

DOCUMENT RESUME

ED 305 796

EC 212 596

TITLE An Examination of the Impact of the Carl D. Perkins Vocational Education Act of 1984 on Our Nation's Citizens with Disabilities. Special Report.

INSTITUTION American Vocational Association, Arlington, VA. Div. of Special Needs.; National Association of Vocational Education Special Needs Personnel.; President's Committee on Employment of People with Disabilities, Washington, DC.

PUB DATE 88

NOTE 25p.; Hearing conducted at the Annual Convention of the American Vocational Association (Las Vegas, NV, December 6-10, 1987).

PUB TYPE Reports - Evaluative/Feasibility (142) -- Collected Works - Conference Proceedings (021)

EDRS PRICE MF01/PC01 Plus Postage.

DESCRIPTORS Adult Education; Agency Cooperation; Compliance (Legal); *Disabilities; Educational Legislation; Employment Potential; *Federal Aid; *Federal Legislation; Government Role; Opinions; Program Effectiveness; Program Evaluation; Secondary Education; *State Programs; *Vocational Education; *Vocational Rehabilitation

IDENTIFIERS *Carl D Perkins Vocational Education Act 1984

ABSTRACT

The report by the Employment Preparation Committee of the President's Committee on Employment of People with Disabilities examines the impact of the 1984 Carl D. Perkins Vocational Education Act in light of its consideration for renewal in 1989. A position statement by the Committee urges the adoption of seven principles concerned with (1) setting aside of 10% of vocational education funds to serve disabled youth; (2) requiring statewide aggregate, 50:50 match of setaside funds; (3) strengthening the required role of certified rehabilitation counselors; (4) permitting states to use 10% of funds for program improvement projects and activities; (5) requiring programs and services at all levels for both youth and adults; (6) strengthening provisions for interagency agreements and coordination; and (7) broadening criteria for evaluating the effectiveness of vocational education programs. The major portion of the document contains the proceedings of hearings held to identify reauthorization issues and includes a hearing summary and the following written statements: a position statement of the National Association of Special Needs Administrators; a joint position statement of the American Rehabilitation Counseling Association and the National Rehabilitation Counseling Association; a statement on dropouts and potential dropouts by the Legislative Study Committee of the Special Needs Division of the American Vocational Association; and a position statement of the National Association of Vocational Assessment in Education. (DB)

SPECIAL REPORT:
AN EXAMINATION OF THE IMPACT OF
THE CARL D. PERKINS
VOCATIONAL EDUCATION ACT OF 1984
ON OUR NATION'S CITIZENS
WITH DISABILITIES



Prepared By:

**The President's Committee
on Employment of People
With Disabilities**



AVA — SPECIAL NEEDS DIVISION



**National Association of
Vocational Education Special
Needs Personnel**

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INTRODUCTION

The Carl D. Perkins Vocational Education Act of 1984 provides new opportunities for students with disabilities at the secondary, post-secondary, and adult levels. The Act will be coming up for renewal in 1989.

Over the past several months the Employment Preparation Committee of the President's Committee has been engaged in an examination of the impact of the Carl D. Perkins Vocational Education Act. Members of the committee have reviewed various documents and reports which portray how individuals with disabilities and other special needs students are served in our nation's vocational education programs. Additionally, the Committee co-sponsored a special hearing to identify reauthorization issues. It was held at the 1987 Convention of the American Vocational Association. This hearing provided an excellent opportunity for professional groups and individuals directly involved in vocational education programs to offer insights as to the quality, effectiveness, and impact of the Perkins Act. The Proceedings from that Hearing are outlined in this document.

As studies (such as the National Assessment of Vocational Education) are released and as other legislative positions are published, the President's Committee intends to study these as well. We look forward to participating in this most important dialogue concerning the improvement of federal vocational education policy.

HAROLD RUSSELL

**POSITION STATEMENT ON REAUTHORIZATION
OF THE CARL PERKINS VOCATIONAL EDUCATION ACT OF 1984**

As the Congress moves toward reauthorizing the Perkins Act in 1989, we urge the adoption of the following principles and positions:

1. Continuation of the provisions requiring state boards of vocational education to spend at least 10% of the designated basic grant funds received to serve youth and adults with disabilities in vocational education programs. Funds should continue to be used for the excess costs associated with educating all students with disabilities in the least restrictive vocational education environments at the secondary, post-secondary, and adult levels.
2. Provisions requiring a state-wide aggregate, 50:50 cash match of setaside funds for serving students with disabilities and disadvantaged students should also be extended. Such provisions assure that state and local funds are also used to provide the excess cost required to serve students with disabilities in an effective and comprehensive manner.
3. In Section 204(c) which prescribes four essential services that are to be provided to all disadvantaged students and students with disabilities, the role of certified rehabilitation counselors should be strengthened. The vast majority of schools and community colleges offering vocational education programs have available to them (but do not fully utilize) rehabilitation counseling services that could directly facilitate the provision of vocational assessment, career development, and the school to work transition for students with disabilities.
4. To strengthen the State Board of Vocational Education's capacity to improve programs and services throughout the state, States should be allowed to use up to 10% of the setaside funds for targeted program improvement projects and activities. Projects, such as modifying state wide curricula for students with disabilities, should be based on clearly identified needs that will directly enhance the ability of professionals and eligible recipients to improve their programs and services for students with special needs. These funds should be restricted to projects or activities providing leadership development, inservice or preservice education for personnel working in vocational special needs education, applied research and development studies, evaluation of experimental or model demonstration programs, and dissemination activities.
5. The reauthorized legislation should continue to emphasize programs and services at all levels for both youth and adults who are disabled. The Act should require states to carefully study and plan for the needs of individuals with disabilities, but should not go as far as to specify a minimum percentage of funds to be spent on post-secondary or adult vocational education programs.
6. Provisions in the Act for interagency agreements and coordination should be continued and strengthened. At the state level, provisions for detailed interagency agreements should exist between the State Board of Vocational Education and the state agencies responsible for programs funded under the Rehabilitation Act, Job Training Partnership Act, the Education For All Handicapped Children Act, the Bilingual Education Act, and Chapter 1 of the Educational Consolidation and Improvement Act. Among the various considerations for interagency collaboration should be the development of: common definitions, common planning cycles, joint advisory committees at the state and local level, coordination of transitional services, coordination of job development and job placement programs and services, and special provisions to assure that early intervention programs (e.g. career exploration for all youth with disabilities) are planned and implemented.
7. As vocational education programs take on new instructional purposes (e.g. assuring that students acquire technological literacy, enhancing acquisition of basic skills), criteria for evaluating the effectiveness of vocational education programs must be appropriately broadened. The relevance of traditional criteria such as job placement, employer satisfaction with occupational skills, and post-program earnings must be re-considered. The Act should assist eligible recipients in developing and using program evaluation measures which reflect the degree to which vocational instruction contributes to the attainment of educational goals specified in the student's IEP, including the acquisition of knowledge and skills needed for transition to the workplace, further education, and/or adult services.

