

**New York State Perkins V Plan
State Determined Performance Level Proposed Revisions**

Background

The Strengthening Career and Technical Education for the 21st Century Act, also known as Perkins V, required that states submit a plan to administer the grant covering the years 2020-2024. In accordance with Section 122(c)(2) of the new legislation, the New York State Plan, including proposed performance targets, was developed in consultation with the stakeholders. Performance indicators drive the use of funds inasmuch as they identify areas on which state and local recipients must focus their efforts and funding decisions. Targets are set by the state based on available data and recent performance levels and challenge subrecipients to improve outcomes for all students.

The law, however, provides an opportunity to request a revision of the targets based on unanticipated circumstances or changes related to improvements in data or measurement approaches. Section 113 gives states the option to request a revision the levels of performance in a submission of the state plan amendments (due in May 2021).

NYSED Office of Career and Technical Education’s Proposed Secondary Revisions

Accordingly, the New York State Education Department (NYSED) proposes to request a revision to the performance targets in two of the secondary performance indicators based on unanticipated circumstances and improvements in data approaches. NYSED is requesting an adjustment of the following two indicators as defined in the state’s plan:

Code	Indicator	Numerator	Denominator
3S1	Post-Program Placement	The number of CTE concentrators in the prior year’s four-year graduation cohort who, in the second quarter after exiting from secondary education, are in postsecondary education or advanced training, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed.	Total number of CTE concentrators in the prior year’s four-year graduation cohort.
5S3	Program Quality– Participated in Work-Based Learning	CTE concentrators in the most recent exiting graduation cohort who have participated in 54 hours of work-based learning and have graduated high school.	Total number of CTE concentrators in the most recent four-year graduation cohort who have graduated high school.

The levels of performance as approved of the United States Department of Education, Office of

Career, Technical, and Adult Education are as follows:

Secondary Indicators to be Adjusted	Baseline Performance Level	FY 2020	FY 2021	FY 2022	FY 2023
3S1: Post-Program Placement	97.35%	97.54%	97.74%	97.93%	98.12%
5S3: Program Quality: Work-based Learning	62.50%	64.09%	65.72%	67.38%	69.10%

Pursuant to Executive Order 202.4 from New York State Governor Andrew Cuomo, school districts, charter schools, and nonpublic schools were directed to close no later than Wednesday, March 18, 2020, as a result of the outbreak of the Novel Coronavirus (COVID-19) occurring in New York State. As the 2020-21 school year has progressed, LEAs have had to make frequent and often rapid adjustments in the manner that students having been attending school and receiving instruction. This includes schools that have yet to open for in-person instruction as of this writing. The direct result of the ongoing pandemic is that a large portion of our State’s student population has been receiving all or nearly all of their schooling remotely through virtual learning. The manner in which instruction has been delivered has varied greatly across districts and schools. The ongoing and at times rapidly worsening COVID-19 pandemic has also caused enormous economic and emotional insecurity for our students and their families and made the task of safely educating our students immensely more challenging. While all aspects of school operations have been impacted, career and technical education faces unique barriers to delivering programs that are able to attain prior expected performance goals.

Post-Program Placement

COVID-19 restrictions have generally limited the ability of students to complete technical skills assessments, especially industry certifications of value. NYSED expects this to negatively impact student prospects for securing competitive employment in an already difficult economic context.

As the original epicenter of the pandemic in the U.S., New York “suffered job losses during the depths of the pandemic were much more severe in the region than in the rest of the country, and remaining job shortfalls are quite a bit higher than nationally, particularly in New York City.”¹ As was true in much of the country, job losses were concentrated in the leisure and hospitality industry, though the retail and health sectors also experienced steep job losses.

