

FY22 Program Improvement Plans:

Perkins Policy and Guidance





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GUIDELINES FOR COMPLETION OF FY22 PROGRAM IMPROVEMENT PLANS

Secondary Perkins V-Eligible Recipients

The Perkins V statute requires eligible recipients to achieve at least 90% of their performance target for each core indicator. In the event a recipient does not achieve at least 90% of the target, they are required to enter into a Program Improvement Plan (“PIP”) in the year following the year for every indicator for which the recipient failed to meet the level of performance. Further, each PIP must include an analysis of the performance disparities or gaps between special populations and subgroups, and actions that will be taken to address such gaps in consultation with stakeholders [Sec 123(b)(2)].

FY22 Program Improvement Plans must be completed in the appropriate fillable PDF (for Year 1 or Year 2, as indicated) and emailed back to the district’s assigned Administrative Field Services consultant (letter signator) by close of business, **Monday, April 17, 2023**.

The following steps must be taken to complete a Program Improvement Plan.

1. **Please review the PIP notification letter dated March 8, 2023.** The letter indicates which federal performance indicator(s) were in nonattainment for FY22, whether this is the first or second consecutive year of nonattainment (which are marked as “1” or “2” in the “PIP Year” column. A notation of “M” indicates the indicator was in nonattainment in FY21, but Met the performance target in FY22), the FY22 actual performance achieved by the district (listed only for indicators in nonattainment for which a PIP is due), and the FY22 target performance level for attainment.
2. **Attached to the emailed notification letter are the FY22 Program Improvement Plan forms for First Year nonattainment and/or Second Year of Nonattainment as needed.** Copy such form(s) as needed, and complete one form for each indicator that was not met in FY22.
3. **For First Year of Nonattainment:**
 - a. Indicate the name of the Career Technical Planning District in the marked space.
 - b. Use the dropdown menu to select which “Not Met” Performance Indicator this Program Improvement Plan addresses. Such “not met” indicators are found in the letter of noncompliance sent from the Ohio Department of Education, and can further be found in the CTPD Report Card - Federal Indicators table in the Secure Data Center.
 - c. Indicate the Actual Performance (from CTPD Report Card – Federal Indicators in percent format, Indicate the Performance Standard for that Year, Calculate the number of students who needed to move from nonattainment to attainment for the standard to have been met)
 - d. Please add the Root Cause of the failure to meet the Performance Indicator, likely drawn from the Student Performance Question Group of the FY23-24 Comprehensive Local Needs Assessment.
 - e. Provide an analysis of significant gaps in performance between special populations and subgroups, which gaps – when closed – will contribute to attainment of the goal.
 - f. Please develop and write at least strategy designed to reduce the gap to zero, indicating the target date for compliance, you may add rows as needed.