HEARING PROCEEDINGS

As the Congress moves toward the reauthorization of the Perkins Act in 1989, various professional organizations, study groups, and professionals are actively engaged in examining the impact and effectiveness of the Act. To help facilitate this inquiry process relative to special population provisions of the Act, the Special Needs Division of the AVA and the President's Committee on Employment of People with Disabilities co-sponsored a hearing during the 1987 AVA Convention in Las Vegas. Prior to the convention, individuals and organizations involved in or associated with vocational special needs education programs were invited to provide testimony at the hearing. The major purposes of the Hearing were twofold: (a) assessing the impact and effectiveness of the Perkins Act, and (b) offering suggested revisions for the Perkins Act. Prior to the Hearing, statements were received from the Colorado Council on Vocational Education, the National Association of Special Needs State Administrators, and the National Rehabilitation Counseling Association/the American Rehabilitation Counseling Association. Several position papers and letters were received from individuals and organizations unable to attend the Hearing. Each of the statements received prior to and following the Hearing appear in Appendix I.

A Hearing Panel, composed of representatives of the President's Committee (Employment Preparation Committee), the American Vocational Association, and the officers of the various affiliated organizations of the Special Needs Division, conducted the 2-hour hearing. The individuals serving on the Hearing Panel are identified at the end of this report.

Hearing Summary

During the Hearing a number of diverse issues were raised by those who testified, the panelists, and members of the audience. As noted above, three individuals had submitted written testimony prior to the convention. These individuals (Dr. Donn Brolin, University of Missouri—representing the American Rehabilitation Counseling Association/National Rehabilitation Counseling Association; Ms. Sharon Full, Illinois State Board of Education—representing the National Association of Special Needs State Administrators; and Ms. Carole Custer of the Colorado Council on Vocational Education) were invited to appear as the initial panelists at the Hearing so that members of the panel could pose questions regarding the issues and recommendations raised in their position statements. Dr. Brolin and Ms. Full appeared, but Ms. Custer was unable to attend due to some unanticipated, extenuating circumstances. Following their interactions with the Panel, three additional persons (Dr. Carole Johnson; Colorado System for Occupational Education and Community Colleges; Dr. Michael Peterson, Mississippi State University; and Ms. Jeanne Lopez-Valadez of the Northwest Educational Cooperative, Arlington Heights, Illinois) offered oral testimony during the latter half of the hearing. Dr. Johnson's comments were offered from the perspective of her experience in state administration of the Perkins Act. Dr. Peterson's input was on behalf of the National Association of Vocational Assessment in Education, while Ms. Lopez-Valadez spoke representing the National Coalition for Vocational Education for Limited English Speakers. Several questions and issues were raised by some of those (approximately 50) in the audience as well.

The sections which follow attempt to summarize the points of view raised by various provisions of the Perkins Act. Rather than provide a verbatim transcript of the hearing, this summary is organized around what appear to be a set of central issues to be examined in the Reauthorization process.

Growth in Programs and Enrollment

Two individuals who testified noted that while the Perkins Act has only been in place for 2½ years, there has been a tremendous growth in the number of services, programs, and students enrolled. Enrollment growth appears most notable for Limited English Proficient (LEP) and youth and adults with disabilities. Since federal data collection on enrollment was suspended in 1983, there are no national data to support this trend. However, individuals from several states have reported positive growth in programs and services that have been commensurate with the increased funding of special populations in the 1984 Perkins Act.

Specific studies indicate that LEP enrollment in vocational education programs has increased by as much as 35% over the past two years in 10 states. While those who are LEP constitute 10% of our school-age population, some of those served in the Handicapped and Disadvantaged setaside programs are also LEP.

Funding for Statewide Activities

The present language of the Perkins Act requires states to distribute the "disadvantaged and handicapped" funds directly to eligible recipients (local educational agencies and post-secondary institutions) for programs and direct services. Several individuals felt that state boards should be granted some flexibility to use the setaside funds for statewide projects and activities that would directly benefit programs and teachers who work with special needs students. Estimates of the funds that should be allowed for such use at the state level ranged from 5-20% (of the 32% currently setaside for the "handicapped and disadvantaged"). It was noted by several commenters that these activities should be carefully structured to ensure that curriculum development or adaptation, research, or inservice training which is supported directly address identified local needs and produce outcomes that are substantial. It was also noted that these program improvement activities should be consistent (programmatically and philosophically) with the primary thrust of serving students with disabilities and disadvantaged students in mainstream vocational programs to the maximum extent possible.

Matching and Excess Cost

Under the current legislation, states or local eligible recipients are required to match the federal funds they receive and to use these funds reimbursing for not more than one half of the excess costs associated with serving students with disabilities and disadvantaged students. Some state boards of vocational education have chosen to pass along all match responsibilities to the local eligible recipient, where others use state funds for all or a portion of the match.

The position of the NASNSA and others testifying at the Hearing supports retaining the match and excess cost principles because they help to ensure a local and state commitment to educating individuals with special needs (i.e. the provisions ensure that special needs students receive the same level of local funds for their education as all other students.) In some states with economically depressed communities where the matching requirement is passed to the local level, there have been requests for relief from the matching requirement. The NASNSA has endorsed a position that up to 20% of the setaside funds could be used without matching funds for the state or local level.

It was further noted that the present law clearly indicates that local eligible recipients cannot be denied federal funds because they are unable to match. The language in the current law is somewhat confusing on this point because it does not describe the matching requirement clearly as an "aggregate state match"--which is what the regulations and current federal policy allow. It appears that some states may need additional assistance in helping local and state agencies in appropriately planning and designating the use of matching funds.

The point was raised that inconsistency exists in the present law where matching and excess cost requirements exist for the students with disabilities and disadvantaged students, but similar requirements are not present for other special populations, e.g. single parents, incarcerated, and displaced homemakers. Under these programs local eligible recipients can use 100% of the funds they receive for their vocational education programs. Some support was expressed for the view that these programs ought to also have matching requirements.

Post-secondary Allotment

The current law requires federal funds to flow to a sole state agency and does mandate that a certain percentage be spent at the post-secondary level, as was the case in earlier federal vocational education legislation. As increased emphasis is placed on post-secondary and transition options for special population youth, there appears to be some sentiment that funds need to be earmarked for use in post-secondary or adult programs exclusively. However, the two individuals speaking to this issue in the Hearing argued that decisions as to the appropriate funds distribution need to be left totally in the hands of the state board.

Mandated Services

Section 204(c) of the Act requires that local educational agencies provide vocational assessment, support services, career planning and counseling, and transitional services to each "handicapped and disadvantaged student." Several points were raised regarding these new provisions:

- The NRCA/ARCA position supports the position that rehabilitation counseling services be added to the list of mandated services. Considerable debate focused on the appropriate language for assuring the involvement of rehabilitation counseling personnel. It was noted that the current Act calls for the involvement of qualified professional counseling personnel, but does not specify what is meant by "qualified." It was noted that the current language does not preclude the involvement of vocational rehabilitation counselors. It was also noted that providing vocational assessment services to LEP students is particularly problematic, due to the lack of testing and assessment materials in a bilingual or native language format.
- Individuals speaking on behalf of the vocational assessment provisions noted that the language is too vague, and could be strengthened to suggest that vocational assessment is a continuous process that parallels instruction rather than a single event occurring before a student enters a vocational program. They also expressed the view that the assessment should include assessment of the student's learning style, and that the results should be used to plan individualized programs and assess the effects of instructional efforts. Lastly, it was suggested that more training and technical assistance be provided under the Act for those individuals charged with vocational assessment responsibilities.
- It was noted that it is often difficult or impossible to find professionals and support systems in local educational agencies who work extensively with the disadvantaged population. An infrastructure has not been built in schools and community colleges which parallels the structure which serves youth with disabilities. Thus, assuring that the mandated services are provided to each disadvantaged student is considerably more complex.