The extent of economic damage to New York’s economy is significant. Although unemployment

¹ “Jaison R. Abel, Jason Bram, Richard Deitz, and Jonathan Hastings, [“The Regional Economy during the Pandemic.”](#) Federal Reserve Bank of New York Liberty Street Economics, December 2, 2020, accessed 2/2/2021.

has fallen from a high of 15.3% in April 2020 to 8.2% in December 2020², recovery to pre-pandemic levels of employment is not expected until 2023.³

In January 2021, the Federal Reserve Bank of New York and the New York State Department of Labor's analysis point to a drop in nonfarm payroll levels for the first time since April 2020. The unemployment rate for individuals with a high school diploma aged 18-19 in January 2021 was 16.6%.⁴ Given these conditions, it is likely that employment placements of CTE program concentrators will drop significantly.

It is expected that placement in post-secondary education and training will also be adversely impacted by the state's economy. While some recessions can promote enrollment in community colleges for re-skilling, the COVID-19 recession appears to be having the opposite effect. Enrollments in postsecondary programs at the two-year colleges in New York has declined by approximately 10%⁵ and disruptions caused by closings are not easily overcome in CTE programs which are often lab based and not duplicated by on-line instructional solutions. The enrollment of first year students enrolled in public two-year colleges dropped 18.9%⁶

Change in Measurement Approach Impacting the Majority of Placements Reported by Local District Programs

At the beginning of the 2020-2021 school year, NYSED became aware of a misapplication of data definitions for the 3S1-Post-program placement indicator. Districts responsible for reporting more than two-thirds of the CTE students in the state's yearly placement data were reporting on student plans after graduation, not an actual survey of program leavers six months after exiting. Once these concerns were identified, a plan was put in place to correct this reporting deficiency. The corrective action will be to survey program leavers and report outcomes of those responding to the survey. Staying on course has been made difficult during a year with limited staff capacity and restricted funding as a result of the COVID-19.

As a result of the convergence of unanticipated circumstances and changes in data reporting, NYSED expects the Post-Program Placement indicator outcomes to be significantly lower than in past years.

Work-Based Learning

The number of students able to participate in 54 hours of work-based learning has decreased

² U.S. Bureau of Labor Statistics, report on [Seasonally Adjusted Unemployment Rate, December 2020](#), accessed 1/29/21.

³ Office of the State Comptroller; Selected Economic Trends: [Executive Budget Projects Linger Economic Pain January 21, 2021 Edition](#), accessed 1/29/21.

⁴ U.S. Bureau of Labor Statistics, [Unemployment Rate - High School Graduates, No College, 18 to 19 years](#) [HSGS1819], retrieved from FRED, Federal Reserve Bank of St. Louis; 2/2/21.

⁵ Madeline St. Amour, ["Few Positives in Final Fall Enrollment,"](#) December 17, 2020, Inside Higher Ed, accessed 1/29/21.

⁶ National Student Clearinghouse Research Center's [Monthly Update on Higher Education Enrollment](#), November 12, 2020, accessed 1/29/21.

during times of school and business closures. While business re-openings have occurred regionally, few are willing to assume the risk an on-site work-based learning experience may entail. Additionally, inconsistent broadband access state-wide has resulted in regional disparities in the availability of on-line work-based learning experiences.

The Office of Career and Technical Education conducted a survey of CTE directors and work-based learning coordinators during the first two weeks in March 2021. Of the 244 responses, most reported greatly diminished capacity to provide work-based learning experiences. Just over 70 percent of respondents indicated students completed 25 percent or fewer hours than they normally do. Most respondents (approximately 82 percent) reported that some of their business partners were unable to provide WBL opportunities. Just over half of programs (57 percent) experienced a decrease in the number of participating worksites because businesses ceased operations. Of these, one-third reported that they did not believe they would be able to find alternate placements for their students. Taken together, these findings point to a significant diminution in local capacity to provide WBL opportunities.

Adjustment of Performance Levels in Light of Current Conditions

Placement: when misreported data is removed from the past three years of placement data, the average performance level would have resulted in a baseline of 94.01%. While we will not use this data to propose a revised baseline, we have used it as a reference in proposing our revised target levels. NYSED is requesting a downward adjustment of 15% to the 2020 performance target. This reflects both the actual decreases in first year enrollments at public two-year colleges and the high unemployment rates for high school graduates ages 18-19.