- g. Add as many Action Steps under each strategy as appropriate. Action steps must be documentable and projected action or completion dates must be expressed, so it is clear when such actions are planned and then taken. When taken, record of such action should be collected and maintained for audit and accountability purposes.
 - h. At least one Action Step **must** address efforts to close gaps between special populations and subgroups.
 - i. Strategies and action steps must be “reasonably and logically related” to attainment of the performance standard.
 - j. Ensure the year of the PIP (numbered year of nonattainment) is marked correctly (Year One).
 - k. Check boxes indicating stakeholders were consulted in the development of the Program Improvement Plan. Also indicate that each action step can and will be documented. Please retain documentation of such.
 - l. The Superintendent should electronically sign and date the form, and return it by email to the district’s Administrative Field Services consultant, who is the person who signed the letter notifying the district that a PIP is due.
 - m. The Administrative Field Services consultant will review and approve or deny the Program Improvement Plan based on the criteria listed below, by May 2, 2023 (15 calendar days), and will sign and return a completed copy of the Program Improvement Plan to the Superintendent upon determination the PIP meets the stated criteria. In the event a denial is issued, the consultant will notify the district of the insufficiency, and the Program Improvement Plan must be resubmitted within 30 days of the original submission (which will be 15 days or more after the denial is issued).
4. **For Second Year of Nonattainment.** Any indicator identified by a 2 was also in nonattainment in FY21 and a PIP was due.
- a. Please use the radio box to indicate which Performance Indicator was in the second year of nonattainment for which a Program Improvement Plan was due. (In FY21, the Department did not required PIPs for the three academic indicators and for post-program placement, since they were calculated so late in the year.)
 - b. Update the FY21 Root Cause Analysis, which may be copied from the prior year if it is still deemed applicable at this point in time. The Root Cause Analysis should include any updates in the reason for nonattainment over the past year (for instance, staff turnover resulting in delays in implementation would be added to the Root Cause Analysis if attainment had been projected within the year, but was not achieved).
 - c. Update the analysis of disparate performance, using the appropriate reports in the Secure Data Center. Such data is found as follows:
 - i. **For Nontraditional Program Concentration:** CTPD Current Year Concentrators Report (CTPD Disaggregate tab)
 - ii. **For Work-Based Learning:** Work-Based Learning Participation (CTPD) Report – (CTPD Disaggregate tab)
 - iii. **For Technical Skill Attainment:** Available in the Equity Lab data report.
 - iv. **For Academic Indicators:** CTPD Proficiency Levels (Proficiency Levels Report – Demographics tab)
 - d. Assess the progress toward completing and the results of Action Steps for two of the key strategies from the Year One PIP. (If there was only one strategy, assess that one.)



- e. Use the Checkbox to indicate whether the Year One PIP has appropriate and timely Action Steps for FY23 and FY24 and should be continued, or if the Action Steps and strategies will be updated and re-written. Please note that Action Steps that were to be completed prior to the date of the new PIP can not be extended as part of PIP activities for the coming year. Also please note that at least one Action Step must be written to clearly show that it will start prior to June 30, 2023. This Action Step should be marked with an asterick (*) to aid in the Department's review of the federal requirement that a PIP must begin in the year following the year of nonattainment. Where a PIP does not show an action to begin by June 30, 2023, it will not be approved and will be returned for resubmission.

Submission Requirements

Program Improvement Plans must meet the following minimum requirements upon review, or they will be returned for revision and resubmission.

1. Must indicate the Career Technical Planning District name
2. Must indicate the indicator for which the PIP is directed.
3. Must include FY22 actual performance (from letter), and projections for coming years until the performance level will be met.
4. Must include a Root Cause Analysis.
5. Must include an analysis of disparate performance and/or performance gaps.
6. Must include at least one Strategy (you may wish to align these with the [Requirements for the Uses of Funds](#), which are also the Perkins Plan strategies, Action Steps to be funded can be easily added to the FY24 Perkins Plan Annual Update.
7. Must include at least one Action Step clearly defined to begin prior to June 30, 2023.
8. Must include at least one Action Step designed to reduce gaps in performance between special populations and/or subgroups.
9. Must have the two certifications checked (that action steps are documentable and that documentation will be retained).
10. Must have the Superintendent's electronic signature.

Program Improvement Plan Sanctions Policy

Pursuant to the Carl D. Perkins act (Perkins V- Strengthening Career and Technical Education for the 21st Century Act), Ohio has developed policies to administer portions of that act, including this policy regarding Program Improvement Plans and potential sanctions.

Section 123 of the Act requires the Department of Education to evaluate eligible recipients annually for attainment of the local levels of performance. If an eligible recipient fails to meet at least 90 percent of an indicator for any of the core indicators of performance, the eligible recipient must develop a Program Improvement Plan during the first program year succeeding the program year of nonattainment.

The Program Improvement Plan must include an analysis of the performance disparities or gaps between the performance of special populations and subgroups, the actions that will be taken to address those gaps in consultation with local stakeholders, and a commitment to document the above.



Pursuant to the Perkins Act, after notice and opportunity for a hearing the Ohio Department of Education may withhold all, or a portion of, the eligible recipients allotment if the eligible recipient:

- 1) fails to implement a program improvement plan, or
- 2) fails to meet at least 90% of the local level of performance for any core indicator for two consecutive years.

