

# Strengthening CTE for the 21st Century

## Perkins V

New Mexico Public Education Department

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State of New Mexico  
*Governor*

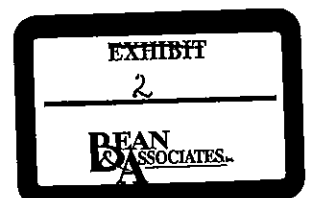


**4-YEAR PLAN**

**Grant Years 2020-2024**

**REVISED JUNE 25, 2020**

This plan brings resources to secondary and postsecondary learners so they can access the equipment, training, and skills that New Mexico's next generation needs in order to be ready for tomorrow's jobs and the technologies of the future.



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## EXECUTIVE SUMMARY

In this document, New Mexico lays out a plan for administering Career Technical Education (CTE). This structure was outlined in the Perkins V transition plan dated 2019. It has been refined during the autumn and winter of 2019. The 2019-2020 school year also brought new CTE funding to New Mexico in the form of the Next Gen CTE state pilot program. During the pilot/transition year, industry representatives and local educational agencies collaborated to identify their local needs and how best to address them with secondary and postsecondary education. During this same period, state agencies have begun to collaborate closely to establish high priorities for CTE funding, including the Department of Workforce Solutions, Economic Development, Higher Education, and the Department of Health. Local secondary agencies that have not been participants in Perkins funding have been able to apply for direct state funding through the CTE state pilot.

In the fall of 2019, the New Mexico Public Education Department (PED) facilitated *stakeholder engagement* meetings which initiated authentic collaboration between businesses and target industries, and the educators and families in their region. This 4-year plan continues to refine the state's vision for CTE based on feedback received, whereby business and industry engage in collaboration with K-12 and postsecondary educators, guided by relevant state agencies including Public Education, Higher Education, Workforce Development, and Economic Development.

Beginning in the winter of 2020, the *comprehensive local needs assessments* serve not only as the foundation for support, development, improvement and approval processes for all New Mexico funded programs of study, but also are creating the forum for continued collaboration among those participants who first engaged in these stakeholder meetings. The needs assessment uses labor market information and the state's economic development plan to identify the educational needs that best address the needs of employers, growth industries, and New Mexico families.

Effective in the grant year beginning July 1, 2020, the state will require, to the greatest extent practicable, a *regional-association* organizational structure for CTE funding. Each regional association will include secondary, postsecondary, and industry partners, and will center on sequential programs of study within a single local *priority regional sector*. Funding decisions for secondary and postsecondary institutions, whether state or federal, will be prioritized by all members of the regional, workforce-aligned association.

Each association will bring community stakeholders, state agency representatives, and education partners together to develop and inform the comprehensive local needs assessment. With the input of business and industry, programs of study developed and supported by all regional association partners will be highly effective at meeting the needs of employers, the community, and special populations.

In this system of organization, we expect that most regional associations will have a business or association as the lead entity that unites secondary and postsecondary educators to develop an aligned program of study, with a clear pathway from early high school through postsecondary studies and certifications. Vision and leadership from non-educational partners will be a *required element* for every

regional association, yet to be clear, vision and leadership of program is to be collaborative by design. Business and industry are not expected to provide an exclusive leadership function and educator concerns about equity, in particular, will be an important consideration for the regional associations.

The PED will serve in an ongoing organizing and leadership role in developing and maintaining regional associations, and will cultivate regional associations in all geographical regions. Stakeholder engagement and coordinating meetings will help relevant parties develop a shared vision of collaboration for comprehensive programs of study that address essential aspects identified in the comprehensive local needs assessment. We are building a multi-agency partnership including the Departments of Workforce Solutions, Economic Development, and Higher Education. We aspire to having regional workforce boards as highly engaged planning partners that provide leadership for the vision laid out in regional association applications.

All funded programs of study will address academic, technical, and social skills. A strong academic core that prepares the learner to enter the workplace with high level, contextually relevant and applied competencies in the areas of mathematics, reading, language arts and science must be included in every approved program of study. Technical skills must be aligned to the state's common career technical core, delivered through a sequential progression of increasingly sophisticated technical courses. Explicit training in employability-skills and leadership development will be a required aspect and a shared responsibility of all regional association partners.

An important component of the state's comprehensive CTE plan is funding. In 2019, New Mexico embarked on a seven-year CTE pilot, and allocation of those funds to support secondary CTE is included in the vision described in this plan. In addition, New Mexico funds CTE through federal dollars received via the Carl D. Perkins grant. New Mexico will make pooled regional association allocations of the federal formula funds, based on an initial split of half secondary and half postsecondary. Association partners will determine how best to distribute their allocations to their members (subgrantees). Individual associations may decide that postsecondary recipients can commit to additional responsibilities, and in exchange these postsecondary partners may receive an increased funding allocation compared to the 50/50 split computation. Specifically, institutions of higher education may use an increase in funding to facilitate local advisory committee meetings and to work with secondary partners to address dual credit and secondary instructor professional development needs. Secondary subgrantees will receive state CTE pilot funds as well, so individual secondary agencies likely will receive more CTE funding than they have

In sum, New Mexico's CTE plan rests on these critical elements:

- **Regional Applications:** Partnerships across K-12 education, postsecondary education and workforce and industry such that programs of study are fully aligned and lead directly to careers;
- **Labor Market Data Use:** Extensive use of labor market data to validate funding decisions;
- **Needs Assessments:** Association partners engage in authentic, data-driven conversations to ensure a tight match between CTE programs and labor market needs;
- **Increased Access:** Funding processes promote programs that bring quality career-technical education to all students.