Work-based learning: the new targets are adjusted in consideration of the multiple constraints described above. School budget cuts combined with consequences of the economic downturn and changes in employer priorities will make it difficult to place students in quality experiences for at least 54 hours.

NYSED proposes to retain the same definitions and rate of improvement increments as appeared in the currently approved state plan. NYSED proposes the following targets for the Post-Program Placement and Work-based Learning Perkins V indicators:

Secondary Indicator	Baseline	FY 2020	FY 2021	FY 2022	FY 2023
3S1: Post-Program Placement	97.35%	79.21%	79.41%	79.61%	79.81%
5S3: Program Quality–Work-based Learning	62.5%	27.54%	30.08%	32.62%	35.16%

NYSED Office of Postsecondary Access, Support, & Success’s Proposed Postsecondary Revisions

There is growing evidence that the pandemic has impacted students and families in ways that influence enrollment, retention, completion, placement, and non-traditional participation at the postsecondary level.

According to a report produced by the independent, non-profit organization United Hospital Fund, “The magnitude of COVID-19’s impact is like nothing we’ve seen before and represents an unprecedented threat to children.”⁷ The report demonstrates the severity of emotional and financial distress that the public health crisis has caused and contextualizes how the environment is interconnected to education.

The COVID-19 pandemic has created a lack of financial stability, which in some households has meant college students are no longer able to afford their postsecondary education. We expect to see a resultant drop in all the Core Indicators of Performance at the postsecondary level.

The table below lists the three (3) Postsecondary Core Indicators of Performance by name and identifies their component parts used to measure statewide progress.

Code	Indicator	Numerator	Denominator
1P1	Postsecondary Retention and Placement	Number of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are placed or retained in employment.	Number of CTE concentrators who completed their program in the reporting year.
2P1	Earned Recognized Postsecondary Credential	Number of CTE concentrators who receive a recognized postsecondary credential during participation in or within one year of program completion.	Number of CTE concentrators who left postsecondary education in the prior reporting year.
3P1	Non-Traditional Program Enrollment	Number of CTE concentrators, <u>from underrepresented gender groups</u> , in career and technical education programs and programs of study that lead to non-traditional fields.	Number of CTE concentrators in a CTE program or program of study that leads to a nontraditional field, during the reporting year.

⁷ Suzanne C. Brundage and Kristina Ramos-Callen, “[COVID-19 Ripple Effect: The Impact of COVID-19 on Children in New York State](#),” United Hospital Fund, September 30, 2020.

Postsecondary Enrollment

Prior to the pandemic, higher education across the nation, and particularly at community colleges, experienced decreased student enrollment for consecutive years. Since the pandemic, research indicates "sharp declines at public two-year institutions (21% decrease)" and shows enrollment "falling at a rate almost 20 times higher than the prior year's decline."⁸

Between 2018 and 2020, New York State experienced a decrease in enrollment of approximately 14% of students in participating Perkins grant recipient institutions. It is likely that the pandemic will exacerbate this trend. Additionally, because of the amount of international and national travel to and through New York, the pandemic has hit New York State particularly hard. In fact, New York State ranks among the states with the most deaths (43,942 as of January 2021).⁹ Further, according to the November 2020 Congressional Research Services, New York State was among the five states with the highest unemployment rates.¹⁰

Beyond the new financial limitations many New York State families are experiencing as a result of COVID-19, several other factors may lead to declining postsecondary enrollment numbers. The National Conference of State Legislatures confirms how remote and hybrid learning on a national level have adversely impacted enrollment. They report that freshman enrollment in fall 2020 declined by an unprecedented 13.1%. This led to an overall postsecondary enrollment dip of 2.5% according to the most recent data from the National Student Clearinghouse.¹¹ Enrollment declines vary by institution, but public 2-year institutions have generally seen the largest declines in first-time student enrollment (-21.0%) followed by public colleges and universities (-8.1%).¹² Preliminary data from various institutions align with the findings that overall enrollment has notably decreased since the onset of the pandemic.

