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STATE OF MICHIGAN  
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY  
LANSING

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DIRECTOR

**OFFICIAL  
Policy Issuance (PI): 21- 31**

**Date:** October 27, 2021

**To:** Michigan Perkins Postsecondary Occupational Contacts  
Michigan Occupational Deans Administrative Council (MODAC)  
Michigan Community College Data and Evaluation Committee (MCCDEC)

**From:** Marcia Black-Watson, Division Administrator  
Industry Engagement **SIGNED**  
Workforce Development

**Subject:** Perkins Postsecondary 2021 Comprehensive Local Needs Assessment

**Programs  
Affected:** Perkins Postsecondary Career and Technical Education

**References:** **Public Law 115-224 Strengthening Career and Technical  
Education for the 21<sup>st</sup> Century Act**

**Rescissions:** None

**Background:** The Carl D. Perkins Career and Technical Education Program was established by the Community College Act of 1966. Perkins V: Strengthening Career and Technical Education for the 21st Century Act was signed into law on July 31, 2018 and became effective July 1, 2019.

The Michigan Department of Labor and Economic Opportunity, Workforce Development (LEO-WD) provides administrative oversight for the Perkins Postsecondary Career and Technical Education (CTE) Program, while the Michigan Department of Education, Office of Career and Technical Education administers the Secondary (K-12) Perkins Career and Technical Education Program.

The Perkins Postsecondary CTE Program is a partnership between the State of Michigan and community colleges and universities, offering two-year occupational degrees, including 28 community colleges, three (3) public universities and one (1) tribal college. The program provides resources and technical assistance to community colleges and universities receiving Carl D. Perkins Career and Technical Education annual awards in order to meet the occupational career goals of students and the workforce needs of industry.

Federal funds are allocated to states by the U.S. Department of Education to:

- Provide technical assistance to develop new occupational programs.
- Improve career guidance and counseling activities.
- Upgrade skills and competencies of occupational education faculty and staff.
- Improve accountability measures.
- Improve the transition of students between secondary, community colleges, four-year educational institutions, and the workplace.

Funding is provided to the Perkins V recipient institutions to improve career and technical education programs by supporting professional development, program improvement, curriculum development, evaluation/assessment, and support services.

**Policy:**

Under Perkins V Section 134(c): an eligible recipient shall:

- (A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and
- (B) not less than once every two (2) years, update such comprehensive local needs assessment.

In compliance with this requirement, LEO-WD requires Perkins V recipient institutions to complete all sections of the Perkins V Comprehensive Local Needs Assessment (CLNA) (Attachment A). CLNA requirements and legislative guidance is also provided (Attachment B). Institutions are required to submit the completed CLNA to LEO-WD at [LEO-MiCC@michigan.gov](mailto:LEO-MiCC@michigan.gov) no later than January 21, 2022.

Pursuant to Perkins V Section 123(b)(3) recipient institutions that fail to submit the completed CLNA by the above date will be considered not properly implementing the recipient's responsibilities under section 134 and will work with LEO-WD to implement program improvement activities.

Modifications

Recipient institutions may modify and update the CLNA at any time after submission. After modifications are made, an updated CLNA must be submitted to LEO-WD via email at [LEO-MiCC@michigan.gov](mailto:LEO-MiCC@michigan.gov). LEO-WD may require additional details or clarification of modifications.

**Action:**

Upon receipt of this Policy Issuance, recipient institutions may begin completing the attached CLNA. Completed needs assessments must be returned by January 21, 2022. All sections of the CLNA must be completed in their entirety prior to submission and are subject to review by LEO-WD.

**Inquiries:**

Questions regarding this policy should be directed to LEO-WD Perkins Postsecondary by email to: [LEO-MiCC@michigan.gov](mailto:LEO-MiCC@michigan.gov).

The information contained in this policy will be made available in an alternative format (large type, audio tape, etc.) upon request to this office. Please contact Ms. Anita Scott by telephone at 517-927-4356 or by email at [ScottA23@michigan.gov](mailto:ScottA23@michigan.gov) for details.