## II. NARRATIVE DESCRIPTIONS

### A. PLAN DEVELOPMENT AND CONSULTATION

1. Describe how the State plan was developed in consultation with the stakeholders; that is, (A) in consultation with—
  - i. representatives of secondary and postsecondary career and technical education programs, including eligible recipients and representatives of 2-year minority serving institutions and historically Black colleges and universities and tribally controlled colleges or universities in States where such institutions are in existence, adult career and technical education providers, and charter school representatives in States where such schools are in existence, which shall include educators, faculty, school leaders, specialized instructional support personnel, career and academic guidance counselors, and paraprofessionals;
  - ii. interested community representatives, including parents, students, and community organizations;
  - iii. representatives of the State workforce development board;
  - iv. members and representatives of special populations;
  - v. representatives of business and industry (including representatives of small business), which shall include representatives of industry and sector partnerships in the State, as appropriate, and representatives of labor organizations in the State; representatives of agencies serving out-of-school youth, homeless children and youth, and at-risk youth, including the State Coordinator for Education of Homeless Children and Youths;
  - vi. representatives of Indian Tribes and Tribal organizations located in, or providing services in, the State; and
  - vii. individuals with disabilities; and(B) in consultation with the Governor of the State, and the heads of other State agencies with authority for career and technical education programs that are not the eligible agency, with respect to the development of the State plan.

New Mexico developed the State Plan with extensive consultation with all stakeholders, and hired a neutral third party to facilitate engagement meetings. Regional stakeholder meetings discussed the vision of the state plan, including operational considerations. The meetings for regional audiences included all of the stakeholder categories, (i) through (viii).

Communication on how to access information and participate in decisions related to the development of this 4-year plan included email and web-based resources. Notices of meetings included use of existing structures: list-serves, advisory and governing boards, task forces, commissions, working groups, committees, and statewide public hearings.

2. Describe how the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education was developed after consultation with the Higher Education Department, other bureaus, divisions and sections of the PED and the state agency responsible for adult education.

(If a State agency, other than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary.)

The New Mexico Department of Workforce Solutions holds monthly meetings for all stakeholders of the Workforce Investment Opportunity Act (WIOA). During these monthly meetings, the PED's plan for Perkins funding has been discussed, especially with regard to adult learners. The Higher Education Department's representatives for adult education are active participants in these partner meetings.

3. Describe opportunities for the public to comment in person and in writing on the State plan.

The transition plan was posted online for over 90 days and available for public comment both in person and in writing. An earlier version of this 4-Year Plan was also posted online for over 90 days for public comment. The PED distributed electronic surveys of the plan throughout the state to identified stakeholders and the public. New Mexico stakeholders have been receptive to this form of public comment, with over 170 responses for the transition plan and 239 for the final plan. Additionally, New Mexico State University facilitated seven regional meetings. Both survey and in person meetings provided opportunities for interested individuals to provide feedback in person.

## **B. PROGRAM ADMINISTRATION AND IMPLEMENTATION**

### **1. STATE'S VISION FOR EDUCATION AND WORKFORCE DEVELOPMENT**

- a. Provide a summary of State-supported workforce development activities (including education and training) in the State, including the degree to which the State's career and technical education programs and programs of study are aligned with and address the education and skill-needs of the employers in the State identified by the State workforce development board.

The College and Career Readiness Bureau (CCRB) of the PED works in collaboration with the state's labor agency, the DWS. New Mexico is divided into four development regions, each with a regional workforce board. The state workforce board serves in an advisory capacity to the DWS, including in matters of the local boards. The PED holds an appointed seat on the statewide workforce board, and CCRB staff attend the regional workforce board meetings.

New Mexico's Economic Development Department (EDD) sets strategic vision for target industries and CCRB collaborates with them as well as with DWS. CCRB has a seat on the Job Training Incentive Program oversight board, which funds classroom and on-the-job training in expanding or relocating businesses.

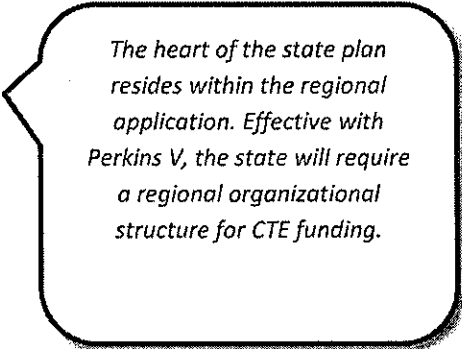
Perkins secondary and postsecondary applicants use New Mexico labor market data to validate funded workforce learning experiences, internships, and pre-apprenticeships. DWS staff partner with CCRB staff to educate stakeholders about business incubators, economic development endeavors, One-Stop Center services, and other business resources. DWS staff provide professional development to educators, serve as CTE advisory committee members, and coordinate workforce participation in career technical student organizations.

In addition to the four workforce regions of New Mexico, the state also has seven economic development regions, administered by the Economic Development Department (EDD). The state strives to align the strategic vision and mission of multiple agencies. CCRB endeavors to align the state's CTE programs to both existing opportunities administered by DWS and potential industry growth opportunities envisioned by EDD. New Mexico's CTE plan is an opportunity for both PED and HED to jointly lead educational programs toward pathways resulting in living-wage, high-growth, and in-demand careers.

New Mexico's use of the stakeholder engagement process, the comprehensive local needs assessment process, and the regional association application described in detail below, has started to drive authentic collaboration between multiple agencies and businesses and target industries. New Mexico is a large, rural state, and aligning our educational programming to the economic needs of existing and future employers will require extensive dialogue. To support this process, we used neutral facilitators to lead meetings for both stakeholder engagement and comprehensive local needs assessments.

- b. Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals.

The state's strategic vision and goals for preparing an educated and skilled workforce has been shaped by stakeholder engagement and input. The heart of the state plan, however, resides within the regional association application. Effective with Perkins V, the state will require, to the greatest extent practicable, a regional association-based organizational structure for CTE funding.



*The heart of the state plan resides within the regional application. Effective with Perkins V, the state will require a regional organizational structure for CTE funding.*

New Mexico considers a *regional association* to be a collaborative partnership consisting of at



least one secondary partner, one postsecondary partner, and one entity representing business or industry, with the business entity serving as the lead partner for establishing vision and setting priorities for CTE funds. This is a shift from a structure centered on subgrantees, which has been in place for decades. Beginning in July 2020, funding for districts and higher education institutions will require, to the greatest extent practicable, participation in a workforce-aligned regional association.