Postsecondary Retention and Completion

The pandemic is also expected to harm retention and completion rates. Preliminary data comparing Fall 2019 with Fall 2020 has shown a decrease in student retention and Pell-eligible enrollment at some two-year recipient institutions. A recent article in Inside Higher Ed states that "...20 percent of respondents report that COVID has influenced their ability to finish their program on time." Two-year colleges have been heavily impacted by COVID with students at these institutions often making plans to change their course loads. The authors assert, "15 percent [of students] plan to take more classes [and] 20 percent plan to take fewer classes" than their counterparts at four-year institutions or in graduate programs. They

⁸ Andrew Smalley, "[Higher Education Responses to Coronavirus \(COVID-19\)](#)," National Conference of State Legislatures, December 28, 2020.

⁹ Centers for Disease Control and Prevention, "[CDC COVID Data Tracker](#)," accessed March 3, 2021 at CDC COVID Data Tracker.

¹⁰ Gene Faulk et al., "[Unemployment Rates During the Covid-19 Pandemic: In Brief](#)," Congressional Research Service, January 12, 2021.

¹¹ National Student Clearinghouse Research Center, "[Term Enrollment Estimates](#)," accessed March 3, 2021 at Term Enrollment Estimates.

¹² Andrew Smalley, "[Higher Education Responses to Coronavirus \(COVID-19\)](#)," National Conference of State Legislatures, December 28, 2020.

continue: “The decision to enroll in fewer classes as a result of COVID may result in students from these groups taking longer to complete their programs.” Enrolling in more classes could also negatively impact grades and retention rates.¹³

Qualitative information gathered from grants officers and practitioners indicates that the change from in-person to largely virtual courses has resulted in many students taking Incomplete grades and/or failing classes they might otherwise have passed. Several Grant recipient institutions have shared data demonstrating decreases in grades from Spring 2020 to Fall 2020 in key programs. Dormitory closures at residential community colleges have forced students who were accustomed to living on campus to become at-home virtual learners, which may contribute to Incomplete and failing grades. From these firsthand accounts we can reasonably predict that more students leaving their community college dorms and taking up at-home virtual learning will negatively impact retention in community colleges.

Many current college students report already experiencing negative impacts in their academic performance, according to a survey from OneClass, an education technology company. A OneClass survey of over 14,000 freshmen focused on sophomore and junior students' fall 2020 experiences.¹⁴ The survey included students from 232 public and private colleges. The survey indicated approximately 85 percent of respondents reported that the pandemic had already negatively impacted their academic performance.¹⁵

Taken together, all of these changes to students' academic situations surely foretell hardships at present and ahead, which we will eventually see in reduced retention and completion rates.

Postsecondary Workforce Placement

We expect postsecondary workforce placements (CTE concentrators who participate in advanced training or are working in related fields, etc.) to be negatively impacted as a result of the pandemic as well. This will likely hamper aspirational target placement outcomes.

Information released by the New York State Comptroller's Office indicates that: “while the State has regained close to half of the 1.9 million jobs lost in March and April of 2020, a return to pre-pandemic employment levels is not expected until 2025.” It continues: “The COVID-19 pandemic's damaging effects on labor markets are still mounting and will be a major obstacle to a balanced economic recovery,”¹⁶ according to the Executive Budget Financial Plan. After a decline of 5.7 percent in 2020, U.S. employment is projected to increase by 2.7 percent in 2021 and reach its pre-pandemic level in early 2023, according to the New York State Division of Budget.

Moreover, according to the United States Bureau of Labor Statistics, New York State saw a

¹³ Morgan Polikoff et al., “[What's the Likely Impact of COVID-19 on Higher Ed?](#)” Inside Higher Ed, August 4, 2020.

¹⁴ One Class Blog, “[Did College Students Perform Worse During COVID-19?](#)” December 30, 2020.

¹⁵ Madeline St. Amour, “[Survey: Pandemic Negatively Affected Grades This Fall](#),” Inside Higher Ed, January 5, 2021.

¹⁶ Office of the New York State Comptroller, “[New York's Economy and Finances in the COVID-19 Era](#),” January 21, 2021.

massive increase in unemployment from December 2019 (774,274) to August 2020 (1,186,672). While the employment rates have somewhat improved since then, as of December 2020 the unemployment rate (744,274) was still more than double what it was in December 2019 (371,454).¹⁷ These statistics surrounding employment and placement opportunities depict an austere environment now and project future uncertainty in CTE fields.