The following procedure will be implemented in the event an eligible recipient of Perkins funding fails to meet 90% of the local performance target.

- A) Recipient fails to meet 90% of the performance target
 - 1) Notification of noncompliance will be by electronic means.
 - 2) Recipient must submit an approvable Program Improvement Plan to the department within 60 days of the date of the notice. Approvable plans will consist of:
 - a) A plan to increase performance to specified levels over a period of no more than 3 years.
 - b) Action Steps that are measurable with dates of achievement.
 - c) At least one Action Step designed to close gaps between the performance of special populations and subgroups.
 - 3) This notification serves as full and adequate notice for due process purposes.

Level A Sanction: If the recipient does not submit an approvable PIP by the deadline, Perkins funds may be withheld until a complete plan is submitted and approved.

- B) Recipient fails to implement action steps of program improvement plan in year one of the Program Improvement Plan and/or fails to meet 90% of local performance target for two consecutive years.
 - 1) Notification of noncompliance will be by electronic means.
 - 2) The recipient has sixty calendar days, commencing from the date of the notification email, to respond in writing with an explanation of why progress was not made, the status of each action step, how Perkins funds will be targeted, and submit a revised Program Improvement Plan.
 - 3) This notification serves as full and adequate notice for due process purposes.

Level B Sanctions: ODE may direct all or a portion of Perkins funds to be used to specifically targeted activities designed to improve the particular performance indicator(s) that have not been met.

- C) Recipient fails to meet 90% of local performance target for three consecutive years, or fails to make meaningful progress in implementing action steps of an approved program improvement plan by Year Two of the PIP.
 - 1) “Meaningful progress” means the recipient has not completed 50% of an action or created conditions leading to the imminent implementation of an action.
 - 2) Notification of non-compliance will be by electronic mail **and U.S. Postal Service**.
 - 3) The recipient has 60 calendar days commencing from the postmark on the notification letter, to respond.
 - 4) The notification letter serves as full and adequate notice for due process purposes.

Level C. Sanctions: ODE may require all or a portion of Perkins funds be used for specifically directed activities designed to improve the particular performance indicators that are not meeting target, or all or a portion of Perkins funds may be withheld.

Technical Assistance

ODE will provide technical assistance to recipients who have failed to meet the 90% target percentage. Technical assistance may include, but is not limited to:



- Telephone conferencing and support
- Training, workshops, or professional development
- Resources and other materials
- Site visit

Due Process:

Waiver: Recipients may apply for a one-year waiver of sanctions due to exceptional and uncontrollable circumstances, such as a natural disaster or a precipitous and unforeseen decline in financial resources.

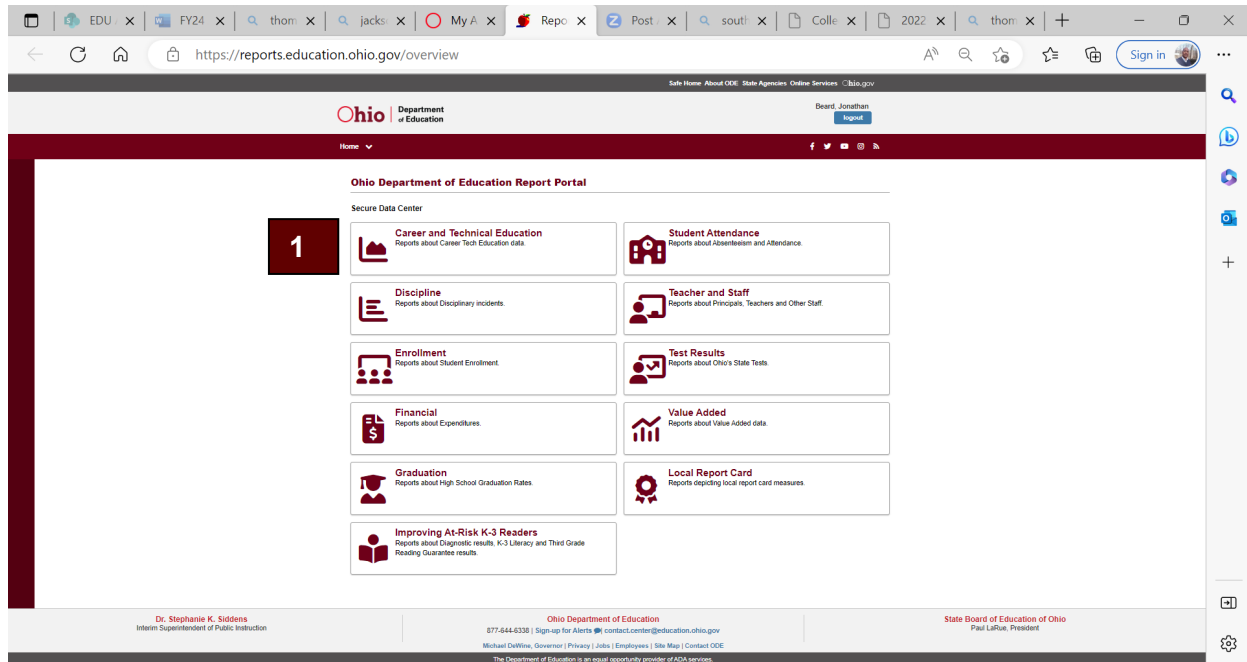
Notice: All recipients will be notified by electronic means. U.S. Postal Service shall also be used when funds may be withheld.