Each regional association will bring community stakeholders and partners together to develop and inform a comprehensive local needs assessment. With the input of workforce partners, programs of study developed and supported by all regional association partners will be highly effective at meeting the needs of employers, the community, and special populations.

In this system of organization, we expect that all regional associations will have one or more business-centric partners as the lead entity. A target industry association, or a large employer, will be the lead entity that unites secondary and postsecondary subgrantees to develop aligned programs of study that offer a clear pathway from early high school through postsecondary studies, continuous through certifications workforce recognizes as essential. In some cases, the regional association may instead be coordinated by a subgrantee, most likely a higher education institution. The regional workforce development and economic development boards will also be involved as advisors. Small subgrantees may enter into an agreement with a larger partner or with a Regional Education Cooperative (REC) to act as a

*Vision and leadership from non-educational partners will be a required element for every regional association.*

fiscal agent. To be clear, most current subgrantees will retain their status as fiscal agents, however, vision and leadership from non-educational partners will be a required element for every association.

The PED will serve an organizing and leadership role in developing regional associations. The PED will cultivate regional associations in partnership with DWS, EDD, and HED. Stakeholder engagement and coordinating meetings will help relevant parties develop a shared vision for comprehensive programs of study that address essential aspects identified in the comprehensive local needs assessment.

The regional association structure and comprehensive local needs assessments will provide the framework to align the state's career and technical education programs to support the state's visions and goals for preparing an educated and skilled workforce.

- c. Describe the State's strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system.

The state's strategy is to strengthen interagency collaborative efforts that leverage funds and programs through the state plan. Regional meetings connect the vision for the state's career and technical education programs with the state's workforce development and economic

development systems. Interagency commitment to a strategic state vision and goals for preparing an educated and skilled workforce helps braid initiatives to work more closely together.

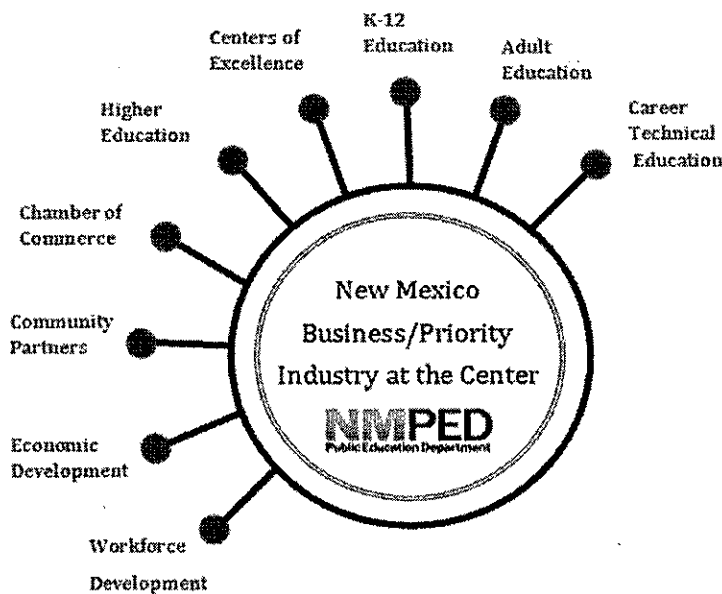
Joint planning, alignment and coordination of effort, and leveraging of funds between CTE programs and workforce development programs began with meetings to fulfill the requirements of required partners within the WIOA scope of work. Additional meetings have been held with DWS to introduce a broader vision to the work involved to support career and technical education programs within the state.

As a product of these efforts, NM Workforce Connection Centers have enhanced their presence at community colleges, and they are thoroughly integrating workforce connection services into the community college experience. This is especially true concerning Workforce Connection Center offerings of job search and employability-skills training.

- d. Describe how the eligible agency will use State leadership funds.  
(Refer to section 112(a) (2) for purposes of State Leadership Activities.)

State leadership funds will support a variety of efforts, and in accordance with the Act, will support non-traditional learners, special populations, and state supported institutions.

Beyond these required uses, leadership funds will be targeted to bring together stakeholders working on similar goals in workforce development, broadly, and career technical education, more specifically. In early 2020, the initial regional meetings throughout the state convened to support authentic engagement between employers, educators, and other interested parties such as non-profits. We will use WIOA regional boards as one organizing structure but will also rely on other existing networks, especially those associated with existing higher education institution advisory committees and with high school career technical student organizations, such as FFA, TSA, and EdRising.



2. IMPLEMENTING CAREER AND TECHNICAL EDUCATION PROGRAMS AND PROGRAMS OF STUDY

Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of study to be developed at the State level and made available for adoption by eligible recipients.

Comprehensive needs assessments serve as the foundation for support, development, improvement and an approval process for all New Mexico funded programs of study (POS). Each association will center on at least one sequential program of study, and some regional associations may support multiple POS.

*Comprehensive needs assessments serve as the foundation for support, development, improvement and an approval process for all New Mexico funded programs of study.*

In New Mexico, the term *program of study* will mean a course sequence that begins in high school, extends into postsecondary education, and leads to industry-recognized certificates, credentials of marketable value, and/or educational degrees. In all cases, the POS will align to one of the national career clusters and one pathway, but a single POS may have multiple occupational codes associated with it. All programs of study will include the opportunity for dual credit, advanced placement, or pre-apprenticeship capstone courses.

- b. Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will—

New Mexico has developed a comprehensive set of recommended secondary course sequences for programs of study. This set has been applied to the administration of state CTE funding referred to as NextGen and will also be used as the foundation for secondary Perkins V programs. Additional programs may be developed in consultation with stakeholders and after collaborating with all members of the regional association. Subsequent additions will be evaluated annually.

