

**Public Comments Received During the 30-day Comment Period
and NCES Responses
November 2016**

**Fast Response Survey System (FRSS) 108: Career and Technical Education (CTE)
Programs in Public School Districts**

ED-2016-ICCD-0114-0003

Comments on FR Doc # 2016-25508

Submitter Information

Document: ED-2016-ICCD-0114-0003

Name: Jill Kroll

Address: Lansing, MI, 48909

Government Agency Type: State

Government Agency: Michigan Department of Education, Office of Career and Technical Education

General Comment

Fast Response Survey System (FRSS) 108: Career and Technical Education (CTE) Programs in Public School Districts (OMB Control # 1850-0733)

Recommend that the Department add a question to the survey: "Are the CTE courses or programs about which you are answering these questions, eligible for federal Perkins funding and/or any CTE-specific state funding in your state?" The reason for collecting this information is that districts, particularly in "local control" states, may offer courses that the district may call "CTE" or "vocational education" but which do not meet the state's definition of, nor standards for, Career and Technical Education. In these cases these courses or programs would not be recognized by the state as eligible for federal or state CTE funds. Being able to distinguish between CTE programs recognized by the state agency responsible for CTE and courses offered by districts that do not meet state standards would help to provide a more complete understanding of CTE in the nation.

NCES RESPONSE:

Dear Ms. Kroll,

Thank you for your feedback posted on November 1, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Fast Response Survey System (FRSS) 108: Career and Technical Education (CTE) Programs in Public School Districts. The National Center for Education Statistics (NCES) appreciates your interest in FRSS 108 and your suggestion.

Please note that the Office of Career, Technical, and Adult Education (OCTAE) is interested in collecting data on all CTE programs that meet the survey definition provided to respondents, regardless of whether these programs are eligible for Perkins or CTE-specific state funding. In addition, the question suggested "Are the CTE courses or programs about which you are answering these questions eligible for federal Perkins funding and/or any CTE-specific state funding in your state?" does not take into consideration that some programs may be eligible and some may not be eligible. This question might also add significant burden for some districts because respondents are asked to include CTE programs offered by the district that are provided by other entities, such as community colleges and area/regional CTE centers, for which the district respondent may not have information about the program funding. For these reasons, we do not think this question should be added to the FRSS 108 survey.

Thank you again for your input.

Submitter Information

Document: ED-2016-ICCD-0114-0004

Name: Elaine Perea

Address: Santa Fe, 87501

General Comment

Fast Response Survey System (FRSS) 108: Career and Technical Education (CTE) Programs in Public School Districts (OMB Control # 1850-0733)

Survey Q6 & Q7 "Does your district offer ..."

It might be more appropriate to ask "Do students in your district have access to ..." Unless what you really want to know is about the district's roll in providing the classes.

In our state, postsecondary institutions offer dual credit courses to high school students and districts can enroll students in online courses that are not developed by the district. so "does the district offer" might not get at what is available to students.

NCES RESPONSE:

Dear Ms. Perea,

Thank you for your feedback posted on November 7, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Fast Response Survey System (FRSS) 108: Career and Technical Education (CTE) Programs in Public School Districts. The National Center for Education Statistics (NCES) appreciates your interest in FRSS 108 and your comment.

This comment raises two questions. The first question is whether the survey is limited to CTE programs that districts offer or whether it includes all programs that students have access to. The second question is whether the survey includes CTE programs that districts offer but don't develop or provide. Both questions are addressed by instruction 2 on the instructions and definitions page: "For this survey, include all CTE programs that your district offers to high school students, including programs provided by your district or by other entities (such as an area/regional CTE center, a consortium of districts, or a community or technical college)." This wording was chosen because the Office of Career, Technical, and Adult Education (OCTAE) only wants to obtain data on CTE programs that are offered by public school districts to their students, and not for other programs that may be available for students to take on their own. However, if a district offers CTE programs to their students that are provided by other entities, the instructions indicate that these should be included in the survey responses. Therefore, no changes to the question wording are recommended.

Thank you again for your input.

Submitter Information

Document: ED-2016-ICCD-0114-0005

Name: Steve Voytek

General Comment

Fast Response Survey System (FRSS) 108: Career and Technical Education (CTE) Programs in Public School Districts (OMB Control # 1850-0733)

To Whom It May Concern:

Attached for your consideration are comments in response to this solicitation on behalf of Advance CTE and the Association of Career Technical Education (ACTE).

We appreciate the opportunity to provide feedback and look forward to continuing the conversation.