Hearings: Recipients may request a hearing. Requests for a hearing must be made in writing and received within fifteen days of the postmark on the notification letter.

Withheld and targeted funds: ODE shall direct the use of withheld and targeted funds to provide services and activities to students served by the recipient.

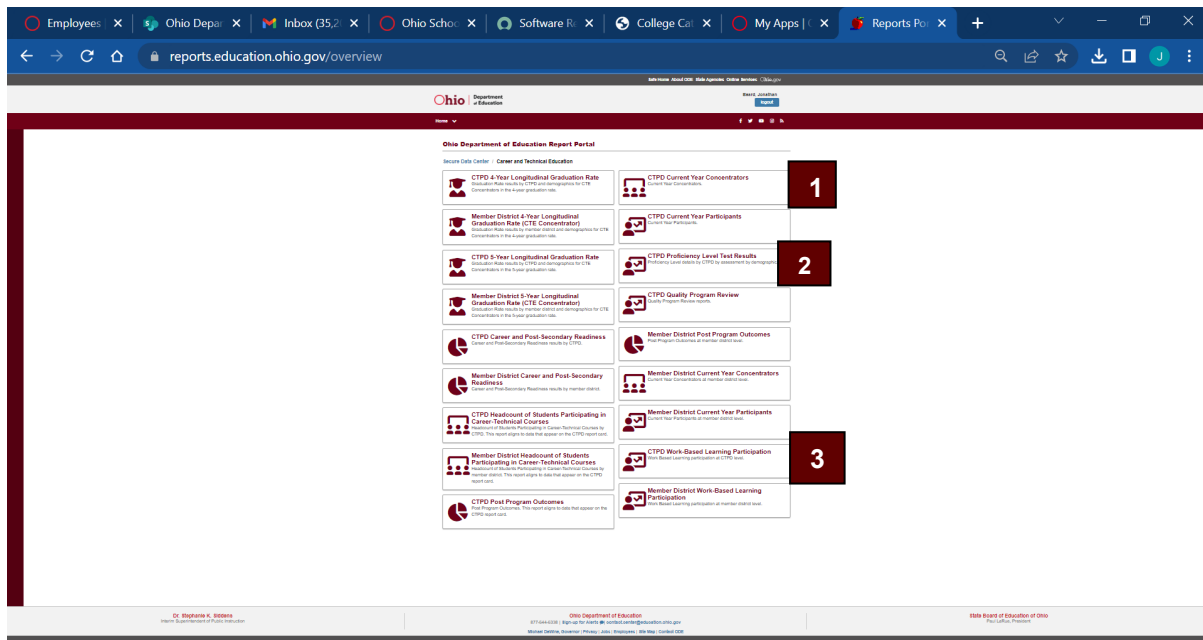


Screenshots of Disaggregated Data Reports



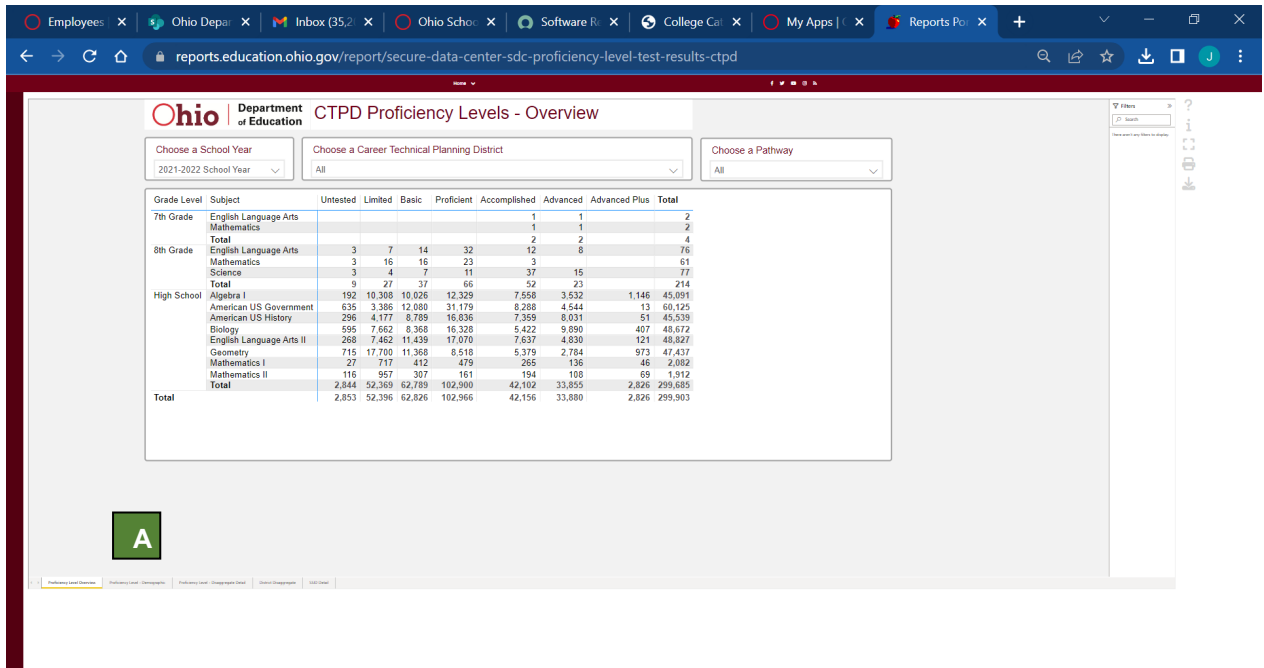
Action Steps

- 1 Click on the Career and Technical Education button



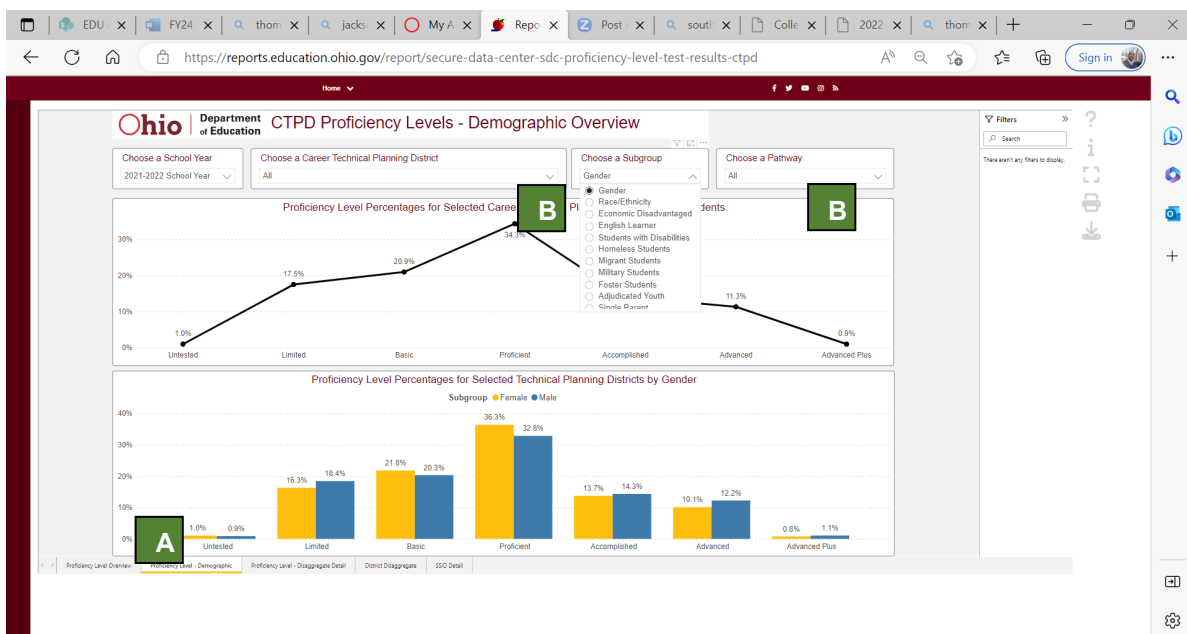


1. CTPD PROFICIENCY LEVEL DATA



Information

A Note tabs to provide additional information



Information

A Note tabs to provide additional information



B

Subgroup and pathway dropdown provide data to target interventions

EDU x FY24 x thom x jacks x My A x Repo x Post x soutr x Colle x 2022 x thom x +

https://reports.education.ohio.gov/report/secure-data-center-sdc-proficiency-level-test-results-ctpd

Home

Ohio Department of Education CTPD Proficiency Levels - Demographic Detail

