survey and site visit of each qualified institution. The purpose will be to determine to potential collaboration between institutions and primarily postsecondary certificate and associate of applied science degree programs.

**Nontraditional Training and Employment.** The amount to be made available under Section 112 (a)(2)(B) to support nontraditional training and employment services is \$60,000. One recently-funded project to MSU/AHEC included promoting STEM careers to female high school students. A video was created that highlights six Montana women pursuing careers in non-

traditional fields. DVDs were distributed to all Montana high schools and the DVD is available on the OPI website and the Montana Career Information System. Articles were written for inclusion in Montana School Counselor Association newsletters. An exhibit table with non-traditional information was set up during the Montana School Counselor Association Conference this spring.

Another project funded for two years is *Montana Prospects: Educational and Career Opportunities in STEM for Girls (MPECO-STEM-G)*. This award to the University of Montana is a state academic learning project to be developed collaboratively by school and university partnerships. The project and its activities focus on how to attract, engage, and retain girls in science, technology, engineering, and mathematics (STEM) disciplines. There are three overarching goals of the project: (1) Develop a 9-20 Community of Practice to build partnerships between state university systems and public school districts; (2) Engage in student assessment for math readiness and computational fluency through Math Curriculum Based Measurement assessment for 100 tenth-grade girls; and (3) Create and facilitate a two day STEM summer camp for 12 ninth-grade girls.

**Remainder of State Leadership Funds.** After accounting for leadership funds expended for individuals in institutions and non-traditional services, the remaining state leadership funds are allocated as follows: Fifty percent for secondary (OPI) and fifty percent for postsecondary (OCHE). In fiscal year 2009-2010 each agency received \$224,773.00, these funds were used for the six remaining required uses of Section 124 and appropriate permissible uses.

#### **E. State Administration [Section 121]**

The amount to be expended for state administration under Section 112 (a)(3) is five (5.0) percent of the total grant, and a state match is required. These funds are allocated as follows: Sixty-eight percent for secondary (OPI) and thirty-two percent for postsecondary (OCHE).

As mandated by Maintenance of Effort requirements, a consistent or equal amount of state of Montana General Fund dollars has been expended for state administration under Section 112(a)(3).

- 1. Allocations for Secondary CTE Programs.** OPI has distributed funds on an annual basis for secondary CTE programs to LEAs according to the following formula, as determined in the Perkins Act:
  - a. The total amount allocated for distribution through the local application formula for secondary education CTE (other than Reserve Funds) is \$2,667,075.00 for the July 1, 2009 through June 30, 2010 grant cycle.
  - b. Of this amount, seventy percent of the available funds were allocated to LEAs based on the census data for school system enrollment for the number of children in poverty aged 5-17 for the previous school year.
  - c. Thirty percent of the available funds were allocated to LEAs based on the AIM enrollment data for the number of children aged 5-17 for the previous school year.
- 2. Allocations for Postsecondary CTE Programs.** The total amount allocated for distribution through the local application formula for postsecondary education CTE (other than Reserve Funds as noted in Section 6.1) for the most recent year (FY 2010) was \$1,436,117.00. Funding for postsecondary programs is determined by dividing the number of Pell grant and Bureau of Indian Affairs program recipients enrolled in the two-year postsecondary

institution by the total number of Pell Grant and Bureau of Indian Affairs program recipients in the state. Each two-year postsecondary institution must qualify for at least \$50,000 before a grant is awarded.

## **V. Amendments to the State Plan**

As noted at several points in this document, minor amendments to the state plan were approved by the Montana Board of Regents in July 2010. A cover memo explaining the changes and providing rationale for each is attached to this report as Appendix B.

## **VI. Conclusion**

The introduction of the Montana Perkins Multi-Year State Plan places the value of its work within the context of the Montana Board of Regents' strategic plan for 2006-2010. The Regents' plan points out the changing skill needs for economic success in the 21st century.

