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STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

January 18, 2023

Betty A. Rosa, Ed.D.
Commissioner
State Education Department
State Education Building
89 Washington Avenue
Albany, NY 12234

Re: Oversight of Career and Technical
Education Programs in New York
State Schools
Report 2022-F-17

Dear Dr. Rosa:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law, we have followed up on the actions taken by officials of the State Education Department to implement the recommendations contained in our audit report, *Oversight of Career and Technical Education Programs in New York State Schools* (Report [2019-S-29](#)), issued December 21, 2020.

Background, Scope, and Objective

Career and technical education (CTE) programs (referred to in the past as vocational, occupational, or practical arts education) provide students with academic and technical skills, workplace competencies, and hands-on training over a short period of time to prepare them for future careers in occupational fields such as dental assisting, plumbing, electrical, cosmetology, culinary, and vehicle maintenance. High school students involved in CTE are more engaged and graduate at higher rates. According to a national non-profit entity that represents State CTE directors, the high school graduation rate for students who have completed two consecutive CTE courses in the same program is about 90% – 15 percentage points higher than the national average.

CTE can also address the needs of high-growth industries by helping to close skills gaps without the need for extensive post-secondary education. For example, half of all jobs in science, technology, engineering, and math industries require candidates with less than a bachelor's degree, while more than 80% of manufacturers report that talent shortages affect their ability to meet customer demand.

The New York State Board of Regents sets overall education policy for the State and selects the Commissioner for the State Education Department (Department), who is responsible for carrying out education policies in New York. 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.

The Department's CTE Office is responsible for overseeing the delivery of CTE education programs in the State's secondary school systems. The Department also contracts with a non-profit entity to provide a CTE Technical Assistance Center (TAC) to assist schools and Boards of Cooperative Educational Services (BOCES) with CTE. The TAC is responsible for expanding CTE across the State and provides comprehensive professional and leadership development and CTE guidance, including assistance with program administration, reporting, and other aspects of establishing and operating successful CTE programs.

CTE programs may be Department-approved (Approved programs) or may operate outside of the Department approval structure (Local programs). Approximately 179,000 New York State students graduate high school annually. Of those, approximately 31,000 participate in Approved programs, which results in about 27% receiving a CTE endorsement on their diploma. Endorsements demonstrate that students have met the academic and industry standards of the respective CTE program and can increase the likelihood of obtaining employment in the associated field of study.

Our initial audit report, covering the 2015-16 through 2018-19 school years and additional information through January 9, 2020, determined whether current Department CTE activities were sufficient to meet high-demand, high-growth, and high-salary job market needs; and what the Department, school districts, and BOCES could do to enhance CTE programs. Overall, we determined the Department did not provide adequate oversight of CTE programs offered through the secondary school system to ensure they align with student goals and the needs of the State labor market. In addition, we found students in CTE programs encountered several barriers to enrollment and the successful completion of the program.

The objective of our follow-up was to assess the extent of implementation, as of October 14, 2022, of the seven recommendations included in our initial audit report.

Summary Conclusions and Status of Audit Recommendations

Department officials made some progress in addressing the issues identified in the initial audit report. However, additional improvements are still needed. Of the initial report's seven audit recommendations, three were implemented, one was partially implemented, and three were not implemented.

Follow-Up Observations

Recommendation 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.

Status – Not Implemented

Agency Action – Department officials disagreed with this audit recommendation and have not taken action toward ensuring the Approved and Local programs and student enrollments align with State workforce needs or meet the career goals of secondary school students. Officials stated they do not have the authority to determine which programs local districts or BOCES should offer. Also, officials stated that neither State nor local education officials may dictate which courses or programs students 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.

However, as our original audit found, Department of Labor statistics indicated that 41% of Approved programs are providing students with skills for occupations that pay less than the State average and enrollment in certain CTE programs exceeds the number of open positions in the job market. While each school district determines the CTE programming for its students, the Department is charged with the general management and supervision of all public schools and the educational work of the State. Furthermore, the Department designated itself as the administrative entity for secondary, post-secondary, and adult career and technical education.

Recommendation 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.