Choose a School Year
2021-2022 School Year

Choose a Career Technical Planning District
All

Choose a Pathway
All

Filters
Search
There aren't any filters to display.

Subgroup	Untested	Limited	Basic	Proficient	Accomplished	Advanced	Advanced Plus	Total
All Students	2,853	52,396	62,826	102,966	42,156	33,880	2,826	299,903
Female	1,366	21,257	28,464	47,466	17,935	13,196	1,030	130,714
Male	1,487	31,139	34,362	55,500	24,221	20,684	1,796	169,189
American Indian or Alaskan Native	3	63	78	135	38	37	4	358
Asian or Pacific Islander	49	705	802	1,362	885	1,125	145	5,073
Black, Non-Hispanic	885	11,590	9,836	10,013	2,350	1,106	73	35,933
Hispanic	186	3,358	3,499	5,010	1,709	1,073	64	14,899
Multiracial	175	2,182	2,721	3,963	1,409	1,025	100	11,575
White, Non-Hispanic	1,555	34,500	45,892	82,494	35,769	29,439	2,442	232,091
Economic Disadvantaged	1,860	28,785	28,170	34,277	10,259	6,408	365	110,124
Not Economic Disadvantaged	994	23,648	34,708	68,748	31,921	27,485	2,463	189,967
English Learner	70	2,102	1,287	649	56	33		4,197
Not an English Learner	2,783	50,294	61,539	102,317	42,100	33,847	2,826	295,706