Postsecondary Non-traditional Participation

The Non-traditional Program Enrollment indicator (3P1) measures students in CTE programs leading to non-traditional fields by gender as a percentage of the overall CTE student population. Preliminary data from recipient institutions show that some programs may be more susceptible to fluctuations in nontraditional enrollment. A key demographic within this group of students is women concentrating in traditionally male-dominated CTE fields. A New York Times article shows that the arrival of COVID-19 and the subsequent economic downturn have had a disproportionately negative impact on women's employment, housing, food security, childcare availability, and mental health. Nation-wide, approximately 865,000 women have dropped out of the labor force since the onset of the pandemic—a rate four-times that of men.¹⁸ Also, 32% of women ages 25-44 said the need to care for their children was the reason for their unemployment. With the loss of childcare, for many families the only option was for females who were gainfully employed to reduce their hours or quit their jobs. A Washington Post article states that “[o]ne out of four women who reported becoming unemployed during the pandemic said it was because of a lack of childcare—twice the rate among men.”¹⁹

When schools in New York State closed in March of 2020, many women became not only their children's primary caregivers but also their primary educators. The added responsibility of caring for their children around the clock and either teaching them or assisting them with virtual learning has left many women no choice but to decrease the amount of time they work.

The increased obligations many women now face, and the resulting decrease or elimination of employment and income, for some, will eliminate the option of attending community college. As women continue to disproportionately face the damage caused by the pandemic, it stands to reason that they will also disproportionately face obstacles to participate in nontraditional fields by gender at the postsecondary level. The number of women who pursue, persist and complete nontraditional programs by gender will therefore decrease at a higher rate than that of men, leading to a lower percentage of Non-Traditional Program Enrollment.

Conclusion for All Postsecondary Core Indicators

The data available from the inception of the pandemic to today, coupled with anecdotal information from grant officers, faculty, and students at New York State community colleges, show declines in enrollment, retention, completion, placement, and nontraditional

¹⁷ Bureau of Statistics, “[Local Area Unemployment Statistics-New York](#),” accessed March 2, 2021 at Local Area Unemployment Statistics - New York.

¹⁸ Jessica Grose, “[This Is A Primal Scream](#),” The New York Times, February 4, 2021.

¹⁹ Alicia Sasser Modestino, “[Coronavirus child-care crisis will set women back a generation](#),” The Washington Post, July 29, 2020.

participation for CTE students. All this unfortunate news portends significant and lasting struggles for college students. Accordingly, New York State requests reductions in all three (3) Core Indicators of Performance Targets.

Newly Proposed Postsecondary Core Indicator Target Reductions

New York State's postsecondary CTE Core Indicator Targets, as approved in our 4-Year State Plan, were as follows:

New York State Core Indicator Targets – Postsecondary – Approved in State Plan					
Core Indicator	Baseline	FY 2020	FY 2021	FY 2022	FY 2023
1P1: Postsecondary Retention and Placement	64.00%	64.50%	64.75%	65.00%	65.25%
2P1: Earned Recognized Postsecondary Credential	32.50%	33.00%	33.25%	33.50%	33.75%
3P1: Non-Traditional Program Enrollment	24.00%	24.50%	24.75%	25.00%	25.25%

We propose the following adjusted targets based on a combination of interactions with the field, documented statewide performance, and contemporary publications on the pandemic’s potential impact on core indicators.

New York State Core Indicator Targets – Postsecondary – Revised February 2021					
Core Indicator	Baseline	FY 2020	FY 2021	FY 2022	FY 2023
1P1: Postsecondary Retention and Placement	64.00%	49.25%	49.50%	49.75%	50.00%
2P1: Earned Recognized Postsecondary Credential	32.50%	20.25%	20.50%	20.75%	21.00%
3P1: Non-Traditional Program Enrollment	24.00%	16.25%	16.50%	16.75%	17.00%