

Congress of the United States

Washington, DC 20515

January 17, 2007

John Haigh, Acting Director
State Administration and Accountability Group
Office of Vocational and Adult Education
U.S. Department of Education
550 12th Street, SW
Potomac Center Plaza, Room 11017
Washington, DC 20202-7110

Dear Director Haigh:

We are writing to express our concern about the treatment of the nontraditional participation indicator and nontraditional completion indicator in the current version of the Carl D. Perkins Career and Technical Education Act of 2006 ("Perkins IV"): Guide for the Submission of State Plans ("State Guide"). As you know, the State Guide envisions combining these two indicators for reporting and accountability purposes. However, this treatment is not in keeping with past practice, and Congress did not consider or discuss combining these two indicators during the reauthorization of Perkins IV. We believe that Congress's intent in Perkins IV to increase accountability for the development of "the academic and career and technical skills of secondary education students and postsecondary education students who elect to enroll in career and technical education programs" would be served best by keeping the reporting of the two indicators separate. As a result, we request that you maintain the longstanding practice of keeping these indicators separate for reporting and accountability purposes.

As you know, the nontraditional participation and nontraditional completion indicators were first included in the Carl D. Perkins Vocational and Applied Technology Education Amendments of 1998 ("Perkins III"). Consistent with Congress's goals in establishing these two discrete indicators, the Department has required states to collect separate data and establish separate goals for nontraditional participation and nontraditional completion since 1998. Although Perkins IV included a technical change to the language describing each indicator, Congress did not indicate any intention to change the way these indicators should be used for reporting and accountability purposes. Therefore, we do not understand the rationale for the change in the latest State Guide.

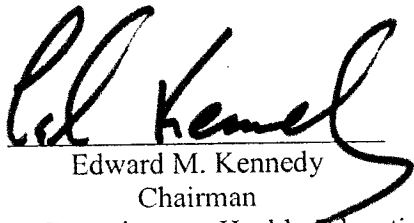
Obviously, the best way to ensure that states are maximizing both the participation and completion of nontraditional students in Perkins-supported programs is to track their progress on each indicator separately. In addition, merging the two indicators now will make it much more

difficult to compare states' performance on these two indicators to their performance in previous years, when the data were reported separately.

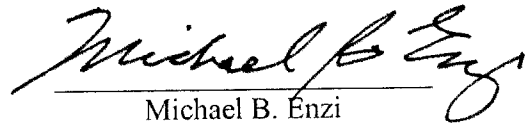
We believe strongly that the law's goal of promoting state and local accountability for Perkins-supported programs would be best served by continuing to treat the two indicators as separate, as has been the practice in previous State Guides.

Thank you for your attention to this matter. If you have any questions, please contact Lloyd Horwich of the Democratic Staff of the House Committee on Education and Labor at 202-225-3725 or lloyd.horwich@mail.house.gov.

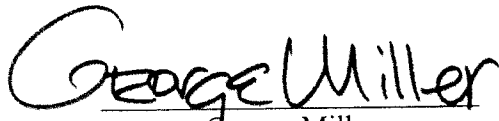
Sincerely,



Edward M. Kennedy
Chairman
Senate Committee on Health, Education,
Labor and Pensions



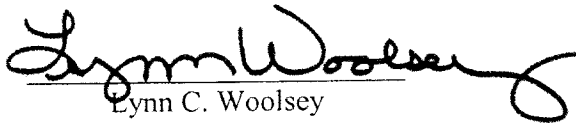
Michael B. Enzi
Ranking Member
Senate Committee on Health, Education,
Labor and Pensions



George Miller
Chairman
House Committee on Education and Labor



Howard P. "Buck" McKeon
Senior Republican Member
House Committee on Education and Labor



Lynn C. Woolsey
Member
House Committee on Education and Labor

Cc: The Honorable Margaret Spellings