Students with Disabilities	710	20,486	13,670	9,202	1,589	1,083	26	46,766
Students without Disabilities	2,144	31,920	49,166	93,771	40,569	32,797	2,800	253,167
Homeless Students	67	630	522	482	138	59	6	1,904
Not Homeless Students	2,786	51,766	62,304	102,484	42,018	33,821	2,820	297,999
Migrant Students	23	16	18		3	1		61
Non-Migrant Students	2,853	52,373	62,810	102,948	42,153	33,879	2,826	299,842
Military Students	10	193	270	576	259	193	23	1,524
Non-Military Students	2,843	52,204	62,559	102,392	41,897	33,686	2,803	298,366
Foster Students	37	613	596	660	191	114	3	2,214
Not Foster Students	2,816	51,783	62,231	102,306	41,967	33,766	2,823	297,692
Adjudicated Youth Students	8	98	90	64	20	11		311
Not Adjudicated Youth Students	2,845	52,298	62,736	102,882	42,136	33,869	2,826	299,592
Single Parent	8	255	225	211	32	13		744
Not a Single Parent	2,845	52,141	62,601	102,755	42,124	33,867	2,826	299,159
Nontraditional Concentrator	458	7,141	9,453	16,337	6,755	5,419	440	46,003
Not a Nontraditional Concentrator	2,395	45,273	53,426	86,750	35,444	28,468	2,388	254,164

