



January 25, 2021

Agency Rules Coordinator
Illinois State Board of Education
100 North First Street
Springfield, IL 62777

Re: Education Systems Center Comments on Proposed Revisions to Part 256 Rules

Dear Agency Rules Coordinator,

We appreciate the opportunity to review and provide input into the [proposed rules for Career and Technical Education](#) (Part 256). As an organization, Education Systems Center at Northern Illinois University (EdSystems) has been deeply involved in the development of both the State Perkins Plan and aligned policy and supports including the Postsecondary and Workforce Readiness (PWR) Act and the College and Career Readiness Indicator of the State's Every Student Succeeds Act Plan.

Our comments that follow are intended to support ISBE in its efforts to ensure alignment to existing policy frameworks and that implementation embodies the spirit and intent of the articulated State Plan components. We have organized our comments by relevant section. Several themes carry throughout our comments: a desire to strengthen a focus on equity, deepening alignment to existing policy frameworks, and ensuring that the rules support CTE programming that meets the ambitious Quality Criteria outlined in the State Plan. We look forward to continuing to work in close collaboration with ISBE and communities across Illinois as these plans roll out.

Thank you for the opportunity to contribute feedback on these proposed rules for CTE, and we look forward to our continued collaboration with ISBE on the implementation of CTE in Illinois.

Sincerely,

Jonathan Furr
Executive Director
Education Systems Center at Northern Illinois University

Education Systems Center Comments on Proposed Revisions to Part 256 Rules January 2021

Section 256.100 Purpose and Scope

256.100(a)(5)

The State's first listed goal under the [State Perkins Plan](#) is "Equity as a Foundational Tenet" (p.18). As currently written, Section 256.100 needs stronger language that alludes to equity [(a)(5) Provide targeted supports to students who have a broad range of backgrounds and skills]. We recommend that this be modified to read, "Identify equity gaps in CTE access and outcomes across groups and provide targeted supports with a focus on meeting the needs for members of special populations to close those gaps."

256.100(b)(1)

In alignment with [State Perkins Plan](#) Goal 1 (p.19), this should read "developing challenging academic and technical standards and assisting students in meeting the Illinois Learning Standards, including preparation for high-skill, high-wage, *and* in-demand occupations in current or emerging professions".

Section 256.111 Definitions

As noted in the [State Perkins Plan](#) (VII.b.1; p.62), common definitions and frameworks are essential for clear communication and collaboration within Perkins and related efforts. The definitions in Section 256.111, which carry forward throughout the proposed rules, include definitions and implementation guidance that are not aligned to the State's existing work-based learning definitions as defined in statute and policy, including the 2016 Postsecondary and Workforce Readiness Act, the 2018 Illinois [Career Pathways Dictionary](#), and the Every Student Succeeds Act State Plan, and the [State Perkins Plan](#).

"Career and Technical Education Programming" or "CTE Programming"

The reference to "remedial programs" in the listing of instructional components should be broadened to include transitional instruction, as follows: "remedial programs *and transitional instruction* that are designed to enable individuals to benefit from..."

"Career Clusters"

This section should include reference to the Endorsement Areas as defined in the PWR Act (see here for a [crosswalk](#) of Career Clusters to Endorsement Areas). The addition could be at the end, as such "...which is a State-approved framework of career clusters that is informed by Advance CTE's framework of career clusters and aligned to the Endorsement Areas of the Postsecondary and Workforce Readiness Act." Throughout Part 256, references to Career Clusters should be reviewed to determine if the broader Endorsement Areas would be more appropriate (for example, with respect to middle school career awareness and exploration).

“Essential Skills”

This should be renamed “Essential Employability Skills” in alignment with the original [State Perkins Plan](#) (p.62) and as referred to elsewhere in the proposed rules. The definition, as articulated in PWR and the [Career Pathways Dictionary](#), is “Essential employability competencies, often connected to employability skills or “soft” skills, are workplace dispositions and attitudes connected to often-performed work tasks and behaviors. Applicable across many industries, employability competencies include the ability to connect industry knowledge to one’s personal efficacy in the workplace.”

“High-Wage Occupation”

In alignment with work to define model Programs of Study [by other State agencies](#), we suggest the following definitions: “Using Department of Labor data and the MIT Living Wage Calculator, a high wage occupation is one whose median salary is at least 85% of the statewide living wage for one adult and one child.