Limited English Proficient Students

Several concerns related to serving non- or limited English speaking students in vocational education were raised. In the Act, this population receives funding from both the disadvantaged setaside and Title IV, Part C—Bilingual Vocational Training. The vocational education needs of the nation's LEP population, which is primarily composed of young adults, are being addressed quite effectively through the Federal discretionary program (Title IV, Part C) where grants and contracts are provided for specific bilingual vocational programs, as well as research, teacher training programs, and technical assistance for professionals at the state and local level. It was suggested that the inclusion of LEP students in the disadvantaged setaside is less effective than it might be because there are few incentives to court and serve LEP students in many local districts. Also, many of the needs for this population are for short-term job training at the post-secondary or adult levels, which are often under-funded by states.

Additional concerns focused on the lack of language minorities in professional positions in vocational education, the lack of national data describing the participation of LEP students and minority staff in vocational education, and the need for stronger leadership for LEP concerns at the state and national level.

Early Intervention

Two commenters voiced serious concern about the need to assure that at-risk populations receive earlier attention relative to their career development. Through coordination with other federal programs, such as EHA, JTPA, and Chapter I, more must be done to assure that special population students: (a) have appropriate career awareness and exploration activities, (b) come to understand the importance and value of work, and (c) have interactions with positive role models. Early experiences such as this would enable vocational education programs to be more effective because they would be building upon solid foundations for learning. While emphasis needs to be placed, as it has in the past, on the development and implementation of effective interagency agreements, attention should also be given to the matter of developing appropriate federal policy in the prevention and early remediation of educational problems facing young children that have an effect upon their capacities to profit from vocational education programs.

Reauthorization Hearing Panel

- Dr. R. Brian Cobb, President
National Association of Vocational Special Needs Teacher Educators
Burlington, Vermont

- Ms. Nan Coleman, President
National Association of Special Needs State Administrators
Raleigh, NC

- Ms. Charlotte Conaway, Program Specialist
Vocational and Adult Education
U.S. Department of Education
Washington, DC

- Mr. Willie Horsely, President
National Association of Vocational Education Special Needs Personnel
Kansas City, MO

- Ms. Faith Kirk, CRC, Program Manager
President's Committee on Employment of People with Disabilities
Washington, DC

- Ms. Pam LeConte, President
National Association of Vocational Assessment in Education
Laurel, MD

- Mr. Gordon Raley, Assistant Executive Director
Governmental Relations
American Vocational Association
Alexandria, VA

Appendix I—Written Statements and Correspondence

- Position Statements on Reauthorization, National Association of Special Needs State Administrators, Prepared by Sharon L. Full, Dated November 3, 1987.
- NAVESNP Position Statement on the Reauthorization of P.L. 98-524, Prepared by Ann Marie Cook, Dated January 21, 1988.
- The Role of the Rehabilitation Counselor in the Vocational Education of Students with Disabilities, American Rehabilitation Counseling Association/National Rehabilitation Counseling Association, Prepared by Edna Mora Szymanski, CRC, Dated November 6, 1987.
- Written Statement Outlining Concerns and Recommendations for the Revision of the Carl D. Perkins Act, Colorado Council on Vocational Education, Prepared by Carole J. Custer, No date.
- Concerns and Recommendations Regarding the Perkins Vocational Education Act, Michigan Occupational Special Needs Association, Prepared by Nancy J. Ingram, Dated December 4, 1987
- The Dropout and Potential Dropout: Perspectives for Legislative Action in Vocational Education, Prepared by the Legislative Committee, Special Needs Division, American Vocational Association, Spring, 1987.
- Letter, Ruth Gillespie, Chairperson, Career Development Center, Augusta Technical Institute (Georgia), Dated October 23, 1987.
- Position Paper of the National Association of Vocational Assessment in Education (NAVAE), on reauthorization consideration for the Carl D. Perkins Vocational Education Act, no date.

POSITION STATEMENT ON REAUTHORIZATION

National Association of Special Needs State Administrators

Prepared by Sharon L. Full, Dated November 3, 1987

#1 Set-Asides

The set-aside approach has become an integral part of the federal/state vocational education program and should be maintained at or above the present levels to assure that the rapidly growing numbers of at-risk youth and adults of our nation have equal and appropriate access to both regular and special vocational education programs. As the "at-risk" definition continues to expand and as the numbers are projected to increase dramatically, a substantially higher set-aside for the disadvantaged/at-risk youth is an absolute necessity.

#2

Since funds provided in the handicapped and disadvantaged set-asides are direct flow through money, states are not able to fund activities on a statewide level that will benefit handicapped and disadvantaged students as a whole. Five percent of the handicapped and disadvantaged set-aside should be allowed for use on statewide projects such as curriculum, research and material development.

#3

As more emphasis is being placed on the handicapped/disadvantaged (special needs) students it is imperative that there be at least one state level staff person given the full-time responsibility of administering the handicapped and disadvantaged set-aside funds from the Act.

#4 Matching

To assure that vocational students, participating in school districts that cannot meet the matching provision of the "Act", are not denied access to quality vocational education programs, the "Act" should provide that 20% of the funds be made available without a state or local "match" provision providing districts meet criteria established by the state.

#5

Given that no two states are equal in the distribution of vocational handicapped and disadvantaged students between the secondary level and the postsecondary level, the "Act" should provide that the distribution of funds be determined by individual states.

#6

Several federal programs now exist which are designed to enhance the education and employment of handicapped, disadvantaged, limited-English-proficient (LEP) and other at-risk populations. The federal vocational education act must clearly specify how these programs are to interrelate at the state, national, and local levels by adopting common definitions, common planning cycles, and joint advisory committees. Additionally, JTPA, EHA, Chapter I and future dropout legislation must be structured/amended to reflect set-asides of federal funds to support career development and related services. (e.g. prevocational education, basic skills development, etc.)

#7

Only guidance services additional and supplemental to those "regular" guidance services available to all students may be funded by P.L. 98-524 allocations or, if paid by local/state funds, may be used as match for P.L. 98-524 funds.