LEO-WD is funded by state and federal funds; more details are available on the Legal Disclaimer page at [www.michigan.gov/WDA](http://www.michigan.gov/WDA).

**Expiration Date:** Ongoing

MBW:NL:as

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**ATTACHMENT A: Perkins V Comprehensive Local Needs Assessment  
Fillable Form**

**Attached as a separated document**

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**PERKINS POSTSECONDARY**

**2021 COMPREHENSIVE LOCAL NEEDS ASSESSMENT  
REQUIREMENTS & LEGISLATIVE GUIDANCE**

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**PERKINS V LOCAL NEEDS ASSESSMENT LEGISLATION**

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**Source:** Perkins V Section 134(c)

(c) COMPREHENSIVE NEEDS ASSESSMENT. —

(1) IN GENERAL. — To be eligible to receive financial assistance under this part, an eligible recipient shall—

(A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection(a); and

(B) not less than once every 2 years, update such comprehensive local needs assessment.

(2) REQUIREMENTS. — The comprehensive local needs assessment described in paragraph (1) shall include each of the following:

(A) An evaluation of the performance of the students served by the eligible recipient with respect to State determined and local levels of performance established pursuant to section 113, including an evaluation of performance for special populations and each subgroup described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965.

(B) A description of how career and technical education programs offered by the eligible recipient are—

(i) sufficient in size, scope, and quality to meet the needs of all students served by the eligible recipient; and

(ii)(I) aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board described in section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111)(referred to in this section as the 'State board') or local workforce development board, including career pathways, where appropriate; or

(II) designed to meet local education or economic needs not identified by State boards or local workforce development boards.

(C) An evaluation of progress toward the implementation of career and technical education programs and programs of study.

(D) A description of how the eligible recipient will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions.

(E) A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including—

- (i) strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations;
- (ii) providing programs that are designed to enable special populations to meet the local levels of performance; and
- (iii) providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.

(d) CONSULTATION. —In conducting the comprehensive needs assessment under subsection (c), and developing the local application described in subsection(b), an eligible recipient shall involve a diverse body of stakeholders, including, at a minimum—

- (1) representatives of career and technical education programs in a local educational agency or educational service agency, including teachers, career guidance and academic counselors, principals and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals;
- (2) representatives of career and technical education programs at postsecondary educational institutions, including faculty and administrators;
- (3) representatives of the State board or local workforce development boards and a range of local or regional businesses or industries;
- (4) parents and students;
- (5) representatives of special populations;
- (6) representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at-risk youth (as defined in section 1432 of the Elementary and Secondary Education Act of 1965);
- (7) representatives of Indian Tribes and Tribal organizations in the State, where applicable; and
- (8) any other stakeholders that the eligible agency may require the eligible recipient to consult.

(e) CONTINUED CONSULTATION. – An eligible recipient receiving financial assistance under this part shall consult with stakeholders described in subsection(d) on an ongoing basis, as determined by the eligible agency. This may include consultation in order to—

- (1) provide input on annual updates to the comprehensive needs assessment required under subsection (c)(1)(B);
- (2) ensure programs of study are—
  - (A) responsive to community employment needs;
  - (B) aligned with employment priorities in the State, regional, tribal, or local economy identified by employers and the entities described in subsection(d), which may include in-demand industry sectors or occupations identified by the local workforce development board;
  - (C) informed by labor market information, including information provided under section 15(e)(2)(C) of the Wagner-Peyser Act (29 U.S.C. 491-2(e)(2)(C));

(D) designed to meet current, intermediate, or long-term labor market projections; and

(E) allow employer input, including input from industry or sector partnerships in the local area, where applicable, into the development and implementation of programs of study to ensure such programs of study align with skills required by local employment opportunities, including activities such as the identification of relevant standards, curriculum, industry-recognized credentials, and current technology and equipment;

(3) identify and encourage opportunities for work-based learning; and

(4) ensure funding under this part is used in a coordinated manner with other local resources.