“High-Skill”

As currently written, this definition is vague and may cause confusion in the field. The following proposal would provide greater clarity for the field and aligns with workforce development efforts and WIOA: “refers to an occupation that requires specialized skills or knowledge *either through postsecondary education or expertise levels attained through long-term on-the-job training.*”

“Local or Regional Advisory Committee”

This definition currently lacks the rigor as outlined in Quality Criterion #1 of the [State Perkins Plan](#) (p.26). We suggest that it be revised to read: “...refers to a group of stakeholders that *includes, at a minimum, local business or industry, university and community college representatives, local workforce board, adult education providers, community-based organizations, CTE faculty, and CTE staff.*”

“Work-Based Learning”

The current definition for Work-Based Learning does not align with the adopted work-based learning continuum and definitions of the [Career Pathways Dictionary](#), which are affirmed in the Work-Based Learning section (pp.39-40) of the [State Perkins Plan](#) as well as Quality Criterion #6 (p.27).

Integrating the existing definition with the nuance of the CTE rules: “*Work-based learning provides participants with work based opportunities to practice and enhance the skills and knowledge gained in their program of study or industry training program, as well as to develop essential employability skills, and includes an assessment and recognition of acquired knowledge and skills. A continuum of work-based learning experiences should include, at a minimum: team-based challenges and/or CTSOs, as well as one or more of the following, at both the secondary and postsecondary levels: internships, career-related service learning, paid work experience, on-the-job training, incumbent worker training, transitional jobs,*

apprenticeships (i.e., youth, pre-, registered, non-registered, research), student-led enterprise, remote work for a client/employer, school-based enterprise, cooperative work agreement or clinical experience. These experiences should be integrated into the CTE curriculum.”

“Workplace Learning”

This term will likely cause confusion in the field due to its linguistic similarity to “Work-Based Learning.” If it is intended to signify cooperative work agreement models, we suggest that ISBE use that term so as to not cause confusion around other types of robust work-based learning such as Career Development Experiences.

Additions: “Career Exploration” and “Team-based Challenge”

In alignment with the PWR Act and references further in Part 256, we suggest adding the following two definitions:

“Career Exploration” means an activity such as a job shadow, attendance at a career exposition, or employer site visit providing an individual with the ability to engage directly with employers, for the purpose of gaining knowledge of one or more industry sectors or occupations.

“Team-based Challenge” means a group problem-based learning project relating to an individual’s career area of interest that involves a problem relating to employers within that area, including mentoring from adults with expertise in that area, and requires the individual to present the outcomes of the project.

Section 256.113 Local Uses of Funds

(c)(3)

In alignment with Perkins Plan Goal 1 (p.19), this should read “...in high-skill, high-wage, and in-demand industry sectors or occupations.”

(c)(5)

Part 256 must ensure that the quality criteria in the Perkins State Plan are infused across all the rule’s expectations for CTEPs. We suggest addressing that goal in this Section by adding “...that result in increasing student achievement on performance indicators *and meet quality criteria defined in the Perkins State Plan.*”

Section 256.160 Career and Technical Education Programs

(c)

CTE programming at the secondary level must always prepare students for advanced education and immediate employment. As currently written, it is implied that students would lead to a bifurcated commencement of full time OR postsecondary education. The CTE program structure itself should not limit student aspirations to pursue postsecondary training that builds on their existing secondary coursework. We suggest revising to read: "... necessary to prepare the student for *both* immediate employment *and* advanced education in preparation for later employment."

(d)

This currently omits reference to post-secondary education entities. We suggest revising to read: "...by a public or private employer, by a private CTE training institution, *by a community college, by other public or private institutions of higher education, or by another institution capable of carrying out CTE programs and services.*"

Section 256.161 College and Career Guidance

This section should incorporate the Postsecondary and Career Expectations ([PaCE](#)) Framework of the PWR Act, which has been adopted by ISBE and other state agencies, and is referenced on p. 60 of the State Plan. We suggest revising the first sentence as read: "... in association with the CTEP *and in alignment with the State of Illinois Postsecondary and Career Expectations framework* to assist ..."

(d)

In alignment with definitional feedback, we suggest greater emphasis on career exploration and clarity on work-based learning. We suggest revising to read: "connect students to *work-based learning experiences, including Career Exploration Activities and Career Development Experiences*, to deepen understandings and explore career interests to include providing placement services for students seeking immediate employment, planning advanced education in preparation for later employment, etc.;"

Section 256.162 Additional Program Components for Elementary Career Exploration Programs

(a)(2)

To support the broader aims of career exploration by students, this should be revised to read "have an occupational information program that is aligned with *at least one* State Board-designated program of study or career cluster..."