POSITION STATEMENT

Reauthorization of the Carl D. Perkins Vocational Education Act of 1984

Review Draft for the NAVESNP Board

In 1989 P.L. 98-524, the Carl Perkins Vocational Education Act is to be reauthorized by Congress. This legislation has provided a basis for equal access to quality vocational education for special needs populations. However, issues and concerns still remain involving certain provisions for educational and vocational opportunities to those populations. With the prospect of reauthorization comes the opportunity to address these and other issues and concerns voiced by vocational educators and administrators in fulfilling the law's provisions for special needs populations. This paper presents some general principles that should guide the revision of current federal legislation and policy. These principles are derived from a number of activities undertaken in the past two years by the NASNSA and the NAVESNP and Special Needs Division Legislative Network, including surveys of state special needs administrators, open hearings and discussion sessions at national conferences, reviews of research reports and exemplary program studies, and reviews of recently-published position and policy papers

1. Given the rapid increase of at-risk and special needs individuals requiring vocational education, the total federal expenditures for special populations via the set-asides (Title IIA) and Special Programs (Title III) should not be decreased. Under specified conditions the 7% reduction (Title IIA) would be acceptable. These conditions include:

- program improvement for all students for which the special needs population benefit; and/or
- separate programming for dropouts with 100% funding

Additionally, the proposed reauthorization should address increasing the criminal offenders allotment rather than decreasing it, due to the minimal amount of set-aside money in the original legislation. Increased funding and structure for the corrections populations which should specify both juveniles and adult offenders should be included in the revision of the Act.

2. The current law mandates that 100% of the set-aside funds for handicapped and disadvantaged populations flow directly through to the local eligible recipients which prohibits the use of any federal funds for statewide activities directed towards these special needs populations across the state. This approach has become a widely-accepted, integral part of the federal/state vocational education program and should be continued. In addition to providing programs and related services directly for special needs youth and adults, the Act should allow State boards of vocational education to use up to 15% of the set-aside funds for statewide projects and activities that enhance the provision of vocational education for these special needs populations. The use of this money should be structured so that the states are held accountable for the activities or projects conducted with this set-aside. Projects and activities could include: curriculum and material modification, adaptation and development; research; technical assistance to the local education agencies regarding the provision of services as mandated by the law; pilot demonstration projects; leadership activities; in-service training; teacher education and information dissemination to vocational educators and administrators on the local level.
3. The Act must provide assurances that individuals living in rural or economically depressed communities unable to meet the matching provisions of the Act are not denied access to quality vocational education programs. The Act should allow the distribution of up to 20% of the federal funds without a state or local match requirement, providing that the eligible recipients meet program criteria and standards established by the State board and the Act.
4. Each state varies greatly in the proportion of funds that are directed toward secondary and post-secondary programs based on the unique structure of each state's vocational education program. For this reason the Act should maintain language which allows the distribution of Title II, Part A funds between secondary and post-secondary institutions be left to the discretion of each state and allocated according to the number of students receiving services.
5. Policies guiding a federal set aside approach and state and local planning must be informed by systematic data collected in each state of the actual number of students served, as well as information describing the:
 - education and employment needs of special populations to be served
 - enrollment, program completion, and post-program placement status of special needs students
 - the quality of various vocational program components and support services.

This information and data set should be collected as part of a national vocational education data reporting and accounting system, and designed for effective use at the federal, state, and local levels for purposes of policy formation, planning, and program improvement.

6. The Act must provide assurances that the U.S. Department of Education, Office of Vocational and Adult Education and each State Board will employ an adequate number of professionally qualified personnel to provide comprehensive technical assistance related to interpreting federal and state policy concerning special needs populations.
7. Several federal programs exist which are designed to enhance the education and employment of special needs populations, but the provisions for interagency coordination among these programs at the federal, state, and local level must be strengthened through the adoption of common definitions, common planning cycles, and joint advisory committees. Further, existing Federal legislation (JTPA, EHA, Chapter I, Bilingual Education Act, and future dropout legislation) must be amended or designed to support directly the special populations components of the Vocational Education Act by providing funding for career development activities, prevocational education, basic skills, job development and placement, and other related services.

Comments/Suggested Revisions:

Send or give your comments by February 8 to: **Ann Marie Cook, Department of Special Education, The George Washington University, 2201 G. St. NW, Room 524, Washington, DC 20052. (202) 994-2776**

The Role of the Rehabilitation Counselor in the Vocational Education of Students with Disabilities

Joint Position Statement by the American Rehabilitation Counseling Association (ARCA) and the National Rehabilitation Counseling Association (NRCA)
11/6/87

The provision of effective vocational education services for students with disabilities presents a number of challenges to education professionals. Among these are: accommodation of curricula and classrooms, integration of students in the least restrictive environment, relevancy of quality education to future employment opportunities, evaluation of on-going progress, preparation for employment, and job placement.

Key provisions of the Carl Perkins Act which can optimize the potential of students with disabilities to benefit from vocational education are vocational assessment and career counseling. Rehabilitation counselors are the only professionals whose training includes both career counseling and vocational assessment of persons with disabilities. Yet, rehabilitation counselors are not identified in the Act as essential critical members of the vocational education team.

Numerous studies in recent years have demonstrated the employment potential of individuals with even the most severe disabilities. Vocational education plays an integral role in the realization of that potential. It is our contention that this role can be enhanced through involvement of professionally trained, school-based, rehabilitation counselors.

Rehabilitation counselors are trained to work with individuals with disabilities in a variety of settings and situations. As employees of school districts, rehabilitation counselors assume vital roles in employment preparation of students with disabilities. The remainder of this statement will describe the profession of rehabilitation counseling and the rehabilitation counselor's function in the vocational education of students with disabilities. In conclusion, specific recommendations will be made regarding inclusion of rehabilitation counseling in amendments to the Carl Perkins Vocational Education Act.

The Rehabilitation Counseling Profession

Rehabilitation counselors are employed in a variety of settings including schools, hospitals, state-federal VR agencies, rehabilitation facilities, private insurance companies, and mental health and mental retardation centers. Rehabilitation counselors provide the range of services necessary to enhance optimal functioning of individuals with disabilities by assisting them in adjusting to their disabilities and modifying environments to accommodate individual needs. Thus, rehabilitation counselor functions can be examined along two dimensions—individual and environmental.

Along the individual dimension, rehabilitation counselor functions include vocational assessment, individual and group counseling (including career counseling), vocational and independence planning, and job placement. Along the environmental dimension, rehabilitation counselor functions include coordination of school and community resources, environmental assessment, modification and restructuring of jobs and training environments, and consultation with other professionals regarding the vocational implications of disability.

Historical Perspective

The profession of rehabilitation counseling has been involved in employment preparation of persons with disabilities for most of this century. Its roots in rehabilitation of World War I veterans and civilian rehabilitation trace back to the 1920s. Recorded accounts of involvement in school-based "transition" programs for students with disabilities date back to the 1950s. Professional preparation (masters level) of rehabilitation counselors was funded in 1954 through PL 565.

Educational Preparation

Today, more than 75 masters degree programs in rehabilitation counseling are accredited by the Council on Rehabilitation Education (CORE). These programs provide the equivalent of 2 years of academic training in a wide range of areas including the following:

- 1) Counseling theories, issues, and practices
- 2) Medical and psychosocial aspects of disability and resultant vocational limitations/impediments
- 3) Career development
- 4) Rehabilitation planning
- 5) Vocational evaluation (assessment) and work adjustment
- 6) Job analysis, job modification, and job restructuring
- 7) Job placement and follow-up

Certification

Rehabilitation counselors are nationally certified by the Commission on Rehabilitation Counselor Certification (CRCC) which is accredited by the National Commission for Health Certifying Agencies. Professionals who meet CRCC standards of education and experience and have passed the national certifying examination use the designation CRC, representing certified rehabilitation counselor. They must adhere to CRCC's code of ethics and continuing education requirements.