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## **PROCESS, TIMELINE, AND PERKINS V CORE POSTSECONDARY PERFORMANCE INDICATORS**

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### **Process**

#### **1. Determine Local Goals**

In addition to any state goals and requirements that must be integrated into the needs assessment, consider local priorities that should shape the institution's work. For example, developing a process for program justification, increasing the number of students earning industry certifications, strengthening industry advisory board engagement or closing equity gaps are goals that could align with the needs assessment and the local application. If the institution has already established a strategic plan or "vision" for its local CTE programs and supports, it is important to use the needs assessment to further those goals. If the institution does not already have a set of strategic priorities, the needs assessment can help identify those for the future.

#### **2. Identify Stakeholders**

Consultation with "a diverse body of stakeholders" is at the heart of ensuring a rigorous and meaningful needs assessment process. The law names, at a minimum, the following participants who should engage in the initial needs assessment, local application development, and ongoing consultation:

- CTE program representatives at the secondary and postsecondary levels, including teachers, faculty, administrators, career guidance and advisement professionals, and other staff
- State or local workforce development board representatives
- Representatives from a range of local businesses and industries
- Parents and students
- Representatives of special populations
- Representatives from agencies serving at-risk, homeless, and out-of-school youth
- Representatives from Indian Tribes or Tribal organizations, where applicable

To identify stakeholders, start with individuals and organizations that the institution's programs already work with through industry advisory boards, sector partnerships, community groups, parent-teacher associations, and other structures. After identifying those already engaged in the institution's programs, the institution may need to reach out to new partners to fill gaps in expertise and ensure appropriate breadth and depth of representation among those impacted by CTE. For example, the local Chamber of Commerce, while a great partner, may not include full representation of industry sectors with labor market demand. This is an excellent opportunity to diversify the institution's partnerships and build a stronger career pathways system among education, workforce, and community leaders through sustained relationships.

### **3. Identify a Leadership Team**

In addition to identifying stakeholders, the institution will need to select a core leadership team to guide the needs assessment process and facilitate final decision-making. This leadership team will likely consist of CTE program administrators and other key local decision-makers. The team will look different based on the size and characteristics of the institution, but whomever is chosen should have in-depth knowledge of the institution's CTE programs.

### **4. Make a Plan for Seeking Feedback**

The law makes no requirements about how to organize and work with stakeholders. Institutions can use this flexibility to their advantage, within the requirements set by the state. For instance, institutions could broaden industry advisory boards to encompass all the above-named stakeholders or constitute a new group as a separate entity. Institutions could convene all the stakeholders regularly or meet with subsets of partners who have expertise for particular sections of the needs assessment. Using a combination of strategies, with at least some opportunities for stakeholders to engage with each other and hear diverse perspectives, is likely the best approach. In addition to meetings, institutions can also seek feedback through surveys, interviews, focus groups and listening sessions, in person or virtually—consultation does not have to be conducted entirely face-to-face.

As the institution considers how to gather feedback, inventory existing mechanisms and consider how to build on them. For example, does the institution already survey students? If so, could the institution add additional questions relevant to the needs assessment to that survey? Does a representative of the institution already participate in monthly Chamber of Commerce meetings, and could the institution be added to the agenda one month to dialogue with community leaders on specific issues relevant to the institution's needs assessment? The sooner the institution identifies possible information collection opportunities that fit seamlessly with existing work, the easier and more effective the process will be.

After identifying existing mechanisms, look for gaps in that outreach and consider ways to gather input from stakeholders who may not already be part of current activities. The institution also needs to think about ensuring a continual feedback loop with key stakeholder groups to meet ongoing consultation requirements. To keep partners motivated, regularly show them the results of their input, and publicly recognize their contributions.