Proficiency Level Overview Proficiency Level - Demographic Proficiency Level - Disaggregate Detail District Disaggregate SDC Detail

A

Information

A

Note detail in Proficiency Level Disaggregate Data tab



2. NONTRADITIONAL PROGRAM CONCENTRATION DATA

https://reports.education.ohio.gov/report/secure-data-center-sdc-current-year-concentrators-ctpd

Ohio Department of Education Current Year Concentrators (CTPD) - Disaggregate Detail

Choose a Career Tech Planning District: All

Choose a Subgroup: B

Choose a Pathway: All

Subgroup	2020-2021 School Year	2021-2022 School Year
All Students	83,256	83,461
Female	37,007	36,789
Male	46,249	46,672
American Indian or Alaskan Native	98	103
Asian or Pacific Islander	1,458	1,469
Black, Non-Hispanic	10,494	9,697
Hispanic	3,925	4,077
Multiracial	3,122	3,181
White, Non-Hispanic	64,170	64,943
Economic Disadvantaged	32,816	29,901
Not Economic Disadvantaged	50,684	53,620
English Learner	1,225	1,160
Not an English Learner	82,031	82,301
Students with Disabilities	13,319	12,829
Students without Disabilities	69,943	70,641
Homeless Students	585	537
Not Homeless Students	82,673	82,925
Migrant Students	8	19
Non-Migrant Students	83,248	83,442
Military Students	408	450
Non-Military Students	82,850	83,013
Foster Students	547	553
Not Foster Students	82,716	82,879
Adjudicated Youth Students	70	73
Not Adjudicated Youth Students	83,187	83,388
Single Parent	234	216
Not a Single Parent	83,022	83,245
Nontraditional Concentrator	12,346	12,599
Not a Nontraditional Concentrator	70,973	70,941

