

Career and Technical Education (CTE) Audit Rule Development Workshop

Proposed Rule 6A-10.0342, Florida Administrative Code, Career and Technical Education Program Performance Reporting and Audit Review

Division of Career and Adult Education, Florida Department of Education

January 21, 2022



Agenda

- Statutory requirement
- Goals of Rule 6A-10.0342, Florida Administrative Code (F.A.C.)
- Implications of House Bill (HB) 1507
- Proposed processes to review programs
- Next Steps
- CTE Audit Update

Workshop Goals

- Provide CTE audit rule development status update.
- Receive input on proposed rule development processes.
- Establish rule transparency.
- Provide a platform for communication.

Statutory Requirement and Rule Goals

Rule 6A-10.0342, F.A.C., Career and Technical Education Program Performance Reporting and Audit Review



Statutory Basis for Rule Development

- The CTE audit is found in section (s.) 1003.491(5), Florida Statutes (F.S.).
- House Bill 1507 created changes to s. 1003.491(5), F.S., including specifying the State Board of Education's rulemaking authority.
- The statute now requires, “The department shall adopt rules to administer this section.”

Rule Goals

- Ensure Florida's CTE programs are tightly aligned to economic demand.
- Ensure CTE programs are not under-performing.
- *Align* CTE audit program evaluation with the Framework of Quality found in s. 445.004, F.S.
- *Align* program offerings with programs on the Master Credentials List found in s. 445.004, F.S.
- Develop process to assess if there is local program duplication within a given geographic area.
- Develop process to make recommendations for programs that do not exist locally but are in demand.

Implications of House Bill 1507

Rule 6A-10.0342, F.A.C., Career and Technical Education Program Performance Reporting and Audit Review



House Bill 1507: Reimagining Education and Career Help Act

Section 1003.491(5), F.S., now states:

(c) Using the findings from the annual review required in paragraphs (a) and (b), the commissioner shall phase out career and technical education offerings that are not aligned with the framework of quality, do not meet labor market demand under s. 445.004(4), do not meet institutional performance, or are unwarranted program duplications. The commissioner shall encourage school districts and Florida College System institutions to offer programs that are not offered currently.

Current CTE Audit Labor Market Demand

- Currently, in the first phase of analysis of the CTE audit, a local CTE program meets the market demand requirements if the primary SOC (Standard Occupational Classification) code aligned with the program meets at least one of the following are met:
 1. Statewide demand occupation list (DOL)
 2. Regional DOL (for corresponding region)
 3. Middle-high wages (Statewide threshold, as indicated on the Statewide DOL)
 4. Middle-high wages (Regional threshold, as indicated on corresponding Regional DOL)
 5. High growth (Statewide threshold)
 1. 1.26% growth rate and 500 annual openings; or
 2. Any positive growth and 1,200 annual openings.
 6. High growth (Regional threshold)
 1. Any positive growth rate % growth and either 38 or 80 annual openings (for small and large regions, respectively).

Current CTE Audit Labor Market Demand

- Currently, in the second phase of analysis of the CTE audit, a local CTE program met the market demand requirements if the SOC code listed on the Comprehensive Local Needs Assessment (CLNA) Labor Market Alignment (LMA) met the Perkins V criteria for LMA. In addition to what is assessed in the first phase of the CTE audit, this phase 2 also included:
 - Secondary SOC codes for Statewide and Regional DOLs
 - SOC code alignment for CareerSource Board Targeted Occupation or Sector List
 - Agriculture related programs
 - Enterprise Florida Targeted Industry Sector
 - Two of the following sources:
 - Job analytics Resources for the region
 - Local CareerSource Board letter of support
 - Economic development agency letter of support
 - Local Chamber of Commerce letter of support
 - Other Employer or Industry Association letter of support

Processes That May Result from CTE Audit Rule

1. For local programs that repeatedly show underperformance of institutional performance metrics (i.e., retention/completion, “success,” graduates employed or continuing their education, employed graduates’ earnings), have institutions develop program improvement plans to continue offering these programs. For local programs that continue to show underperformance of institutional performance metrics, even with program improvement plans in place, aim to remove these programs.
2. For local programs that repeatedly (more than one year) do not show any labor market demand, aim to remove these programs.
3. For moving towards local program removal in the CTE audit, determinations must be made on what components of the Framework of Quality are required, recommended or not appropriate measures / thresholds of market demand.