Employment of Rehabilitation Counselors by School Districts

Rehabilitation counselors are employed by school districts or cooperatives of districts. They serve in vocational education, in special education, and as a bridge between the two. House Report No. 99-860 which accompanied passage of the Education for the Handicapped Act Amendments of 1986 indicated that rehabilitation counseling is a related service in the special education of students with disabilities.

Rehabilitation Counselor Functions Related to the Carl Perkins Act

The Carl Perkins Act contains two specific provisions which fall within the purview of rehabilitation counselors in their application to students with disabilities. These are career counseling and vocational assessment. Rehabilitation counselors are prepared through preservice education for the challenges involved in vocational education of students with disabilities. No other profession has such specialized training in employment preparation of students with disabilities.

Rehabilitation counselors as employees of school districts or cooperatives assist vocational education professionals in realizing and enabling the potential of students with disabilities through a variety of activities including the following:

- 1) Vocational assessment
- 2) Career and psychosocial counseling
- 3) Vocational exploration and career awareness
- 4) Consultation with vocational education and other school-based professionals regarding the vocational implications of disability and potential environmental and curricular modifications
- 5) Coordination of services for individual students with families and community agencies (including state VR agencies)
- 6) Job placement and follow-up
- 7) Coordination of planning and implementation of Individual Transition Plans including, where necessary, job support services (e.g. job coaches, transportation, etc.).

Summary and Recommendations

The Carl Perkins Act (PL 98-524) contains a number of provisions which can enhance the vocational preparation of students with disabilities, including the provision for equal access for persons with disabilities to the full range of vocational services available to non-handicapped students (section 204.a2). We suggest that this provision can be strengthened by the addition of the following wording to Section 204c of PL 98-524.

- (5) rehabilitation counseling services to facilitate vocational assessment, career development, vocational education, and school to work transition for students with disabilities.

Without this addition, most school districts will likely exclude rehabilitation counselors from employment and students with disabilities will not receive the benefit of their specialized training.

WRITTEN TESTIMONY REGARDING REVISION OF THE CARL D. PERKINS ACT

prepared by Carole J. Custer, Member
Colorado Council on Vocational Education

April 6, 1988

Colorado special needs service providers were surveyed by our Council in the Fall of 1986. Based on the input from the 336 responses we received, I submit the following concerns and recommendations:

1. Assessment

Concern: Clarification needs to be made regarding what assessment is, and what is needed. All too often only interests are assessed, and not vocational aptitudes, or individual learning styles of the student. Program tryouts, work samples, and instruments with industrial norms are not widely used.

Recommendation: Clarify what is meant by assessment. Include provision for vocational aptitude assessment, as well as basic skills, abilities and interests. Provide a funding provision to update and regionalize and/or create valid industrial norms for vocational aptitude assessment instruments.

2. Guidance and Counseling

Concern: Vocational instructors are providing a great deal of the guidance, counseling and career development activities for special needs students, because many schools have limited resources.

Recommendation: Target funds in the act to provide more pre-service and inservice training on guidance, counseling and career development for special needs students to vocational instructors.

3. Transitional Counseling

Concerns: Employers are not as involved in the career decision making process as they should be.

There is no funding for Job Placement Services.

The linkage between vocational education and community services needs to be strengthened.

Recommendation: Target funds to encourage job placement of students directly with business and industry.

Encourage, through the language of the Act, a stronger linkage of community resources, i.e. Job Training Partnership Act, and Vocational Rehabilitation.

Concerns and Recommendations
Regarding
The Perkins Vocational Education Act

1. Set Aside Dollars

Concern: The American Vocational Association has proposed that set aside dollars for handicapped students be reduced from the current rate of 10% to 9% and that set aside dollars for disadvantaged students be reduced from the current rate of 22% to 18%.

In the Special Needs Projects in Michigan enrollment of students has increased from a total of 22,224 in the 1981-82 school year to a total of 28,314 in 1986-87.

Recommendation: Given the substantial increase in the number of Special Needs Programs and in the number of handicapped and disadvantaged students in the twenty-six community colleges in Michigan, it is recommended that set-aside dollars remain at the current level (10% handicapped; 22% disadvantaged).

2. Matching Funds

Concern: The Perkins Vocational Education Act currently specifies the following formula for matching dollars in secondary schools and community colleges special needs projects:

50% federal funds—50% matching dollars.

Because of limited fiscal resources a number of school districts and community colleges cannot meet the requirement of 50% matching funds. This situation renders Special Needs Programs inaccessible to some secondary and post-secondary institutions; therefore, an inequity exists regarding the support and assistance available to vocational education students who attend these schools and community colleges.

Recommendation: Reduce the requirement of matching funds from 50%—50% to 75% federal funds and 25% matching dollars.

3. Assessment

Concern: Currently, only Special Needs Programs are required to conduct an assessment of student needs, interests, and abilities. The tool of assessment is a valuable instrument of diagnosis and prescription for student support and assistance and should be required for all participants who are supported by the Perkins Vocational Education Act.

Recommendation: Assessment should be required for all students who are enrolled in vocational education and who receive support assistance under the Perkins Vocational Education Act.

4. Clarification of Language

Concern: The Carl Perkins Vocational Education Act addresses the needs of students in secondary school programs but does not specifically mention student at the post-secondary level.

(Currently, at the post-secondary level in the state of Michigan twenty-six of the twenty-nine community colleges operate Special Needs Programs. These Programs serve disadvantaged students and 1,879 handicapped students during the 1986-87 academic school year.)

Recommendation: The language of the Carl Perkins Vocational Education Act should be clarified to include post-secondary institutions.

**THE DROPOUT AND POTENTIAL DROPOUT:
PERSPECTIVES FOR LEGISLATIVE ACTION IN VOCATIONAL EDUCATION
LEGISLATIVE STUDY COMMITTEE
SPECIAL NEEDS DIVISION
AMERICAN VOCATIONAL ASSOCIATION—SPRING, 1987**

Introduction

The present situation of dropouts from our schools has evolved to a magnitude demanding attention and challenges all of society; especially educators, business and industry, and human service providers. At minimum, one out of four students turn away from our present schools primarily because they do not perceive themselves as succeeding within them and/or cannot find meaning to their educational program with respect to their immediate needs. In some of our large cities the dropout statistic reaches 40% to 50%.¹⁸ In this country we believe in comprehensive schooling and equal opportunity for all students; thus, the magnitude of this situation is troublesome. As well, dropping out of high school negatively affects life with regard to getting and advancing in work, achieving higher standards of living, and contributing to society.¹⁸ A challenge looms before us to reduce dropouts and/or to provide alternative paths to education that will improve the well being of our people.

Although the problem is complex, significant patterns emerge from the literature to indicate that vocational education plays a key role in keeping students in school and attracting students back to school. Vocational education is presently involved in helping to address the dropout via instructional programs and support services being made available in local schools for disadvantaged populations. However, the magnitude of the problem indicates that what is being provided in the way of instructional programs and support assistance is not enough and vocational education should be more involved than is evidenced to date.¹⁷ Significant federal legislation can help foster more involvement and the leadership necessary to more adequately address the situation at hand.