### **5. Gather and Develop Materials (Include the last three years when using historical data)**

The institution can begin to build the evidence base for its assessment by compiling already-available sources of regional, state and local information and by developing plans to collect new data. Data of use to the needs assessment process can come from internal sources, such as student performance data, student survey findings and feedback from local industry advisory boards, or from external sources, including state labor market information (LMI) and results of state or third-party evaluations of the institution's programs. Ensure that the institution is collecting information from a variety of sources using quantitative and qualitative methods, so that cross-validation is available for what the institution learns from one methodology or information source with what is gleaned from another source or method of data collection (this is known as "triangulation").

Data collection methods of particular use for needs assessments include surveys, focus groups and listening sessions. Findings from surveys and transcripts from focus groups and listening sessions can be used, in turn, to spark further discussion among stakeholders.

### **Timeline**

Send completed form to [LEO-MiCC@michigan.gov](mailto:LEO-MiCC@michigan.gov) with any supporting documentation by January 21, 2022.



## **Perkins V Core Postsecondary Performance Indicators**

### **1P1: Postsecondary Retention and Placement**

The percentage 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.

### **2P1: Earned Recognized Postsecondary Credential**

The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion. postsecondary CTE Concentrator Definition:

At the postsecondary level, a student enrolled in an eligible recipient who has –(i) earned at least 12 credits within a career and technical education program or program of study; or (ii) completed such a program if the program encompasses fewer than 12 credit or the equivalent in total.

### **3P1: Non-traditional Program Enrollment**

The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.

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## **PROGRAM SIZE, SCOPE, AND QUALITY DEFINITIONS**

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### **Size:**

Career and Technical Education (CTE) Programs of Study (POS) must be of comparable size, based upon enrollment, as compared to enrollment in non-CTE programs and total college enrollment. A program of study provides students an opportunity, via a non-duplicative sequence of academic and technical courses, to become a CTE concentrator. A concentrator is a postsecondary student who completes at least twelve credits of the academic and/or technical hours in a program of study; or completed a CTE program with fewer than 12 credits.

### **Scope:**

The scope of a Program of Study is defined through curriculum guidelines allowing students to gain a strong experience in and comprehensive understanding of all aspects of the industry, which prepare students to enter, including:

- occupations and careers that comprise an industry, from basic to advanced.
- principles of technology, labor and community issues, health and safety and environmental issues related to the industry.
- knowledge of the planning, management, finances, technical and production skills for the industry related to the program.
- developing problem-solving skills and includes applied academics in the context of the student's career pathway selection.

CTE programs should include classroom and laboratory experiences and work-based instruction where appropriate. Instruction must be competency-based with either state or national curriculum or, when such curriculum does not exist, locally developed curriculum.

CTE programs and POS must include linkages between secondary and postsecondary CTE programs with evidence of operational agreements between secondary and postsecondary institutions. This may include, but not limited to, articulation agreements, transitional curriculum, and dual credit.

**Quality:**

Eligible recipients offer students the opportunity to participate in *High Quality Programs of Study* that lead to two of the following three components:

high-skill, high-wage, in-demand occupations.

Michigan defines a *high-wage* career as one with an average hourly rate equal to or greater than the average hourly rate of all occupations as reported by the 2020 Occupational Employment and Wages Statistics program. The FY20 average hourly rate in Michigan is \$19.67 and an annual income of \$40,920 according to the Michigan Bureau of Labor Market Information and Strategic Initiatives.

An *in-demand* industry is defined as an occupation in which state, local, or regional labor market data show that demand exceeds projected employment supply.

*High-skill* occupations require an industry-recognized certificate, credential, postsecondary training, apprenticeship, or degree.

- Courses include rigorous, coherent CTE content aligned with challenging academic standards.
- Eligible recipient's POS must offer students the opportunity to earn a postsecondary level industry certification and/or licensure or an associate or bachelor's degree.
- Postsecondary eligible recipients should ensure that academics are an integral component of all Perkins-funded CTE programs.

Application reviews, onsite monitoring, CTE Program Approval and Program Review as well as enrollment and follow-up results are measures of quality in addition to those requirements of the Perkins Act. These activities provide valuable data regarding the quality of programs and services.