The criteria for approval include evaluating programs of study in terms of the comprehensive local needs assessments, to ensure that the programs adequately address those requirements. This process begins with considering the comprehensive local needs assessment, which factors in regional labor market information, state workforce needs, economic development needs, and the needs of the special populations identified in the Act.

Regional associations will submit a joint proposal narrative and each subgrantee will develop a budget outline via an internet-based grant management application portal. State CTE staff

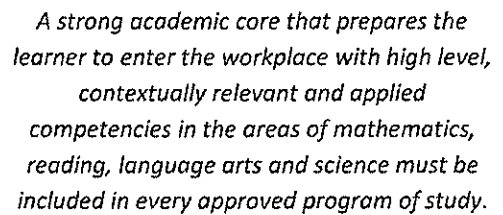
will review the submission to verify that the programs of study proposed are rigorous and consistent with statewide needs.

- i. promote continuous improvement in academic achievement and technical skill attainment;

Both academic achievement and technical skill attainment are essential elements for adopted programs of study, and a cyclical review of programs will ensure a continuous improvement process is incorporated.

New Mexico's program of study framework will set the parameters for and direct LEAs on implementation with fully integrated high school academic standards. These academic standards, coupled with a non-duplicative sequence of CTE courses, reflect the state's commitment to the development of programs of study that adequately prepare students to succeed in postsecondary education and the workplace.

A strong academic core that prepares the learner to enter the workplace with high level, contextually relevant and applied competencies in the areas of mathematics, reading, language arts and science must be included in every approved program of study.



*A strong academic core that prepares the learner to enter the workplace with high level, contextually relevant and applied competencies in the areas of mathematics, reading, language arts and science must be included in every approved program of study.*

Inclusion of a rigorous academic

core for all CTE programs helps prevent academically under-prepared students from being "tracked" into CTE as an easier alternative. All students must meet state academic standards, regardless of their chosen program of study or future life goals. Building rigorous academic content into CTE courses ensures that CTE students have essential knowledge in how to apply core academics to their career choice.

The number of industry-recognized certifications available to students has increased steadily over the years, promoting continuous improvement in technical skill attainment, and increasing options for participants and broadening the scope of career technical education.

- ii. expand access to career and technical education for special populations; and

New Mexico is committed to expanding special populations' access to CTE. PED provides data, disaggregated by gender, race, ethnicity, and several other classes of special populations to association members. Annual performance evaluation for each subgrantee includes a comprehensive review of both access and performance equity gaps.

New Mexico does not currently track some populations listed in the Act. Within our higher education institutions, institutional researchers report that they may not be able to track military connected students, especially for adult learners over the age of 24. Furthermore, we are aware of privacy issues surrounding students who are in or have aged out of foster care. As such, New Mexico proposes that foster care youth (sub-section H) and youth with active duty military parents (sub-section I) be limited to students under the age of 25. Similarly, the single parents special population (sub-section D) is proposed to include only individuals who self-identify as single parents with children under the age of 25. That being said, New Mexico intends to support subgrantees in expanding access in whatever ways are possible.

- iii. support the inclusion of employability skills in programs of study and career pathways.

New Mexico intends to support the development of employability skills through the program of study review process. To support that goal, programs of study will be encouraged to incorporate relevant curricula, work-based learning, and student organizations whenever possible.

- c. Describe how the eligible agency will—

- i. make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;

New Mexico continues to develop and make resources available through the College and Career Readiness Bureau website in support of guidance and advisement, including web resources and printed materials. We will work with regional associations to develop materials that advertise and market specific programs of study specific to each region. To the extent practicable, we will provide program of study information and resources in a language students, parents, and educators can understand, especially for English Learners and families whose home language is not English.

- ii. facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;

New Mexico's model of regional association-based administration of Perkins V funding will facilitate collaboration as a product of organizing all CTE activity into regional associations. In spring of 2020, ten regional meetings were organized to facilitate

comprehensive local needs assessments. All associations will organize geographically to ensure collaborative communications.

Regional associations will be required to hold meetings at least twice per year for purposes of planning, operating and evaluating their programs.

- iii. use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;

New Mexico's intended administration of Perkins V funding in an association-based model permits resource allocation to programs of study that are supported by labor market information. Historically, state workforce development boards have not served as advisory partners for educators. Local or state-level research on the efficacy of programs of study and their alignment to labor market research has been perfunctory at best. With regional associations as the organizational principal for administration, well-informed, data-supported programs will be the basis for maximizing investments.

- iv. ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;

New Mexico ensures equal access to approved CTE programs of study and activities for special populations through a careful evaluation of existing access as a component of the comprehensive local needs assessment.

Gap analysis specifically addresses the presence of special population representation in CTE programs by percentage as compared to special population representation within the entire LEA. Disparities in representation across special populations are noted.

When gaps in access are identified, the PED staff support subgrantees in improving access. Strategies and action plans incorporate a broad frame of reference and are situation specific.

- v. coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;

A representative from the PED attends state workforce board meetings and has initiated dialogue to leverage regional workforce boards as partners. Regional boards were active partners in the comprehensive local needs assessments across the state and are serving as association leads in some regions.

- vi. support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and

The regional association model supports effective and meaningful collaboration

*The association will utilize a single advisory committee to ensure a shared vision between secondary schools, postsecondary institutions, economic development partners and employers.*

between secondary, postsecondary and employer partners. The association will utilize a single advisory committee (per program of study) to ensure a shared vision between secondary schools, postsecondary institutions, economic development partners and employers. Regional

association meetings will provide planning and scheduling of work-based learning activities, including worksite visits, internships, mentorships and other hands-on and inquiry-based learning activities. In addition, the Department of Workforce Solutions and the NM PED have recently committed to increased collaboration by hiring a Youth Work-based Learning Coordinator. The position receives salary support from both departments and is designed to support and coordinate initiatives of the two departments that relate to career and technical education and work-based learning opportunities.

- vii. improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations.