The Population

The magnitude of the dropout population alone challenges federal vocational legislation to make the dropout a significant population for targeted assistance. At present the population is folded into a broad definition of "disadvantaged". This lack of emphasis in and of itself diminishes the importance of the dropout population and allows state and local administrators to ignore emphasis in programming for the dropout at a time when the problem cannot afford to be overlooked. Dropouts are strongly affecting our national economy and all states are contributing to the problem through related welfare costs, unemployment, crime related costs and lost tax revenues. A recent study of costs to society would indicate country-wide costs to be between \$26 thousand and \$200 thousand per dropout and \$20 billion to \$200 billion for each school class depending on assumptions made regarding future earnings and loss projection.¹⁶ Nested within the dropout population are specific minority populations of Blacks and Hispanics, populations that are growing in numbers faster than other populations and will strongly affect the future of this country.⁶ Therefore, targeting the dropout within federal legislation seems reasonable and would help states to work toward a common goal of reducing and serving dropouts which, in turn, should pay dividends to the economy.

Separate Programming

The dropout, although defined differently by different states, establishes one dramatic reality that cannot be discounted by anyone. That reality is that the student has left the conventional school setting. The chances of mainstreaming the dropout back into the same setting for education and/or training are remote, at best. Existing literature suggests the need for both programs. Separate programs designed to accommodate student needs for security, social acceptance, self esteem and self actualization are necessary.^{3, 13, 15}

Although separate programming is recognized as a viable approach to reaching many dropouts, the federal vocational legislation allows only the funding of excess costs for such activity. This restriction serves as a disincentive to local administrators in developing new programs and/or expanding existing programs. At minimum it would be helpful to allow individual states the prerogative to use federal vocational dollars to fund separate programs for all costs related to vocational education for the dropout. This position would serve to alert everyone that vocational education realizes the seriousness of the problem, is assuming a major role in impacting the problem, and seriously supports separate programs where needed.

Business and Industry Ties

The economic rewards of working after a student reaches the age of 16 does serve to entice certain populations to drop out of high school.^{13, 14} Evidence is also available to suggest that teenagers become more intense with working as their age increases.⁹ This information indicates that business and industry control major motivating tools (work and money) that could be used to help keep students in school and provide needed training. Strong ties between business and industry and school are necessarily implied as a major initiative that can be promoted within legislation for services for dropouts and dropout prevention.

The challenge which can be addressed through legislation is to blend education and vocational training with business and industry to assure that business is moving toward the best interests of students and collaborating with education to emphasize the importance of increased education and training. Federal legislation can provide resources to encourage:

- a) "local planning" to blend the schools with business and industry in collaborative programs,
- b) "staff development" to share existing and successful programs, and
- c) "demonstration models" to continue to pursue new solutions.

Local planning grants targeted at the dropout and potential dropout in different size communities would be one approach to addressing the issue that would stimulate local involvement—a much needed ingredient to program implementation and continuance.¹⁸

Service Agency Ties

Dropouts out of school is a complex problem often caused by a multitude of factors (pregnancy, work, low academic performance, feelings of not belonging or having success, drugs, juvenile delinquency, physical and psychological abuse, personality conflicts, etc.). Consequently, students often need support help that goes beyond the scope of school programs.

Existing alternative schools and programs demonstrate that a linkage of different resources is necessary to help students to stay in and/or succeed in school. This implies that vocational legislation needs to encourage ties with other existing legislation to demonstrate that comprehensive services can and should be provided.

Existing information on teenage pregnancy serves well to emphasize the need for linkages and, as well, serves as a critical area for targeted assistance to help teenage parents to complete school. Evidence suggests that interventions that combine sex education and life options (jobs) can stem pregnancy and dropout rates among teenage girls. As well, job training and placement can diminish the likelihood of a second pregnancy for teen mothers and the provision of onsite school-based health clinics can reduce pregnancy rates up to 50 percent. This information coupled with the facts that over 50 percent of teenage mothers and 40 percent of teenage fathers do not graduate from high school and would suggest that teenage parents, especially those that have dropped out, be targeted for assistance within vocational legislation (9).

The local planning grant idea mentioned earlier for business and industry collaboration could also serve to stimulate collaboration between service agencies and schools of all types. Local planning grants in the area of teenage parenting for instance, could help stimulate linkages for creative programming. Linkages for other services could include drug services, substitute parenting for dropouts with one or no parents, child abuse, mental health, etc.

Basic Skills

The basic skill levels of high school dropouts average significantly lower than those of completers. The average performance potential being near the twenty-fifth percentile or at a grade equivalence level of 5.4. Frequently, potential dropouts who perform poorly in academics are counseled into vocational subjects with the thinking being that the vocational subjects are more relevant and more manageable. This process in turn has helped to lower the basic skill level of vocational students (average performance between the thirty-fifth and fortieth percentiles or about one-half a standard deviation unit behind the average for all secondary students or rough equivalent to the attainment of general students).¹⁶ Consequently, low basic skill levels offer a challenge to vocational education and to all of education, especially since basic skills are essential to occupational success and successful integration into all aspects of society.

Dropouts, when and if they return to the education setting, do so for skill training.² As well, vocational education serves to retain students in school. Thus, it appears that basic skills training could be incorporated with vocational training a great deal more to help improve retention and the basic skills of dropouts; the idea being that vocational education activity can help motivate students to improve basic skills.

Legislation should be considered that would target funds at fostering improvement in basic skills instruction in vocational programs at the local level, and concurrent research grants to study the impact of such activity on dropouts and potential dropouts. New information in this area could lead to more balanced curriculums in local schools regarding academics and vocational education and reduced dropout rates.

Rural Dropouts

Dropouts are not only characteristic of large schools but are very prevalent in middle-size to small schools. Most of these dropouts have no access to alternative programs or schools to help them complete a high school education. Present economic trends have discouraged large and small school districts from providing the alternative programs. Possibly the only option for the dropout is to prepare for and take the General Education Development (GED) test. However, the GED is not perceived as a viable alternative for all dropouts because it is highly academic oriented.

Dr. Dale Parnell's call for collaborative programming between secondary and post-secondary education institutions to better serve the "neglected majority" lends itself to the rural and middle-sized school dropout dilemma. More innovative programming on blending community colleges with local schools for broad area services to serve dropouts and potential dropouts shows a great deal of promise. Legislative action to promote the planning, development and sharing of such programming could be a significant contribution to the welfare of the country.

Continuing Support

The potential dropout offers challenges to vocational education that are different than the dropout. The potential dropout is still in school and is still looking for some meaning to education. Some are still trying to succeed. The population is at least as large as the dropout population.

Most students elect to leave school between the grades of 7 and 12 or after they reach the age of 16. However, some dropout reports indicate that the age of dropping out is becoming younger. This situation definitely marks a breaking point for intervention strategies. One key challenge for vocational educators is not to help students to decide to leave school but to use the tools of vocational education to help students to remain with school, gain training, and graduate with the potential for high levels of employment. Some federally supported remedial and tutorial programs have been concentrated at the elementary level in hopes of heading off problems in secondary school. However, dropout rates readily confirm that continued assistance is necessary at the secondary level. At this point in time we have reason to believe that participation in vocational education is positively related to high school retention and is successful in helping students to complete high school.^{1, 17, 11, 5, 9} Therefore, vocational education legislation remains a key to providing continuing support assistance to potential dropouts entering junior and senior high schools.