Thank you,
Advance CTE & ACTE

Attachments

FRSS Survey-- Advance CTE & ACTE Comments_FINAL

Request for Public Comment: Fast Response Survey System (FRSS) 108—Career and Technical Education (CTE) Programs in Public School Districts: FR Doc. 2016-25508

November 21, 2016

ATTN:
Kate Mullan
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To Whom It May Concern:

On behalf of Advance CTE, representing the state and territory leaders of our nation's Career and Technical Education (CTE) system, and the Association for Career and Technical Education (ACTE), representing America's CTE teachers, administrators and counselors, we would like to thank you for the opportunity to provide comments and feedback on the Fast Response Survey System (FRSS) survey #108 on CTE programs in public school districts. The data collected for this survey will be invaluable to our community over the coming years, and we are encouraged and supportive of this effort. We hope the following comments will help improve the collection instrument for this survey before it is released to the field.

While the following comments will provide question-by-question feedback on the instrument, we would like to emphasize two important topics as they relate to this survey: the role of area CTE centers and the use of the terminology "CTE programs of study." As you know, area technical centers are an integral part of states' CTE delivery systems and often provide CTE programming at the secondary, postsecondary, and adult learner levels. Moreover, these centers often are structured differently across the states. Therefore, we encourage you to keep this variability in mind as you finalize this survey.

Second, and equally as important, the instrument uses the term "career pathways" but does not use the term "CTE programs of study"—terminology that is widely used in the CTE community and is a key component of the current *Carl D. Perkins Career and Technical Education Act*. The relationship between CTE programs of study and career pathways is complementary. However, there are many distinctions between the two, and it is critically important that the final instrument reflect these differences. We broadly recommend that "CTE programs of study" be used in lieu of "career pathways" or, at the very least, referenced alongside it. This will make certain respondents fully understand the question being asked and ensure the validity of the data being collected.

In addition to these broad recommendations, we would like to offer the following feedback on specific questions in the instrument:

Question #2: Option “a” for this question should be separated into two parts. Districts often deliver CTE through a single area or regional CTE center OR through a consortium approach. It is vital that the instrument makes this distinction. Further, we recommend that “another school district” be added as an option for this question, particularly since other questions posed in the instrument offer that as an option. Finally, we suggest adding an additional follow-up question in this section specifically on area CTE centers. Since this is an area where there is sometimes a dearth of information, we recommend that this question focus on basic details of a center’s structure such as the number of “feeder” high schools, how many centers exist in a given district, and the number of students served.

Question #4: This question should be restructured to ask about CTE programs of study, rather than a career pathway. “CTE program of study” is a term that is used in the CTE community and, by definition and shared understanding, requires articulation to the postsecondary level.

Questions #5, 6, 7: This is a particularly valuable component to the overall instrument, and for each positive response, we encourage you to add a follow-up question to ask for the specific number of courses provided that meet these criteria. Doing so will give the survey results a more nuanced understanding regarding the frequency of these course offerings.

Question #10: For option “b,” we recommend rephrasing this answer to read, “Serve on a formal CTE advisory committee or council.” As currently written, option “b” could be interpreted too narrowly for respondents to answer accurately. Additionally, we recommend that option “m” be rephrased “Provide training opportunities for CTE teachers, including externships”. This too will avoid the potential for too narrow an interpretation of this response option.

Question #11: Options “d” and “e” appear duplicative. We recommend consolidating these options into a single category.

Questions #13 / 14: For option “h” in both questions, we recommend rephrasing this response to, “Recommendations from your state agency administering CTE.” This change addresses the various state governance structures for CTE which, in some instances, do not fall exclusively to the state department of education. Furthermore, option “i” in both questions should incorporate a reference to CTE programs of study in order to align the survey with the current terminology of the CTE community.

Question #15: The situation described in this question, in our view, is particularly uncommon. We suggest deleting this question from the survey as we do not believe it will yield useful information. Further, we suggest using the newly freed space to make the changes noted for questions 5, 6, and 7.

Again, we thank you for your interest in these issues and for your consideration of our comments. Should you have any questions or interest in continuing the conversation for how CTE can be effectively incorporated into this process, please do not hesitate to reach out to Alisha Hyslop, public policy director for ACTE (ahyslop@acteonline.org), or Steve Voytek, government relations manager for Advance CTE (svoytek@careertech.org).

Sincerely,
Steve Voytek
Government Relations Manager
Advance CTE

Alisha Hyslop
Public Policy Director
ACTE

NCES RESPONSE:

Dear Mr. Voytek and Ms. Hyslop,

Thank you for your feedback posted on November 22, 2016, responding to a 30-day request for comments on proposed changes to the Department of Education's Fast Response Survey System (FRSS) 108: Career and Technical Education (CTE) Programs in Public School Districts. The National Center for Education Statistics (NCES) appreciates your interest in FRSS 108 and your comments.