The comprehensive local needs assessments clarified desired outcomes in regard to some notable performance gaps. Applying the regional association model to all CTE programs will bring in numerous thought partners to support the vision of each unique plan. The regional collaboration can leverage community human capital to ensure high quality program outcomes. With the additional member resources that the regional association provides, meaningful inclusion of special populations, improving performance outcomes, and reducing performance gaps will be much more attainable than in the past.

- d. Describe how the eligible agency, if it chooses to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college high school, or competency-based education.

New Mexico intends for all programs of study to include course sequences that include transitional coursework for high school students. Recommended course sequences have already incorporated dual credit coursework or other highly rigorous capstone

*All programs of study include transitional coursework for high schools students.*

experiences. The postsecondary member will identify the dual credit, advanced placement, or apprenticeship course offerings to ensure that the high school program aligns well to the postsecondary program.

New Mexico has several early college high schools. Enrollment and access occur as a product of advisement in 8<sup>th</sup> or 9<sup>th</sup> grade, and student interest is a key element in determining placement.

In New Mexico, the term “concurrent enrollment” does not mean “dual credit” and does not provide credit for high school electives nor high school graduation requirements. While dual credit courses are offered without cost to high school students, concurrent enrollment requires students to pay tuition. Therefore, CTE programs of study will not specify concurrent enrollment opportunities.

- e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs.

New Mexico will continue to convene regionally-based meetings to provide an opportunity for parents, educators, administrators, faculty, counselors, business community members, labor organization representatives and tribal representatives to participate in New Mexico’s CTE planning. A survey instrument was used to collect plan feedback and future surveys will be utilized for ongoing evaluation.

- f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V.

The PED local application template is included with this submission of New Mexico’s 2020 4-Year State Plan.

- g. Include a copy of the local needs assessment template that the eligible agency will require eligible recipients to submit pursuant to section 134(c) of Perkins V.

The PED comprehensive local needs assessment template is included with this submission of New Mexico’s 2020 4-Year State Plan.

- h. Provide the definition for “size, scope, and quality” that the eligible agency will use to make funds available to eligible recipients pursuant to section 135(b) of Perkins V.

#### **Size**

CCRB staff evaluate each program of study from a statewide labor market perspective. A key consideration is an analysis of the number of recent high school and postsecondary program



of study concentrators, to determine if the statewide program is too large for the expected job opportunities in the state.

To determine if a secondary program is of sufficient size, it must include at least two aligned courses within the approved program of study sequence. In addition, a secondary program must include an aligned advanced transition course, including advanced placement, dual credit, or an apprenticeship. Evaluation of adequate size also depends on the amount of physical equipment available, the amount of monetary award, the number of staff involved, and the average number of students served each year.

For a postsecondary evaluation of size, CCRB staff consider the number of statewide program completers in relation to the number of projected job openings, as published by the DWS. In the case of postsecondary programming, staff consider the possibility that the program is too large, as well as too small.

### **Scope**

Regionally prioritized and state-recommended programs of study are articulated beginning in grade nine continuing through postsecondary credential attainment. Secondary and postsecondary institutions memorialize their working agreements within the CTE application. Working agreements include fiduciary agent agreements, pooled policies and procedures, and dual credit agreements. While a small subgrantee might be unable to generate all elements of a program of study that is of sufficient scope, the association as a whole must meet evaluations of scope, in order to receive funding.

### **Quality**

Funded programs of study in New Mexico lead to living wage, high skill and in-demand occupational outcomes.

### ***Living Wage***

New Mexico defines living wage careers for CTE programs of study as careers leading to a wage that can sustain a family. The federal guideline for reduced price lunch is 185% of the federal poverty guideline, and New Mexico defines a family as a household of three or more. Therefore, for a career to qualify as living wage, the median salary for that career, in New Mexico, must meet or exceed 185% of the federal poverty guideline for a family of three. For 2018-19, wages as defined by this standard are \$38,443<sup>1</sup> annually. For reference, the 2016-17 mean salary in NM was \$44,840.00<sup>2</sup>.

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<sup>1</sup> <https://www.federalregister.gov/documents/2018/05/08/2018-09679/child-nutrition-programs-income-eligibility-guidelines>

<sup>2</sup> [https://www.bls.gov/oes/2017/may/oes\\_nm.htm](https://www.bls.gov/oes/2017/may/oes_nm.htm)

### **High Skill**

High skill careers are found in occupations requiring completion of an apprenticeship, an industry-recognized certificate or credential, or a postsecondary certificate or degree.

### **In-demand**

Careers are considered in-demand when demand for particular careers exceeds supply. State, regional or local labor market data must document the demand. When demand exceeds projected employment supply for careers that are not living wage, approved programs of study must lead to a living wage or high skill career. Such a program might also adequately prepare learners for the in-demand career, but the living wage or high skill career, not the in-demand career, must be the target career for the program.

*When demand exceeds projected employment supply for careers that are not living wage, approved programs of study must lead to a living wage or high skill career.*

### **Evaluation Indicators for Size, Scope, and Quality**

New Mexico intends to evaluate the regional association within which the program applies, in order to allow for a broad view of the program's size, scope, and quality.

Programs of study at both the secondary and postsecondary level must meet definitions of size, scope, and quality in order to receive funding. Funded programs of study are considered "approved" programs of study for accountability purposes.

New Mexico has elected to report postsecondary attainment as its formal indicator of quality (D.1.b). In addition, secondary programs will also be evaluated on the other two indicators of quality (certificates and work-based learning). To evaluate *size* and *scope*, association applications will report the percentage of secondary and postsecondary students who are CTE participants, and the percentage who are CTE concentrators. CTE concentrator counts will be evaluated in terms of the expected number of job openings, and the state will prioritize funding into those programs that offer the best prospects for future employment.