Additional Guidance Connected to CTE Audit Rule

1. Now, s. 1003.491(5), F.S., explicitly states the CTE audit **shall include "evaluation of the federal Comprehensive Local Needs Assessments, to assist in the review of programs."**
2. Market demand for the Framework of Quality as described in s. 445.004(4), F.S. is similar to the existing "high growth" metric in the CTE audit.
3. Market Demand for the Framework of Quality as described in s. 445.004(4), F.S. also includes, "or **meets local demand as identified in the criteria adopted by the Credentials Review Committee.**"

Credentials Review Committee

- The Credentials Review Committee (CRC) was established through HB 1507.
- Tasked with various duties, including developing a Framework of Quality that includes new measures of market demand using data from the Labor Market Estimating Conference (LMEC) produced by the Florida Legislature's Office of Economic and Demographic Research (EDR).
- Programs of study that meet the Framework of Quality (and new market demand measures) will appear on the Master Credentials List.
- The Master Credentials List will be used as a basis for performance-based funding to incentive offering some programs.

Evaluating Programs through the CTE Audit

1. Continue to assess Institutional Program Performance using existing CTE audit methodology, e.g., for postsecondary: (1) retention/completion, (2) “success,” (3) graduates employed or continuing their education, (4) employed graduates’ earnings.
2. Continue to assess Labor Market Demand (using the existing CTE audit methodology).
3. When available, supplement the CTE Audit Labor Market Demand analyses with those developed as part of the Framework of Quality established by CRC under s. 445.004(4), F.S.

Discussion and Feedback (Q&A)

- Based on what has been presented so far, what questions are there?
- Not including CTE audit reporting, how often do you currently review program to market demand alignment locally?
- What are your thoughts on continuing to use the CLNA LMA's as the second phase of local labor market demand assessment in the CTE audit?
- Are there any CLNA LMA criteria that you **do not** find appropriate as indicators of market demand for the CTE audit?
- What are some of the effective practices used to track local demand and/or program alignment?

CTE Audit Mechanisms Not Currently in Place

1. "Aligned with the framework of quality" and "Labor market demand under s. 445.004(4)"
 1. The ability to do so depends on the outcomes of the Credentials Review Committee. Considerations must be made as to how these will replace and/or supplement some/all of the current CTE audit market demand measures.
2. "Unwarranted program duplications"
 1. The Education Meets Opportunity (EMOP) tool will allow us to visualize and assess this, recognizing that programs are intended to serve local populations.
3. "Recommendations for programs that are not offered currently"
 1. The LMEC analyses and EMOP tool will allow us to identify programs that we are not currently offering but should consider because there is labor market demand.

Proposed Processes to Review Programs

Rule 6A-10.0342, F.A.C., Career
and Technical Education Program
Performance Reporting and Audit Review



Considerations for Review of Institutional Program Performance in the CTE Audit

- Iterative process.
- Recognition that a single data point does not indicate an "under-performing program."
- Multiple years of data to show a trend.