*“What has changed (over the 100 years since Montana gained statehood) is the minimum level of education necessary to successfully participate in our society and economy. Postsecondary education has long been a gateway to success for our best and brightest and more privileged citizens. Now it is essentially a requirement for almost everyone. Many years ago, an eighth grade education was recognized as sufficient for most citizens. This gave way to a standard that a high school diploma was necessary for entrance to the middle-class and the chance to have a comfortable life. In the 21st Century, the hurdle has plainly moved to where at least some postsecondary education is now necessary for even modest prosperity in any high-wage, industrialized economy.”*

As the June 2010 Carnevale, et al., report, “Help Wanted: Projections of Jobs and Education Requirements Through 2018,” documents, these words are even truer today. Recognizing this reality, the State of Montana continues to engage in activities made possible by the Carl D. Perkins Career and Technical Education Improvement Act of 2006. Through the resources made available from this Act and the state and local funding for career and technical education that is leveraged through the federal funds, the State is moving forward to update career and technical education services and provide more options for students wishing to pursue postsecondary studies. The complete State Plan, as amended, can be accessed at the OCHE Workforce Development website: <http://mus.edu/wd/>.

# Appendix A



# Montana Career and Technical Education Advisory Council

TERM EXPIRES	NAME	POSITION	CONTACT INFORMATION
July 1, 2011	Allen, Matt	Industrial Tech Instructor Jefferson Co. High School  OPI Appointment	PO Box 838 Boulder, MT 59632 <a href="mailto:matt.allen@jhs.k12.mt.us">matt.allen@jhs.k12.mt.us</a> Phone: 406-225-3317 ext 122
July 1, 2012	McDonald, Tracie	Counselor Salish-Kootenai College  OCHE Appointment	PO Box 70 Pablo, MT 59855 <a href="mailto:Tracie_mcdonald@skc.edu">Tracie_mcdonald@skc.edu</a> Phone: 406-275-4823
July 1, 2013	Branger, Mark	Executive Director, Montana ACTE  <i>State Plan Advisory Team</i>  OPI Appointment	Huntley-Project School District 1477 Ash Street Worden, MT 59088 <a href="mailto:mbranger@huntley.k12.mt.us">mbranger@huntley.k12.mt.us</a> Phone: 406-967-2540 ext 306
July 1, 2013	Brockbank, Kevin	Executive Director of Academic & Workforce Dev. UM-Helena College of Technology <i>State Plan Advisory Team</i> OCHE Appointment	1115 North Roberts Street Helena, MT 59601 <a href="mailto:brockbankk@umhelena.edu">brockbankk@umhelena.edu</a> Phone: 406-444-6775
July 1, 2011	Chapman, Kelly	Vice President of Foundation Activities Student Assistance Foundation  Joint Appointment	2500 Broadway PO Box 203101 Helena, MT 59620-3101 <a href="mailto:Kchapman@safmt.org">Kchapman@safmt.org</a> Phone: 406-495-7390
July 1, 2013	Curry, Tom	Representative to SWIB International Brotherhood of Electrical Workers (IBEW Local #532) Joint Appointment	1238 Yale Billings, MT 59102 <a href="mailto:tomcurry@bresnan.net">tomcurry@bresnan.net</a> Phone: 406-861-4526
July 1, 2014	Gallagher, Tom	Computer Technology Department Chair UM-Missoula College of Technology  OCHE Appointment	909 South Avenue West Missoula, MT 59801 <a href="mailto:Thomas.gallagher@umontana.edu">Thomas.gallagher@umontana.edu</a> Phone: 406-243-7814
July 1, 2011	Garic, John	Dean Montana Tech College of Technology <i>State Plan Advisory Team</i> OCHE Appointment	25 Basin Creek Road Butte, MT 59701 <a href="mailto:jgaric@mtech.edu">jgaric@mtech.edu</a> Phone: 406-496-3714
July 1, 2012	Harrington, Jasyn	Assistant Director Career Training Institute <i>State Plan Advisory Team</i> OCHE Appointment	347 N. Last Chance Gulch Helena, MT 59620 <a href="mailto:jasynh@ctibrc.org">jasynh@ctibrc.org</a> Phone: 406-443-0800
July 1, 2012	Hunts, Holly	Professor, Health and Human Development Montana State University  OPI Appointment	PO Box 173540 Bozeman, MT 59717-3540 <a href="mailto:hhunts@montana.edu">hhunts@montana.edu</a> Phone: 406-994-7993
July 1, 2011	Judd, Vicki	Representative to SWIB Community Relations Manager Northwestern Energy <i>State Plan Advisory Team</i> Joint Appointment	1801 S. Russell St. Missoula, MT 59806 <a href="mailto:Vicki.judd@northwestern.com">Vicki.judd@northwestern.com</a> Phone: 406-542-5932
July 1, 2012	Kotynski, Tom	Workforce Development Facilitator Great Falls School District <i>State Plan Advisory Team</i> OPI Appointment	1900 2 <sup>nd</sup> Ave South Great Falls, MT 59405 <a href="mailto:Tom_kotynski@gfps.k12.mt.us">Tom_kotynski@gfps.k12.mt.us</a> Phone: 406-268-6024
July 1, 2014	Moore, Brad	Superintendent, Richey Public Schools  OPI Appointment	PO Box 60 Richey, MT 59259 <a href="mailto:bmoore@richey.k12.mt.us">bmoore@richey.k12.mt.us</a> Phone: 406-773-5523 x 102
July 1, 2014	Nelson, Jane	Outreach Coordinator Eastern Montana Area Health Education Center RiverStone Health OCHE Appointment	123 S. 27 <sup>th</sup> Street Billings, MT Phone: 406-247-3277 <a href="mailto:Jane.nel@riverstonehealth.org">Jane.nel@riverstonehealth.org</a>
July 1, 2013	Stevenson, Marolane	President-Elect Montana School Counselor's Association  OPI Appointment	Big Sky High School 3100 South Avenue West Missoula, MT 59804 <a href="mailto:mstevenson@mcps.k12.mt.us">mstevenson@mcps.k12.mt.us</a> Phone: 406-728-2400 ext 8033