## **3. MEETING THE NEEDS OF SPECIAL POPULATIONS**

- a. Describe its program strategies for special populations (individuals with disabilities, economically disadvantaged, non-traditional, single parents including single pregnant women, out-of-workforce, EL, homeless (McKinney-Vento), youth in or aged out of foster care, youth with a parent who is on active duty), including a description of how individuals who are members of special populations—
  - i. will be provided with equal access to activities assisted under this Act;
  - ii. will not be discriminated against on the basis of status as a member of a special population;
  - iii. will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance

- described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;
- iv. will be provided with appropriate accommodations; and
  - v. will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment.

New Mexico adheres to federal and state procedural safeguards designed to protect and safeguard legal rights. This adherence underscores the requirements of Perkins that all students have equal opportunity to receive publicly funded services. Special population students will not experience discrimination based on their status and will be provided with appropriate accommodations to promote parity in success.

New Mexico's strategy for meeting the needs of special populations begins with data monitoring: gap analysis is applied at the subgrantee level, as a check to discover those subgrantees that may not be adequately including special populations in their CTE programs. The analysis compares special population data at the district level or institutional level and their specific career technical education enrollment. After reviewing the results, PED and the subgrantee work together to generate a strategy to eliminate disparities that are identified.

The regional association will include school counselors and social service organizations that represent special population interests. This may include representation from organizations as diverse as the NM Children, Youth and Family Division, NM Division of Vocational Rehabilitation, homeless shelters, private foster care agencies and teen parenting programs. Thus represented, special populations will be included in association-supported programs designed to enable them to meet or exceed performance expectations and competitively enter the workforce in high skill, living wage, or in-demand industry occupations of their choosing.

#### 4. PREPARING EDUCATORS AND FACULTY

- a. Describe how the eligible agency will support the recruitment and preparation of educators, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations.

New Mexico understands that data analysis is an important step in ensuring programs meet the needs of special populations. Training staff with the knowledge and skills needed to evaluate gaps in service, and then training staff to support special population students is an essential expectation for funds. The regional association model of administration creates sensitivity to special populations by establishing clear expectations regarding equal access.

In addition, New Mexico intends to bring diverse non-governmental partners to the conversation in support of applicants. Inviting partners who represent special population interests will help members to evaluate their constituents' needs in a comprehensive manner, and build supports that are sensitive to their unique needs.

**c. FISCAL RESPONSIBILITY**

1. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—

*The regional lead may be a large employer, an industry-focused association, or an institution of higher education.*

The process and criteria for how New Mexico approves eligible recipients for funds under this Act is similar to the process and criteria employed across prior years; however, applicants are now required, to the greatest extent practicable, to submit a regional association application. The regional lead collaborates with members of secondary districts and postsecondary institutions to develop an application vision

and narrative that will support a program of study leading to living wage, high skill, and in-demand careers. The regional lead may be a large employer, an industry-focused association, or an institution of higher education. The regional lead is responsible for facilitating advisory meetings and ensuring that postsecondary certifications are industry-recognized by New Mexico employers.

The PED process of approving applications, including funding requests for specific programs of study, utilizes a committee review process, by all Perkins coaches, in an intensive forum. In this forum, the Perkins coach who serves as the subject matter expert for the program of study presents to the rest of the committee details of the application in support of the merit of the application, including:

- 1) Number of years that the program has been funded.
- 2) Labor market information evidencing expected student outcomes.
- 3) The composition of local advisory committees and the integration of local industry representatives.
- 4) Integration with career technical student organizations.
- 5) Supports for non-traditional students and special populations.
- 6) Integration of work-based learning, advanced placement courses, and dual credit coursework into the sequence of courses.

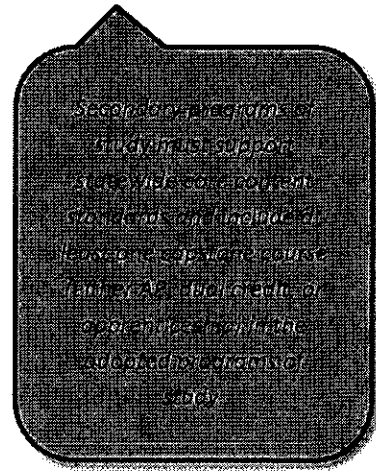
Reviewing applications and approving programs of study in this manner enhances program quality and encourages best practices in administrative oversight.

- a. each eligible recipient will promote academic achievement;

The program of study application and approval framework includes evaluation of academic achievement. Secondary programs of study must support statewide academic core content standards and include at least one capstone course (either AP, dual credit, or apprenticeship) in the adopted programs of study.

- b. each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and

Each eligible recipient will promote skill attainment via the process described above, which directs subgrantees to incorporate industry-recognized certificates and credentials into their approved programs of study.

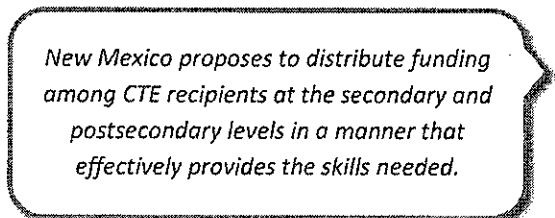


- c. each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations.

The comprehensive local needs assessment is the starting point for purposeful regional association organization and activity. Consideration of local economic and education needs is evaluated along with the needs of industry and employers.

2. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed—

- a. among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace; and
- b. among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace.



New Mexico proposes to distribute funding among CTE recipients at the secondary and postsecondary levels in a manner that effectively provides the skills needed. In recent years, CCRB has repeatedly documented significant

under-utilization of awarded funds by secondary recipients. Simultaneously, CCRB has documented a reduction in the number of secondary awardees across multiple application cycles. Districts that discontinued participation anecdotally report that the paperwork burden of Perkins is “not worth the money received.” Finally, CCRB notes that only a third of secondary districts in New Mexico currently receive Perkins funds.

To address the ongoing difficulties with expending funds for the benefit of secondary students, CCRB proposed two major modifications to the funding formula.

First, PED will waive the \$15,000 funding floor addressed in the Act, so that all districts are eligible to participate, based on the allocation formula specified in the Act. In the past, small districts and state charters have found it difficult to participate, both because of the \$15,000 funding floor, and because consortia applications were not well supported. In addition to waiving the funding floor, PED intends to help regional associations establish funding agent partnerships with Regional Educational Cooperatives (RECs), so that small recipients can utilize an REC as their fiscal agent.