One of the two overall survey topics mentioned on the first page of your letter is the role of area CTE centers and the variation in their structure across states. Survey staff encountered this variation during the survey development calls conducted with districts across 31 states. The survey was developed to accommodate this variation and the survey wording was tested throughout survey development and in the final survey pretest.

The second overall survey topic discussed in your letter relates to the terms "career pathways" and "CTE programs of study." The data requester for this survey, the Office of Career, Technical, and Adult Education (OCTAE) within the U.S. Department of Education, requested that the term "career pathways" be used on this survey. OCTAE's CTE initiatives are designed to administer state formula and discretionary grant programs under the Perkins Act; provide assistance to states to improve program quality, implementation, and accountability; and establish national initiatives that help states implement rigorous CTE programs. The survey was designed to collect data to meet OCTAE's policy needs, and the specific term "career pathways" was used in the survey at their request. The survey wording was tested during the pretest and respondents did not report any problems with this terminology.

Responses to your comments on individual questions are given below.

Question #2:

- a. You suggested that item "a" be separated into two parts. In early versions of the survey, the category for area/regional CTE center was listed as a separate item from group/consortium of districts. However, during feasibility calls with districts, respondents in some districts reported that the two items were not clearly distinguished for them. For example, some area/regional CTE centers were run by a group or consortium of districts, and these respondents were not sure how to respond to Question 2. Since OCTAE did not need to distinguish between the two items to meet their policy needs, the items were combined. The question wording was tested during the pretest.
- b. You suggested adding a new item for "another school district." This was not requested by respondents during survey development. However, districts have the option of reporting this in item "a" as a group/consortium of districts, or in item "e" as other (specify).
- c. You suggested adding new questions about the structure and characteristics of area CTE centers. The survey sample and questionnaire are designed to collect national statistics on percentages of districts that offer CTE programs with various characteristics to their high school students. While districts are requested to report about programs that are provided to their students by other entities, such as area/regional CTE centers, the study is not designed to collect data about area/regional CTE centers that would be nationally representative. This type of information was not requested by OCTAE, the study sponsor. In addition, the suggested new questions request information that may not be easily available to survey respondents at the sampled districts. Therefore, the new questions would add respondent burden that would go beyond the scope of this Fast Response Survey, which includes three pages of items readily available to respondents and can be completed by most respondents in about 20 minutes.

Question #4: You suggested using the term "CTE programs of study" rather than "career pathways." As discussed above, OCTAE specifically requested the wording of this question, including the term "career pathways that align with related postsecondary programs" to meet their policy needs. The wording was tested with district respondents in the pretest.

Questions #5, 6, 7: You suggested adding questions to ask for the number of courses for each of these topic areas. These new questions would add significant response burden because they would require respondents to review all of their CTE courses to obtain these counts. This added burden would go beyond the scope of this Fast Response Survey, which includes three pages of items readily available to respondents and can be completed by most respondents in about 20 minutes. OCTAE does not need counts of numbers of courses to meet their policy needs.

Question #10:

- a. You suggested changing the wording of item “b.” Your suggestion to add the word “formal” to describe the CTE advisory council may narrow the focus beyond the intent. The current wording was tested with districts during survey development and the survey pretest and did not present any difficulty for respondents.
- b. You suggested adding the phrase “including externships” as an example to the end of item “m.” However, adding this to item “m” may cause respondents to focus on this one example and respond “no” because they do not have externships even when employers provide other types of training opportunities for CTE teachers, especially since there are no other examples given in this question. The current wording covers a broad range of training opportunities and has been tested with districts.

Question #11: You suggested consolidating items “d” and “e.” The NCES Quality Review Board requested the addition of item “e” to this question and the wording of both items has been tested with districts during the pretest.

Questions #13 / 14:

- a. You suggested rewording item “h” to incorporate other state agencies involved in CTE in addition to the state department of education. The current wording was tested during extensive survey development, including review by districts in 31 states. The current wording worked well and was clear to respondents.
- b. You suggested changing item “i” to incorporate the term “CTE programs of study.” As discussed above, OCTAE specifically requested the term “career pathways” to meet their policy needs. This wording was tested with district respondents in the pretest.

Question #15: You suggested deleting this question. During survey development, the situation addressed in this question was found to be very common in some states. These CTE districts may be a major provider of CTE in these states and therefore this information is needed to provide a complete picture of the CTE that is offered to public high school students across the country. Note that all districts are asked to answer this question, regardless of whether they answered “yes” or “no” to Question 1 on whether the district offers CTE programs to high school students. Question 15 is particularly important for districts that do not offer CTE programs themselves because it provides information on whether the students in the district’s enrollment area have the option of enrolling in a CTE district.

In summary, for the reasons stated above, we are not recommending any changes to the survey.

Thank you again for your input.