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Mr. Mark Ren
Audit Director
Office of the State Comptroller
110 State Street
Albany, NY 12236

Dear Mr. Ren:

Pursuant to Section 170 of the Executive Law, the Commissioner of the New York State Education Department (NYSED) respectfully submits an overview of the steps that were taken to implement the recommendations contained within the Office of the State Comptroller's report "Oversight of Career and Technical Education Programs in New York State Schools, Report 2019-S-29" (OSC recommendations as found in the report are in italics).

1. *Ensure Approved and Local programs, as well as student enrollments, align with State workforce needs and meet the career goals of secondary school students.*

The NYSED does not have the authority to determine which programs local districts or BOCES should offer. Similarly, neither the state nor local education officials may dictate to students which courses or programs they must pursue to satisfy the elective credit graduation requirements. Elective course offerings are selected by students; state and local mandates do not govern these enrollments.

State Comptroller's Comment – While each school district determines the CTE programming for its students, as mentioned on page 6 of our audit report, the Department is charged with the general management and supervision of all public schools and educational work of the State, according to Education Law Title 1, Article 3, Part 1, Section 101. Furthermore, the Department designated itself as the administrative entity for secondary, post-secondary, and adult career and technical education as part of the Perkins Plan.

Approved programs are reviewed for alignment to academic and industry standards. In early 2021, NYSED developed [detailed resources](#) for programs seeking approval to ensure that industry-valued technical and professional skills are a part of all approved programs.

2. *Take the steps necessary to monitor CTE program-level performance as well as the accuracy and consistency of data submitted by school districts and BOCES.*

Changes in reporting rules have already improved reporting because BOCES became responsible for reporting enrollment and performance of NYSED-approved programs directly to the Student Information Repository System (SIRS).

Additionally, improved data reporting will be the outcome of a new CTE Detail Verification Report that was developed in collaboration with the Western New York Level 2 staff of the state's data warehouse and will be released in August 2021. This report is based on program-level data and will make visible performance disparities among programs offered within a school or BOCES. It will aggregate a range of academic and technical performance indicators to provide a clear view of CTE student outcomes.

3. *Assess whether the funding provided for CTE-related activities (e.g., program operations, tuition reimbursement, salary reimbursement) is sufficient to support high-quality CTE programs.*

The Office of CTE administers the Perkins V grant and provides technical assistance to the field. CTE content staff associates, all former teachers, support program development and provide instructional leadership in the CTE content areas of agriculture, family and consumer sciences, business and marketing, health sciences, trade and technical, and technology education. Assessment of state funding levels cannot be addressed by the Office of CTE. A meaningful assessment of CTE funding at the state level would require budget and data analysts with advanced knowledge of the complex existing funding formula and changes still required to address fiscal inequities in the foundation aid distribution that have yet to be implemented as a result of successful challenges to the state's formula for education funding.¹

State Comptroller's Comment – While the Office of CTE may not be able to address funding levels, the Department is charged with the general management and supervision of all public schools and educational work of the State and serves as the administrative entity for secondary, post-secondary, and adult career and technical education.

4. *Work with schools to ensure they are adequately promoting, supporting, and teaching CTE programs.*¹

In March 2021, the Office of CTE launched a [redesigned website](#) that includes many new resources for schools and instructors. Content developed to assist the CTE community is more comprehensive and detailed. Examples of newly added content are:

- tutorials on the program approval process,
- exemplar course sequences and employability profiles,

¹ See [Campaign](#) for Fiscal Equity, Inc. v. State, 86 N.Y.2d 307 (June 13, 1995) on the Legal Information Institute at Cornell Law School, accessed June 11, 2021.

- guidance on best practices in work-based learning, program design and content, integrated academics, and
- access and equity considerations in the provision of CTE programming to all student groups.

A contract for a [CTE Technical Assistance](#) center has been awarded to provide statewide support to the field, particularly to under-resourced districts.

5. *Review and update CTE regulations as necessary to ensure they align with Education Law and address current CTE needs in the State.*

NYSED CTE staff have reviewed Commissioner’s Regulations and developed reference materials for the field that clarify the regulatory foundation of CTE program approval process. (See the sample [resources](#) on integrated and specialized credit in CTE programs posted to the CTE website.) Updates to Commissioner’s Regulations impacting CTE are contingent on the outcomes of the New York State Board of Regents’ [Review of New York State Graduation Measures](#). This work was delayed by the COVID-19 pandemic.

6. *Work with schools and BOCES to standardize CTE curriculum and articulation agreements to ensure they benefit students and align with industry needs.*

As a state, New York does not interfere with the local authority to determine curricular content in secondary education. As the OSC report points out, New York State Education Law requires that the “board of education for each school district shall provide secondary school pupils and adults access to programs of career education.”² The NYSED does not endorse or approve standardized CTE curricula.

State Comptroller’s Comment – As previously noted, while each school district determines the CTE programming for its students, as mentioned on page 6 of our audit report, the Department is charged with the general management and supervision of all public schools and educational work of the State. Furthermore, the Department designated itself as the administrative entity for secondary, post-secondary, and adult career and technical education as part of the Perkins Plan. In addition, as noted on page 18 of our audit report, the Department indicated that it intends to explore standardized curriculums and regional articulation agreements in more depth. The Department references the lack of a common CTE curriculum in its own Perkins V Plan, stating that meetings with CTE organizations generally included requests for tools, content framework, or templates to standardize program delivery state-wide. Interviews with school districts and BOCES officials brought to our attention the concern that different standards may be required depending on where the student takes the CTE program and that the benefit realized by the student may differ as a result.

However, through the CTE program approval/reapproval process, the Office of CTE works with applicant schools and BOCES to confirm participation from industry representatives specific to the program’s content area to ensure alignment of the

² Office of State Comptroller; “Oversight of Career and Technical Education Programs in New York State Schools: State Education Department, Report 2019-S-29, p.11

program to industry expectations. Additionally, all Perkins grant recipients are required to conduct a biennial comprehensive local needs assessment (CLNA) which incorporates a review of local industry needs and requires recipients to determine which programs align to those needs and where improvements can be made.

Most importantly, through the provision of ongoing support to the CTE community, the Office of CTE works with CTE programs to offer students:

- goal-oriented planning through trade-specific knowledge and skills,
- strategies for improvement in academic and technical subjects,
- opportunities to continue their education at post-secondary institutions,
- opportunities to develop strong work ethics and build strong relationships with business and industry partners,
- a graduation pathway that meets New York State Regents standards,
- trade-specific knowledge and skills and lifelong employability skills, and
- exposure to real world employment experience through work-based learning activities and career exploration.

7. *Provide additional guidance to schools, school districts, and BOCES regarding the application of CTE program requirements to ensure there is clear and consistent process to record and report accurate CTE-related information.*

As mentioned above, comprehensive information is now available on the updated New York State Education Department's [CTE website](#). CTE associates meet weekly to review issues that are common to all content areas to promote consistent application of program approval standards.

The redesigned CTE Detail Verification Report will be available in August 2021 in time for the 2021-22 school year. The view of enrollment and performance data by program (with drill-downs available to student-level data) improves the range of information available for program providers to consider for program delivery and improvement. A report guide will be made available for users on the Office of Information and Reporting Services' website. Additionally, webinars and tutorials posted to the CTE website will support the field in the use of this new report.

Yours truly,



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