The need for continuing support for students at the secondary level suggests that legislation needs to address the transition of students from one level of education to the next. The whole dilemma cannot be borne by vocational education but significant provisions can be made in vocational legislation to link resources to provide comprehensive programs, allowing for the transition of students from elementary to junior high, junior high to senior high, and senior high to post-school training and competitive work. Vocational legislation can be a catalyst to address the transition issue.

Some resource dollars should be considered for the development of model transition programs for potential dropouts beginning no later than junior high school and continuing through post-school training. As well, some resources for research in the area need to be concurrently provided to study the issue of the impact that transition services can have on reducing dropouts. Transition services necessarily imply vocational counseling, development of individualized vocational plans, work exploration and training, parent involvement, career placements, orientation to vocational programs, etc.

Research and Dissemination

Research on dropouts is scarce. Even at present no common definition of the term has been accepted throughout the states on which data collection can be based to identify the magnitude of the dropout population. No organization has established a clearinghouse of information or organized a data collection system to look closely at the dropout situation. Our best information in vocational education that is available to deal with planning rests on a few studies and needs to be expanded in order to establish more specific and appropriate courses of action. If no other action is taken in federal legislation we should, at minimum, establish resources to collect information, conduct research, and disseminate information to states and local planning personnel regarding services for the dropout and potential dropout.

**Sources of Information That May Be Helpful In
Establishing Specific Direction for
Federal Legislation for Serving
Dropouts and Potential Dropouts In Vocational Education**

- 1) Batche, Catherine. *Indicators of Effective Programming for School To Work Transition Skills Among Dropouts*. Illinois State University, 1984. ED 246 235.
- 2) Boyer, Ernest. *High School—A Report On Secondary Education In America*, 1983. Pages 244-248.
- 3) Finn, Chester E. "A Fresh Option for the Non-College-Bound." Phi Delta Kappan, November, 1986.
- 4) Hamilton, S. "Excellence and the Transition From School To Work". Phi Delta Kappan, November, 1986.
- 5) Hodgkinson, Harold L. *All One System*. The Institute for Educational Leadership, Inc., June, 1985.
- 6) Institute for Responsive Education. *The Dropout Problem: What Can Schools Do About It?* Equity and Choice, Fall, 1986.
- 7) McDill, E., Natriello, G. and Pallas, A. *Raising Standards and Retaining Students: The Impact of the Reform Recommendations on Potential Dropouts*. VSP Industries, Baltimore, MD, 1985.
- 8) Natriello, Gary. *School Dropouts: Patterns and Policies*. Teachers College, Columbia University, New York, 1987.
- 9) National Coalition of Advocates for Students. *Barriers to Excellence: Our Children at Risk*. Boston, MA, 1985.
- 10) National Foundation for the Improvement of Education. *A Blueprint for Success*. 1986.
- 11) Parnell, Dale. *The Neglected Majority*. American Association of Community Junior Colleges, 1985.
- 12) Peng, S. "High School Dropouts: Preliminary Results From the High School and Beyond". Survey paper presented at the annual meeting of the American Educational Research Association, Montreal, Canada, 1983.
- 13) Rumberger, R. "Dropping Out of High School: The Influence of Race, Sex, and Family Background". American Educational Research Journal, 1983. Pages 199-220.
- 14) Smith, G., Gregory, T., Pugh, R. "Meeting Student Needs: Evidence For the Superiority of Alternative Schools". Kappan, April, 1981.
- 15) Weber, J. and Lacey, C.S. *The Dropout*. Research and Development Services No. 236. The National Center for Research In Vocational Education, 1983.
- 16) Weber, James. *Vocational Education and Its Role In Dropout Reduction*. The National Center For Research In Vocational Education, 1986.
- 17) Wehlage, G. and Rutter, R. *Dropping Out: How Much Do Schools Contribute To the Problem? School Dropouts: Patterns and Policies*. Teachers College, Columbia, University, 1987.
- 18) Willis, A.D. *Students at Risk: A Review of Conditions, Circumstances, Indicators, and Educational Implications*. North Central Regional Educational Laboratory, 1986.

LETTER

October 23, 1987

L. Allen Phelps
115 Education Building
University of Illinois
1310 South Sixth Street
Champaign, IL 61820

Dear Allen,

Thank you for your note concerning the federal hearing for reauthorization. I will not be able to attend the convention this year, but would like to submit a statement of our thoughts concerning the CARL PERKINS ACT.

As Chairperson of the Special Needs Department, I have intensively studied the legislation and have attempted to implement the provisions into our program of service to the disadvantaged and handicapped students of Augusta Tech. It is an excellent guide to follow, for definite provisions are given for the specific areas of need. Without these mandates, many educational programs would overlook the needs of this special population. Not only does the law give validity to the services we provide, but it also becomes a catalyst for needed and desired changes in our program.

One specific change that has resulted in our department is the development of a segment of instruction designed to meet the mandates addressed in Title II, Sec. 204. A description of this part of our service effort is included (Orientation — The Answer). This is an attempt to give self assessment and occupational decision making assistance to our D and H students. We enroll approximately 150 students with this classification every quarter, so we feel the effort is timely and valuable.

The CARL PERKINS ACT has helped us bridge the gap for our students to make it possible for them to choose a suitable field and to successfully receive the vocational education. Thus, they become employable.

Ruth Gillespie, Chairperson
Career Development Center
Augusta Technical Institute
Augusta, Georgia

**Position of the National Association of Vocational
Assessment in Education (NAVAE)
Reauthorization Considerations for the Carl D. Perkins
Vocational Education Act**

The Carl D. Perkins Vocational Education Act has fostered many new opportunities for special needs students within vocational education programs. However, new opportunities also bring new problems. The issues and recommendations presented in this statement are a direct result of discussions among practitioners from across the country, discussions which repeated the same issues and concerns regarding effective implementation of the Perkins Act. Other recommendations are offered in response to the American Vocational Association Reauthorization Proposal, Draft #5. It is intended that the issues presented in this paper generate additional discussion and help to create new reauthorization of the Perkins Act.

The following issues and recommendations are not listed in any priority sequence.

1. The assessment assurance in Section 204(c) requires that students receive an assessment of their abilities, special needs, and interests as they relate to success in vocational programming. A letter from the Office of Vocational and Adult Education (U.S. Department of Education) to educators in Pennsylvania clarified that "assessment" could take place prior to students enrolling in vocational education, however the nature or format for the "assessment" was not stipulated.

Recommendation: Language be included in either the statute or the accompanying report to define vocational assessment and to clarify that assessment is an ongoing process for special needs students and that special milestones in transition may require additional assessment information; milestones refer to students' movement into vocational education (e.g. into vocational exploration, specific skill training, work experience), their movement from secondary education to post-secondary or into the labor market, and at specific times during their participation in vocational education programming. In other words, it is suggested that educational systems be required to document the vocationally relevant assessment which occurs prior to students enrolling in vocational education, during their participation to monitor their progress and to make necessary instructional adjustments, and, finally, as they are preparing to make the transition from vocational programming at the secondary and/or post-secondary level to the workforce.