(b)(1)

As above, this should be revised to read: "...be aligned to *the State of Illinois Postsecondary and Career Expectations Framework and at least one State Board-designated program of study or career cluster;*"

(b)(2)

As described in our feedback on Section 256.111 and in alignment with the PWR Act, this should be revised as such: "integrate instruction on *Essential Employability Skills*"

Section 256.163 Additional Program Components for Family and Consumer Sciences Programs

ISBE should ensure FACS offerings have concrete connection to career areas and essential employability skills. Not doing so could produce potential equity issues in which students would not be adequately prepared for college and career, hampering the quality of their CTE experience and outcomes. While we read paragraph (a)(1) to require this connection, it can be reinforced by revising it to read: "be administered as part of a State-approved CTE program of study *within a career cluster.*"

Section 256.165: Additional Program Components for Workplace Learning Programs

As referenced in sections above, "Workplace Learning" as a term will produce confusion in the field. As this appears to describe a cooperative work agreement model, language should be clarified.

(a)(1)

Revise to include: "include a practicum work experience component with direct workplace experience *related to the student's Program of Study and career goals*"

(a)(2)

Ensure the technical and essential employability skills mentioned here reference the existing frameworks referenced in our suggestions on definitions.

(b)(3)

With current technology and the increasing shift to flexible instructional models, we wonder if it is necessary to require a synchronous meeting among all students once per week? Suggested revision: "must include at least one meeting per week (*asynchronous or synchronous as locally determined*) of students in similar career pathways..."

Section 256.220 Personnel Qualifications

This Section should be re-written to ensure that it does not restrict qualified individuals to support programs of study in the Education and Training Career Cluster. The following revisions to (a) will address these goals:

All professional personnel, with administrative or supervisory assignments in CTEPs funded by the State Board, in educational agencies or institutions other than the public schools of Illinois, shall have experienced:

- 1) *For CTEPs in career clusters other than Education and Training, one year (2,000 hours) of employment outside of education in an occupation other than teaching or counseling and two-years experience in CTE as an administrator, supervisor, or teacher;*
- 2) *For CTEPs in the career cluster of Education and Training, one year (2,000 hours) of employment in a related occupation and two-years experience as an administrator, supervisor, or teacher; or*
- 3) Comparable experience in education, business, or industry.

This section should also include a provision that *“any individual qualified as a community college instructor for college-level courses aligned to the CTEP Program of Study shall, on the basis of the community college’s qualification, also meet all State Board qualifications under this Part.”* This better aligns with the spirit of the State Perkins Plan, which emphasizes increased access to quality programs of study and dual credit and dual enrollment courses.

Section 256.231 Additional Program Components for the Development of New Area Career Centers

(a),(d)

The process for establishing a new area career center needs to include an assessment as to why the program cannot be feasibly offered through one or more area community colleges, with the strong presumption being that regional programs should be coordinated through the area community college. The submission requirements in (a) should require the proposal to assess why the program cannot be feasibly offered through area community colleges. In addition, the criteria for approval in (d) should include evidence that the program needs cannot be feasibly offered through area community colleges. This can be added as an additional sub-bullet.

Section 256.310 Eligible Applicants, Allocations, and Application for Funding

Each CTSO funded by ISBE should be expected to offer both career exploration activities and team-based challenges, as defined in the [Career Pathways Dictionary](#) and Goal 6 (Work-Based Learning) of the Perkins Plan.

Section 256.330 Terms of the Grant

(a) – Add an item (4)

Annual reporting from CTSOs on Career Exploration and Team-Based Challenges or other activities should include reporting on participation and outcomes by demographic subgroups of students.

Section 256.450 Career and Technical Education Programs for Innovation

As outlined in the approved [Perkins Plan](#) (p. 83), the State has indicated that a core intention of Perkins Reserve Funds is to “[address] gaps and disparities in CTE access and programming for students. ISBE will develop a grant for LEAs to support program innovation or expansion in alignment with the quality criteria and common definitions and frameworks emphasized in this plan, such as the PWR Act.” Section 256.450, as currently written, fails to make any mention of equity as a focus for innovation in CTE, or of the frameworks within the PWR Act.

(a)

Recommended revision: “foster innovation through the identification and promotion of promising and proven CTEP practices and strategies *to close equity gaps across student subgroups*, which may include programs, practices and strategies that prepare individuals for nontraditional fields; or”

(b)

Recommended revision: “promote the development, implementation and adoption of programs of study or career pathways aligned to *frameworks identified in the State Plan, including the Postsecondary and Workforce Readiness Act*, and State-identified high skill, high-wage, *and* in-demand occupations or industries.”