Demographic Overview CTPD Disaggregates Trend District Disaggregates SDO Detail

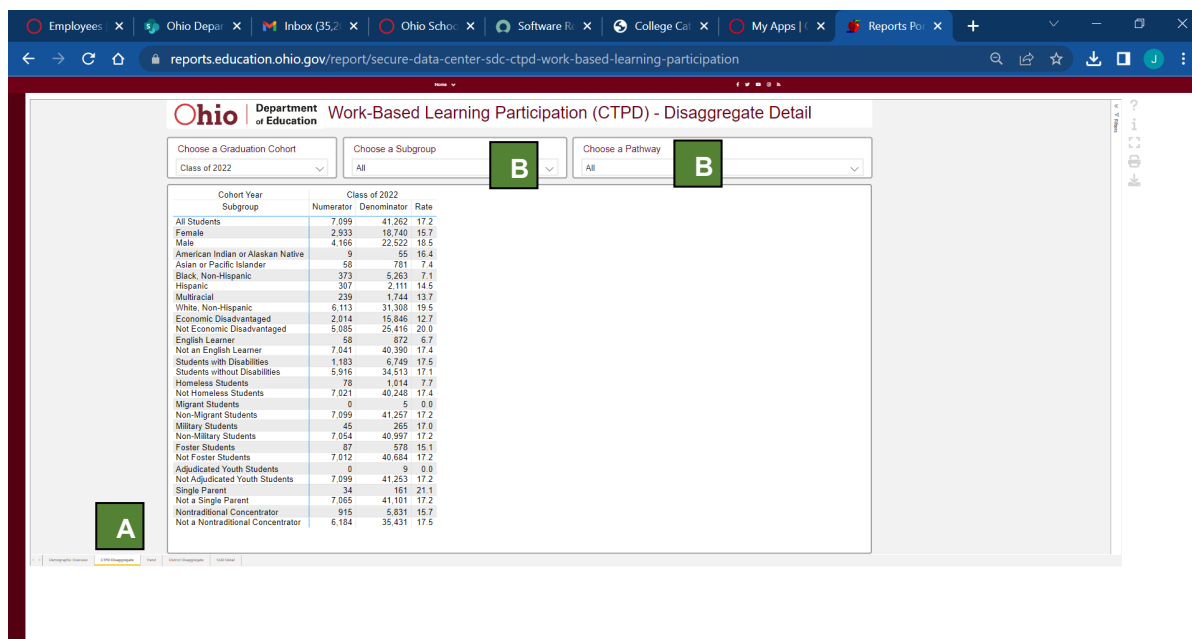
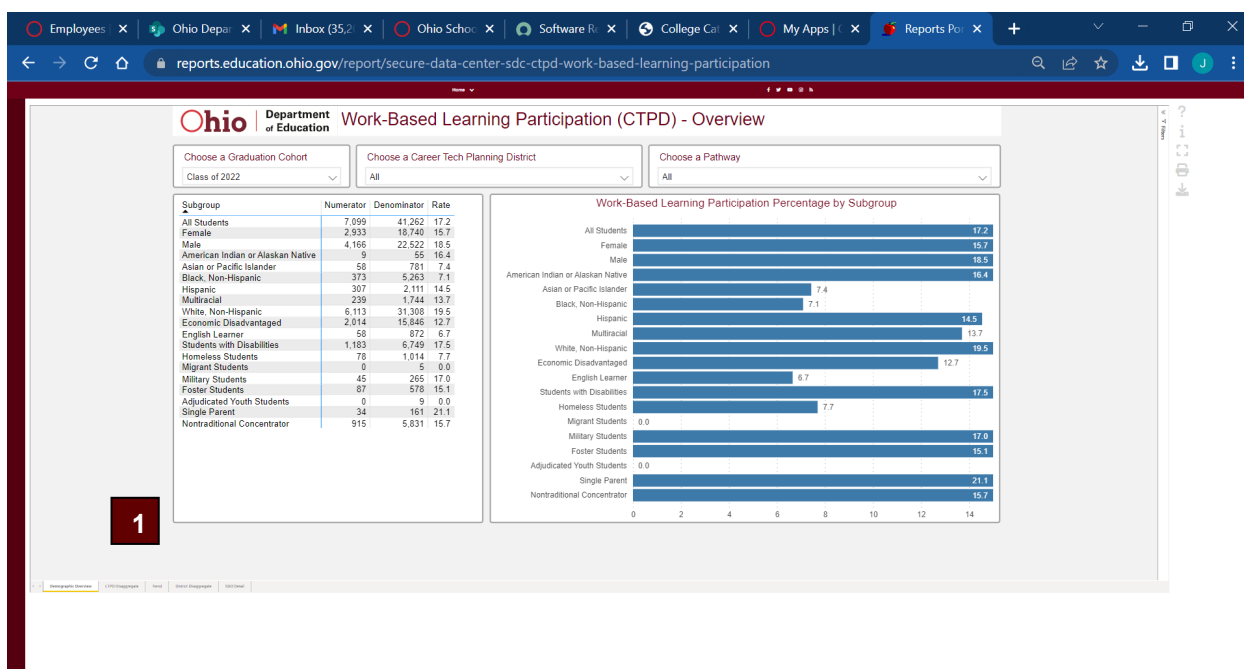
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Information

A Note detail in CTPD Disaggregate tab

B Note subgroup and pathway dropdowns allow for data to support targeted interventions

3. WORK-BASED LEARNING PARTICIPATION RATES



Information

A	Note the CTPD Disaggregate tab provides additional information about potential disparities
B	Views by subgroup and pathway provide additional information