Implementation of the waiver of the \$15,000 funding floor will clarify to small districts and state charters that they can and should participate in a regional application. Since multiple secondary participants will be members of the association, each regional association will be well over the funding threshold specified in the Act. Nonetheless, the state officially requested in the transition plan that the threshold be waived, so that all districts and state charters are explicitly eligible for funding.

Another important component of the funding formula is the allocation between secondary and postsecondary recipients. In the past, secondary and postsecondary recipients split funds evenly. Despite allocating half of available funding to secondary subgrantees, few high school students attain CTE concentrator status and institutions of higher education report negligible numbers of students coming into their programs directly from aligned high school CTE programs.

To alleviate these problems, New Mexico regional associations members may decide to provide their postsecondary partner(s) with an allocation that is greater than the historical 50% split. If adopted by the regional association, the increased funds to postsecondary partners would provide funding to support additional responsibilities commensurate with their increased funding allocation. Specifically, institutions of higher education could be asked to use the increase in funding to facilitate local advisory committees, to support dual credit, and/or to provide secondary instructor professional development. Postsecondary institutions may only be able to provide for these increased responsibilities if additional funding is supplied to support the efforts.

Subgrantees may facilitate professional development and advisory collaboration directly, or may elect to pool funds to facilitate these responsibilities. In such cases, a pooled funds agreement would be memorialized in the application.

3. Provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study and describe how these allocations are distributed to local educational agencies, area career and technical education schools and educational service agencies within the State. (Refer to section 131(a)-(e)).

The PED intends to distribute the basic formula to the regional associations such that the percentage directed to postsecondary and secondary remains unchanged (i.e. a 50/50 split). Association members may increase their financial support of specific partners if the entire association will find such an allocation beneficial to their programs.

Initial allocation of secondary institution funds is as described in section 131 of the Act. Thirty percent of the award is based upon the census population of residents age 5-17, and seventy percent is based upon that percentage of the age 5-17 population that is from families who are below the poverty level.

Charter school allocations will be determined by assigning a proportionate share of the district in which they are located, by using the number of charter school students in grades 9-12 as compared to the number of all students in grades 9-12 enrolled in the district as a whole (including the charter).

All possible awardees will be included in calculations and offered participation in Perkins, via the regional association application. Awards to the regional association will require that subgrantees complete an application, therefore it is possible that not all eligible entities will receive awards.

4. Provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortium of eligible institutions within the State.

Distribution of postsecondary institution funds is based upon the formula as described in section 132 of the Act. The award is based upon the count of postsecondary students that receive Pell and/or BIE funds, in proportion to the count of such students at all postsecondary subrecipients. Reserve and redistribution funds will be handled as described above.

5. Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education.

No changes to school district boundaries have been made since population and enrollment data was last collected. In the event of future changes, the data used to make the allocations will be adjusted for accuracy and to ensure that allocations remain data-driven.

6. If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—
  - a. include a proposal for such an alternative formula; and
  - b. describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

The State of New Mexico has formally requested a waiver to the secondary allocation of section 131. New Mexico intends to allocate funding to all secondary applicants, regardless of award size – in other words, we intend to disregard the specified \$15,000 floor specified in the Act. Applicants will apply as part of a regional association, so the \$15,000 restriction is unlikely to have an impact on the regional association; however, the state is still requesting a formal waiver of that requirement so that it is very clear that all districts are eligible.

*New Mexico intends to allocate funding to all secondary applicants, regardless of award size.*

The state also intends to offer formula-based awards to both state and local charters. PED will split district awards in order to accurately provide an allocation to charters that are operating outside of the fiscal oversight of their district location. Charter awards will be calculated by establishing the proportion of students served by the charter, in relationship to the total number of high school students in the district. The state believes it is important that charters have access to the benefits offered by a regional association application and wants to encourage their participation. Allocating some funds to charters is a more equitable solution than the current practice of completely excluding them from CTE funding. Therefore, the state requests a waiver of the allocation based on census data, and instead, plans to award funds to charter schools based upon enrollment data.

In the state's Perkins IV application, rural communities were defined, but the definition was not used to support distributing basic formula grant funds to small districts located in these communities.

Waiving the \$15,000 eligibility requirement allows the state to distribute the grant funds in a more equitable manner throughout the state, especially to rural communities of New Mexico, than has been achieved historically. This change also reflects that the economic data shows that New Mexico's rural communities are more impoverished than the state's urban communities.

The waiver request also acknowledges and supports the state vision to move toward making all funding decisions based on regional association applications that reflect industry-driven,



community-supported sector partnerships for comprehensive program alignment. These collaborations allow large districts and postsecondary institutions to serve as fiscal agents for smaller recipients, and the regional associations will include numerous community partners representing small business, industry, professional organizations, WIOA partners, Workforce Development Boards and other governmental organizations that support CTE.

Applying this new method of funding delivery, New Mexico will administer Perkins funds to a larger group of subgrantees. This will improve access to CTE in impoverished rural communities. The community partnership underpinning the regional application will also improve effectiveness via greater coordination and organization in program of study service delivery throughout the entire state.

7. If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—
  - a. include a proposal for such an alternative formula; and
  - b. describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the state that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution.

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

The State of New Mexico has a total population of slightly more than 2 million persons, and over 121,000 square miles of land, and therefore the state is predominately rural and sparsely populated. To provide adequate access to postsecondary opportunity, it has 25 public postsecondary institutions, including 7 four-year public colleges, 10 branch-campus community colleges, and 8 two-year community colleges; it also has 7 Tribal colleges. Most of these institutions are located in rural, sparsely populated areas with large concentrations of economically disadvantaged individuals. To facilitate successful CTE postsecondary programs that reach all New Mexico residents, each postsecondary has been assigned to one regional association (a total of ten regional associations). Most associations have more than one postsecondary institution. The regional associations each submit a consolidated regional application, using a consortia model to determine local needs and best practices for CTE programming. Accordingly, each regional association's postsecondary institutions will receive award amounts in excess of the \$50,000 threshold.