<b>STATE AGENCIES</b>		
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<b>OFFICE OF THE COMMISSIONER OF HIGHER EDUCATION</b>		
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<b>Moe, Mary Sheehy</b>	<b>Deputy Commissioner of Two-Year Education Office of the Commissioner of Higher Education</b>	2500 Broadway, PO Box 203201 Helena, MT 59620-2501 <a href="mailto:mmoe@montana.edu">mmoe@montana.edu</a> Phone: 406-444-0316
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<b>OFFICE OF PUBLIC INSTRUCTION</b>		
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<b>Eyer, T. J.</b>	<b>Division Director Career, Technical and Adult Education Office of Public Instruction</b>	PO Box 202501 Helena, MT 59620-2501 <a href="mailto:TEyer@mt.gov">TEyer@mt.gov</a> Phone: 406-444-7915
Fiedler, Diana	Perkins Accountability Specialist	PO Box 202501 Helena, MT 59620-2501 <a href="mailto:dfiedler@mt.gov">dfiedler@mt.gov</a> Phone: 406-444-9019
Harris, Renee	Health Occupations Education Specialist	PO Box 202501 Helena, MT 59620-2501 <a href="mailto:rharris3@mt.gov">rharris3@mt.gov</a> Phone: 406-444-2059
King, Brad	Agriculture Education Specialist	PO Box 202501 Helena, MT 59620-2501 <a href="mailto:bking2@mt.gov">bking2@mt.gov</a> Phone: 406-444-4451
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Swenson, Eric	Business & Marketing Education Specialist	PO Box 202501 Helena, MT 59620-2501 <a href="mailto:eswenson@mt.gov">eswenson@mt.gov</a> Phone: 406-444-7991
<b>York, Steve</b>	<b>Assistant Superintendent Office of Public Instruction</b>	PO Box 202501 Helena, MT 59620-2501 <a href="mailto:SYork@mt.gov">SYork@mt.gov</a> Phone: 406-444-4434

# Appendix B



**ITEM 148-101-R0710**

**Proposed Changes in Perkins IV State Plan**

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**THAT**

Pursuant to 20-7-330, M.C.A., and BOR Policy 272, the Board of Regents approve revisions of the Carl D. Perkins IV State Plan recommended by the State Executive Leadership Team and approved by the Office of Vocational and Adult Education (OVAE).