Status – Implemented

Agency Action – The Department improved its data reporting process by implementing changes to the reporting rules. Under the new rules, BOCES became responsible for reporting enrollment and performance of Approved programs directly to the Department’s Student Information Repository System. Also, in August 2021, the Department updated its CTE Detail Verification Report based on program-level data, making performance disparities visible among programs offered within a school or BOCES. The report aggregates a range of academic and technical performance indicators to provide a clear view of CTE student outcomes. The updated reporting system provides both the CTE Office and those affiliated with the programs the opportunity to examine student performance within programs, particularly special populations, and make real-time modifications necessary to address disparities in performance.

Recommendation 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.

Status – Not Implemented

Agency Action – Department officials disagreed with this audit recommendation and have not taken steps toward the assessment of CTE-related funding levels. Department officials stated that the assessment of State funding levels cannot be addressed by the CTE Office, and 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 distributions that have yet to be implemented because of successful challenges to the State’s formula for education funding.

Recommendation 4

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

Status – Implemented

Agency Action – In March 2021, the Department launched a redesigned website that includes several new resources for schools and instructors designed to assist the CTE community. The website also now includes tutorials on the program approval process;

example course sequences and employability profiles; guidance on best practices in work-based learning, program design and content, and integrated academics; and access and equity considerations in the provision of CTE programming to all student groups. Additionally, a contract for a TAC was awarded to provide statewide support to local school districts and BOCES, particularly for under-resourced districts. The TAC provides support through outreach to CTE programs as well as statewide virtual professional development trainings and meetings.

Recommendation 5

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

Status – Partially Implemented

Agency Action – While Department officials agreed with this audit recommendation, they have only taken preliminary steps toward updating CTE regulations. Department officials stated that the CTE Office has reviewed the Commissioner’s Regulations and has developed reference materials that clarify the regulatory foundation of the CTE program approval process. However, updates to the 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, and this work has been delayed by the COVID-19 pandemic. In September 2022, the Board of Regents announced the Blue Ribbon Committee to review graduation requirements, but Department officials stated official regulation reviews are not scheduled to commence until at least January 2023.

Recommendation 6

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

Status – Not Implemented

Agency Action – Department officials disagreed with this audit recommendation. Officials stated they do not have the authority to standardize the CTE curriculum or articulation agreements (contracts between institutions that recognize credits toward a certification, apprenticeship, or college degree). The Department does not interfere with the local authority to determine curricular content in secondary education and does not endorse or approve standardized CTE curricula. However, through the CTE program approval/reapproval process, the CTE Office works with schools and BOCES to confirm participation from industry representatives specific to the program’s content area to ensure alignment of the program to industry needs. The CTE Office works with CTE programs to offer students an array of opportunities, including but not limited to goal-oriented planning through trade-specific knowledge and skills, strategies for improvement in academic and technical subjects, a graduation pathway that meets New York State Board of Regents standards, trade-specific knowledge and skills, and lifelong employability skills as well as exposure to real-world employment experience through work-based learning activities and career exploration.

Despite standard Department requirements and approval processes, CTE program course curriculum and articulation agreements with post-secondary programs are not developed using a centralized approach. Consequently, the process involves inefficient

and overlapping efforts and increased costs for both the CTE program provider and colleges. Further, there is no single CTE curriculum for comparable programs at different locations, and as a result, different standards may be required depending on the school district or BOCES where the student takes the CTE program.

Recommendation 7

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

Status – Implemented

Agency Action – The Department now includes comprehensive CTE-related information on its redesigned CTE website. CTE associates meet weekly to review issues that are common to all content areas to promote consistent application of program approval standards. Also, the updated CTE Detail Verification Report includes additional details to assist providers. Department officials stated the updated report allows views of enrollment and performance data by program and improves the range of information available for program providers to consider for program delivery and improvement. A report guide was also made available for users on the Department's Information and Reporting Services website, and webinars and tutorials are posted to the Department's CTE website to support using the redesigned report.

Major contributors to this report were Raymond Barnes, Danielle Rancy, and Jacqueline Keeys-Holston.

We would appreciate your response to this report within 30 days, indicating any actions planned to address the unresolved issues discussed in this report. We thank the management and staff of the Department for the courtesies and cooperation extended to our auditors during this follow-up.

Very truly yours,

Theresa Podagrosi
Audit Manager

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