*New Mexico intends to allocate funding to all postsecondary applicants, regardless of award size.*

8. If the eligible agency will award reserve funds to eligible recipients under section 112(c) of Perkins V, describe the process and criteria for awarding those funds.

The state will hold minimal amounts of the initial basic grant (formula) funds in reserve at the beginning of the grant period (5% or less). Funds that remain unused by subgrantees at the end of the 12 month period will be redistributed on a competitive basis under the rules of section 131, up to fifteen percent as allowed by the Act. PED will distribute reserve funds on a competitive basis, with no pre-determined allocation between secondary and postsecondary recipients. The PED will announce competitive award programs at the annual applicant workshop. CCRB coaches will score applications for competitive awards with a rubric. Funds will support top scoring applications, depending on available redistribution amounts and the goals of that year's reserve strategy.

9. Provide the State's fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary's annual determination on whether the State has maintained its fiscal effort, and indicate whether the baseline is a continuing level or new level. If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)

The state will demonstrate that it has maintained its fiscal effort using a baseline at a continuing level.

#### **D. ACCOUNTABILITY FOR RESULTS**

1. Identify and include at least one (1) of the following indicators of career and technical education program quality—
  - a. the percentage of CTE concentrators (see Text Box 2 on the following page) graduating from high school having attained a recognized postsecondary credential;
  - b. the percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or
  - c. the percentage of CTE concentrators graduating from high school having participated in work-based learning.

New Mexico will use indicator b for its measure of program quality. 5S2: Post-secondary Credits will be defined as:

Numerator: Number of CTE concentrators who graduated from high school having earned credit in a postsecondary dual credit course in the relevant career and technical education program of study.

Denominator: Number of CTE concentrators who graduated from high school during the reporting year.

New Mexico will operationalize “earned credit” as students who are reported as dual credit enrollees at the end of the relevant semester data reporting period. New Mexico secondary schools report enrollment in dual credit courses, but do not report grades for postsecondary courses. However, liberal drop policies for dual credit students ensure that almost all students who remain enrolled in a dual credit course through the end of the term will successfully complete the course. Therefore, end of semester enrollment will serve as a proxy for having earned credit. New Mexico will update its definition if additional data about credit attainment become available at a later date.

Include any other measure of student success in career and technical education that is statewide, valid, and reliable, and comparable across the State.

(Refer to Section 113(b)(2)(A)(IV)(II) of Perkins IV)

New Mexico also considered other measures of student success in CTE that are valid, reliable, and comparable across the state; however, New Mexico will only use any additional measures internally, rather than adding other measures to the federal plan.

Provide the eligible agency’s measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

New Mexico will not be reporting additional measures.

2. Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined levels of performance for each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the state. (Section 113(b)(3)(A)(i)(I) of Perkins V)

This 2020 4-Year State Plan includes *draft* state determined targeted levels of performance for each of the secondary and postsecondary core indicators.

After consulting with OCTAE in June, 2020, New Mexico intends to define secondary CTE concentrators as students completing two or more courses in approved programs of study, and the post-secondary CTE concentrator definition will remain unchanged from Perkins IV, namely students completing 12 credit hours in a CTE programs of study (regardless of Perkins funding status).

However, calculating baseline performance indicators using these definitions is incomplete at this time. New Mexico will complete its calculations, gather stakeholder comments, and establish targets in the upcoming months. New Mexico will revise the data reported in the plan no later than December 31, 2020.

3. Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—
  - a) a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance (see Text Box 7 for the statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V);
  - b) an explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8; and
  - c) a description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

- a) a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance. (See Text Box 5 for the statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V);

This 2020 4-Year State Plan includes *draft* state determined targeted levels of performance for each of the secondary and postsecondary core indicators. These measures have not gone out for public comment, as they were only completed in May, 2020. Given the very low numbers identified using the definition for concentrators, NM PED requested additional technical support from OCTAE before holding a public comment process.

- b) an explanation for the State determined levels of performance; and

New Mexico will complete its calculations, gather stakeholder comments, and establish targets in the upcoming months. New Mexico will revise the data reported in the plan no later than December 31, 2020.

- c) a description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives of other Federal and State laws, (Section 122(d)(10) of Perkins V).

The state intends to set target levels of performance that will promote the attainment of the goals and objectives contained in WIOA, Section 3164(a)(1)(B)(52). That is, the state's performance goals are designed to promote attainment of recognized postsecondary credentials including an industry-recognized certificate or certification,

a certificate of completion in an apprenticeship, a license recognized by the State or Federal Government, an associate degree, or a baccalaureate degree.

As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

New Mexico will complete its calculations, gather stakeholder comments, and establish targets in the upcoming months. New Mexico will revise the data reported in the plan no later than December 31, 2020.

4. Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V).

This 2020 4-Year State Plan includes draft state determined targeted levels of performance for each of the secondary and postsecondary core indicators. These measures have not gone out for public comment, and NM PED requests additional technical support from OCTAE before holding a public comment process.

5. Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V).

New Mexico will address disparities or gaps in performance through a careful evaluation of performance data. Subgrantees will receive detailed data presentations that specifically addresses special population performance in CTE programs as compared to the overall CTE performance. Disparities are noted along with a calculation that provides the exact number of students from the subgroup that would be needed in order for the gap to be closed. The state will work closely with subgrantees to address their gaps, so that the state-level gaps can be mitigated.

If significant performance gaps are identified at the state level, the state may use leadership funds to specifically address those gaps with incentive grants or other statewide initiatives. If meaningful progress is not achieved after the third program year, the state will work with OCTAE to develop an appropriate mitigation plan that takes into account previous efforts.

## **ATTACHMENT 3**