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**EXPLANATION**

Montana statute and regental policy require that revisions of the Perkins IV State Plan be approved by the Board of Regents. In preparation for the monitoring visit by the Office of Vocational and Adult Education in June 2010 and in response to the dissolving of the Big Sky Pathways Peaks-to-Plains Consortium as of June 30, 2010, the State Executive Leadership Team (SELT) for Montana's Carl D. Perkins Program has undertaken an extensive review of the State Plan for Perkins IV and recommends several changes.

The attachment to this agenda item provides the specific revisions to the pertinent sections of the state plan. An explanation of each basic change is provided below:

1. **Delivering Tech Prep (Title II) through formula-based funding for twelve consortia, rather than competitively awarded funding for 1 consortium.** (Specific revisions are on pp. 7, 55, 57, 58, 59, 60, and 61, attached). The grant period for the Peaks-to-Plains Big Sky Pathways Consortium led by Flathead Valley Community College and MSU-Billings College of Technology expired June 30, 2010, and the two campuses elected not to extend the grant beyond the initial period. After considering our options, SELT has decided to pursue incorporating Tech Prep funds into the larger Perkins allocation as of July 1, 2011, and will begin the formal hearing process required for that substantive revision in October 2010. In the interim, we propose using a formula-based process for allocating Tech Prep funding in FY 2011. We plan to create up to twelve consortia, designating the Perkins-eligible two-year colleges as "hubs" for the development of secondary-through-postsecondary programs of study in career/technical areas. Twelve colleges have already expressed interest in leading a consortium in their region; up to 168 high schools are anticipated to participate. In addition to advancing the development of programs of study, a Perkins priority, this activity will support the COLLEGE!NOW approaches to dual enrollment and regional responsiveness.
2. **Broadening the institutions eligible for "State Institutions" Perkins funding to include institutions that serve people with disabilities.** (Specific revisions are on pp. 4, 37, and 63.) Language throughout the document has been changed from "Correctional Institutions" to a broader designation that includes institutions like the Montana School for the Deaf and Blind, which serve individuals with disabilities. Perkins law requires that these institutions include residential services, directly receive state and/or federal funding and offer career and technical training programming in coordination with a Perkins-eligible high school or two-year college.
3. **Changing fixed percentages for allocations in two areas to a ceiling for allocations and increasing the ceiling in one area.** (Specific revisions are on pp. 37 and 63.) In the current plan, a fixed 0.5% of leadership funding is earmarked for projects at state correctional institutions and a fixed 10% of the local application grant funds is reserved for projects prioritized by the State Executive Leadership Team. The federal guidelines identify such percentages as "ceilings" for funding rather than fixed

amounts by using the expression “up to 1%” and “up to 10%.” In order to mirror the federal language and provide greater flexibility in the crafting of proposals for these funds and decisions about awards, SELT proposes using similar language in Montana’s State Plan. We also propose increasing the 0.5% ceiling for state correctional institutions to 1% to match the requirements of the Perkins Law. (See #2, above.)

4. **Reducing the number of on-site reviews of local applications from 25% of all local applications to 20%** (p. 44). This change mirrors federal practice. The Carl D. Perkins Law does not specify that sub-grantees be monitored in any specific percentage or timeframe. However, OVAE itself is required to monitor all state grants at least once during the five years of the Perkins Law. On an annual basis, this amounts to 20%.

The Office of Adult and Vocational Education has advised the Office of the Commissioner of Higher Education that these revisions are not substantive enough to necessitate a public hearing process.

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## **ATTACHMENTS**

Specific Proposed Revisions to Montana’s Perkins IV State Plan