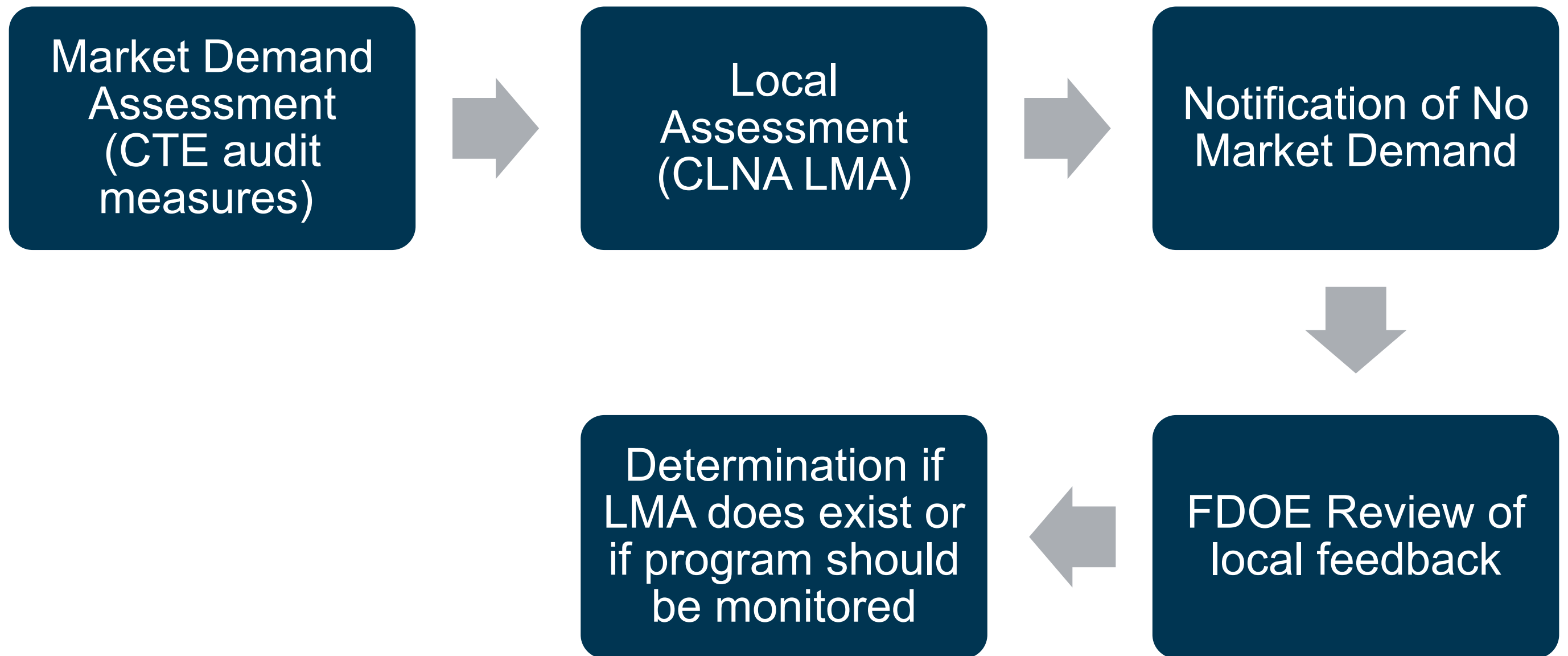
Discussion and Feedback (Q&A)

- How do you currently monitor program improvement and removal?
- Are there data not assessed by the FDOE available locally to help us better understand local performance?
- Would it be helpful for the FDOE to provide program improvement plan structures/templates?
- What other imperative information should we know as we design a process for determining when program "improvement" requirements should occur?

Considerations for Review of Labor Market Demand in the CTE Audit

- Review of multiple facets of labor market demand—not a single definition.
- Recognition that a single year of data does not indicate a program is not or will not be in demand.

Program Review Process Example



Discussion and Feedback (Q&A)

- Questions?
- If your program is recommended for phasing out and you disagree with the decision, what would like the appeals process to consider?

Next Steps

Rule 6A-10.0342, F.A.C.,
Career and Technical Education
Program Performance Reporting and Audit Review

Resources

- For more information on please visit these websites:
 - [Credentials Review Committee](#)
 - [House Bill 1507](#)
 - [Section 1003.491\(5\), F.S.](#)
 - [CTE Audit](#)
- For CTE Audit Methodology, we are finalizing a FAQ document and technical specifications documents

Public Comment



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