Recommendation: Language include that vocational assessment results should be used to develop the vocational components of students' personal vocational education plans and to assist the instructional efforts of vocational educators and support personnel for individual students. Also, that assessment results contain more than screening data, so that specific curricular and instructional modifications can be based on the results.

Recommendation: Language stipulate that students preferred style of learning be included as a part of their "special needs assessment."

2. Local education agencies have experienced difficulty in planning and implementing the assessment assurance of the Act.

Recommendation: There should be some type of incentive or language which authorizes that a percentage of the special needs set-asides be used for on-going, comprehensive training and technical assistance of the personnel who will be responsible for implementing the assessment and supplemental special services for special needs students. The current flow through of 100% set-asides to local education agencies (LEAs), should be reduced so that state personnel can utilize some funds for statewide activities.

Recommendation: At least 5% from the set-asides received by a state should be authorized and allocated for use in activities, for technical assistance, leadership development in the areas of the Perkins assurances, product development, and pilot demonstration projects which are tied to or are accompanied by research projects. It is suggested that staff development activities be tied as much as possible to the unique conditions and problems of individual local education agencies. In other words, that statewide conferences not occur for the sake of "spending the money" or to expose professionals to a wide variety of topics, rather professionals need and want specific skill training.

Recommendation: In state or local educational agencies where trained, qualified and experienced vocational assessment personnel exist, every provision should be made to involve those individuals in the planning and implementation processes for vocational assessment programming.

3. Under current legislation, it is unclear whether post-secondary programs must incorporate vocational assessment and supplemental service activities.

Recommendation: Language include post-secondary programs under the four student assurances (assessment, supplemental services, counseling for career development, and transition planning and preparation.)

4. Services to handicapped students are more likely to be effective than services to disadvantaged students. This is due in large part because the disadvantaged students do not have the safeguards and assurances that P.L. 94-142 provides to handicapped students. As a result, no formal framework or structure for services or personnel who are specifically trained and assigned to provide those services exist for disadvantaged students.

Recommendation: Language in vocational education legislation stipulate that disadvantaged students should be served in least restrictive environments according to the nature of their disadvantaging conditions. Also, language state that disadvantaged students be provided services that follow a sequence of assessment, individualized programming, support, and follow-up services which are conducted or monitored by a specified professional who has these services as his or her primary responsibilities. Further, language should be clear in stating that disadvantaged students have personal vocational educational plans which are monitored and revised at least once each school year.

Recommendation: The NAVESNP and AVA legislative committees and leadership monitor and provide input into other legislation which impacts on the overall education of disadvantaged students, such as Chapter One, Job Training Partnership Act, Drop-out Prevention, welfare and reform legislation. Every effort should be made to incorporate the ideas presented above in other educational legislation and vocational education should be cross-referenced in pieces of legislation that would support the vocational education efforts for these youth and adults.

5. There is insufficient support for the guidance and counseling needs of special needs students.

Recommendation: The current Title III, Part D, Comprehensive Career Guidance and Counseling Programs should be appropriated funds that are necessary to conduct such services. Although it is not the optimal solution, perhaps, this Part should be incorporated into the current Title II portion of the Act with an increase in appropriations for that Title. Because Part D will no longer represent a separate line item in budgetary considerations, it may have more possibility for receiving funding.

6. Many professionals have voiced concern over the threatened or actual closing of effective alternative programming for disadvantaged students which are set up as "separate" programs. Such programs are designed for potential high school drop-outs, former drop-outs who want to re-enter high school and vocational education, and students who have been expelled from regular school programs, but who wish to, or, due to age, are obligated to continue their educations. With the long-awaited current emphasis on "at risk" students, many educators find that their most innovative or potentially successful ideas can not be carried out due to the priority on "mainstreamed" services and instructional programming.

Recommendation: Local education agencies should be given the discretion to use a portion of their set-aside for disadvantaged students for establishing and supporting vocational support service programming options which may require the isolation of these students from other vocational education students in "mainstreamed" or integrated classes.

Recommendation: At least 2% of the disadvantaged set-aside of 22% should be reserved for drop-out prevention programming efforts. However, it need not be mandatory that LEAs use their disadvantaged allocation in this manner.

7. AVA has recommended a reduction in set-asides for special needs populations. Comments from professionals note the lack of sufficient funds to develop and implement programs and services for special needs students. Several comments have identified the extreme insufficiency of funds for juvenile and adult offenders. The lack of funds is so great that the intents of the Act can not be met.

Recommendation: The set-asides should remain at their current percentages for handicapped students—10% and for disadvantaged students—22%. Reductions for other populations should coincide with the AVA proposal:

Adults needing training and retraining—11% from 12%
Single parents and homemakers—7.5% from 8.5%
sex biased stereotyping—3% from 3.5%

These reductions should be made *only if* specific programs and activities for potential dropouts can be funded at 100% for and additional 2%.

Set-asides for juvenile and adult criminal offenders should be increased by, at least, .50% so that they would receive 1.50% over the 1% they currently are allowed. Language should also stipulate that funds from the 22% for disadvantaged youth and/or from the 11% for adults needing training or retraining can be used for criminal offenders at the LEA's discretion—up to 2% in either category.

The total appropriations for Title II should remain at 57%.

8. Limited English Proficient (LEP) students have needs in vocational education that are similar in some cases to low incidence handicapped students. For instance, often these individuals (especially the adults) are in dire need of gaining training and employment; this is particularly the case with recent immigrants who seem to congregate in geographic pockets throughout the United States. To date, inadequate and inappropriate assessment techniques, instruments, and strategies exist to meet the needs of these individuals.

Recommendation: Research and product development funds and projects be made available via the Secretary's discretionary funds, through the National Center for Research in Vocational Education or its successor(s), or by using state funds (if they are made available by implementing something similar to the recommendation contained in Item #2). Dissemination requirements should be built into such projects.

9. Over 50% of the Perkins Act programming and funding are targeted toward special needs populations. Yet, due to the fiscal reductions for administrative costs and the unhealthy economy in many states, a number of states have reduced or eliminated the services (e.g. technical assistance, monitoring) and leadership that had been and needs to be provided by state special needs administrators. Also, at the federal level the imbalance of personnel assigned to special needs as compared with other staff assignments is obvious. The time and efforts by the few program specialists at the Office of Vocational and Adult Education in the Department of Education are further hampered by the fact that they have additional responsibilities that are not directly related to facilitating and enhancing services for special needs individuals.

Recommendation: Language in the Act stipulate that every state and territory must have at least one (preferably more) professional staff member who has as his or her sole responsibility the administration, overseeing, and monitoring of special needs programming as they pertain to implementation of the Act. The individual who serves in this role should have appropriate qualifications and experience for serving these populations. The language for this staff person could be patterned after the language for equity coordinators which exists in the current Act.

Recommendation: The responsibility for monitoring special needs students and programs which AVA has recommended should fall to the equity coordinator in each state, should be assigned to the Special Needs Administrator(s). Coordination between the two should occur, however.

Recommendation: The OVAE assign additional personnel to assist with special needs concerns and facilitation of special needs assurance within the Perkins Act.