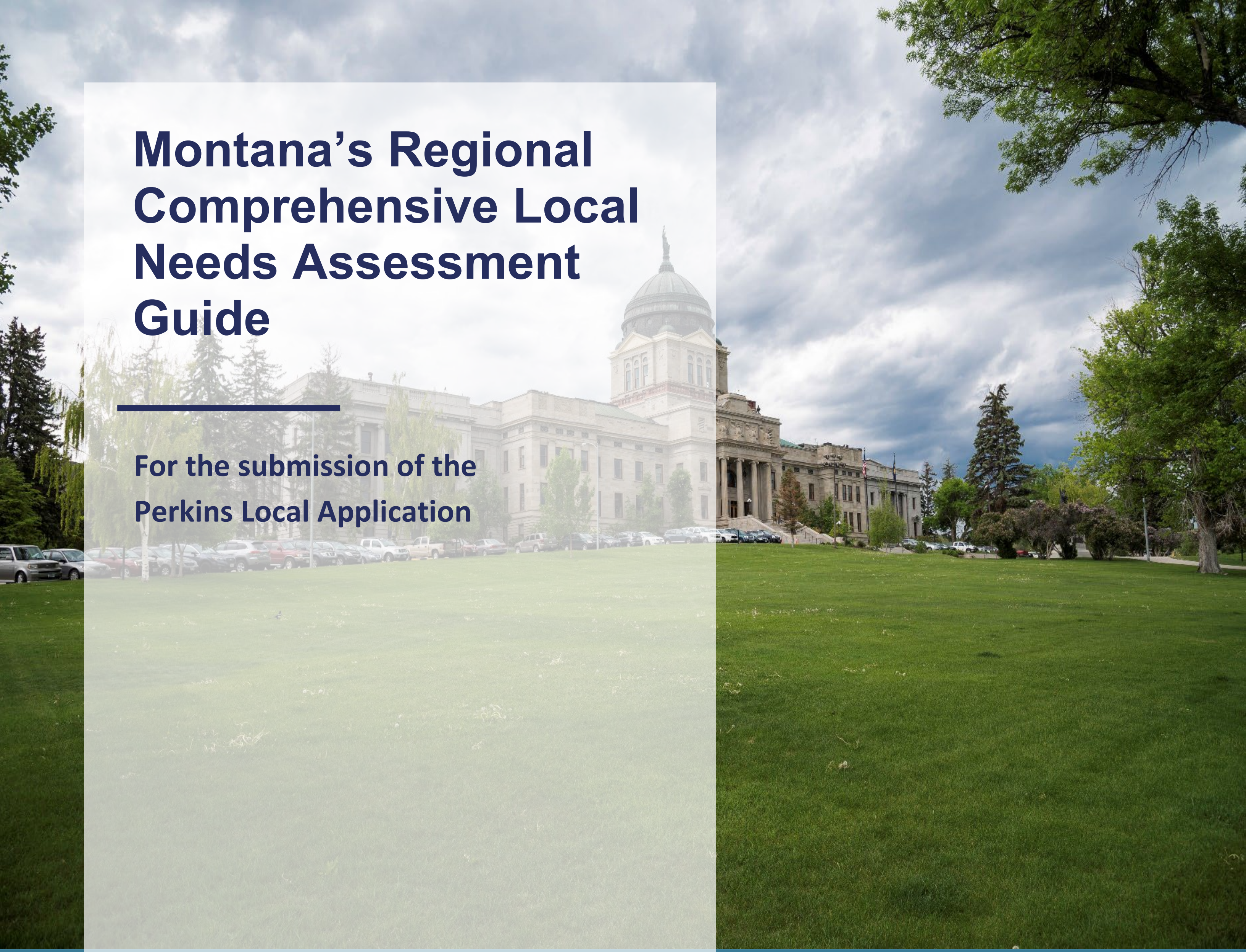
Montana's Regional Comprehensive Local Needs Assessment Guide

For the submission of the Perkins Local Application



Fall 2025

Learning that works for Montana CTE™

MONTANA OFFICE OF PUBLIC INSTRUCTION

OFFICE OF THE COMMISSIONER OF HIGHER EDUCATION

MONTANA UNIVERSITY SYSTEM

Introduction

All local applicants must conduct a comprehensive local needs assessment (CLNA) and update it at least every two years. A CLNA is required of all secondary, post-secondary, and consortium applicants. The law states:

> *"To be eligible to receive financial assistance under this part, an eligible recipient shall – (A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and (B) not less than once every 2 years, update such comprehensive local needs assessment." SEC 134(c)*

This guide will provide Perkins Local applicants with a framework from which to structure their approach to the local needs assessment efforts by translating the legal language into actionable steps that complete the requirements and engage stakeholders in thoughtful program improvement.

This document was created with resources from Advance CTE and Association of Career Technical Education (ACTE).

Why a Comprehensive Local Needs Assessment?

In addition to being a requirement for all local applicants to receive Perkins Local funding, the needs assessment is a valuable tool that drives your local application development and future spending decisions. This is a chance to take an in-depth look at your entire local and regional CTE system and identify areas where targeted improvements can lead to increased opportunities for student success. The needs assessment, if implemented thoughtfully, can also be a powerful opportunity to engage stakeholders in a common understanding and vision for the future of CTE in your community.

What are the Benefits of the CLNA?

When the CLNA is complete, you will have a set of findings that gives an accurate depiction of local CTE programs. This creates an opportunity to:

- ◊ Help all students achieve career success
- ◊ Align Perkins budget with economic priorities and ensure programs are validated by local/regional workforce needs
- ◊ Ensure that you are serving all learners in Montana and better direct resources toward programs that lead to high-skill, high-wage, and in-demand occupation and activities that address opportunity gaps
- ◊ Provide a structured way to engage key stakeholders to ensure quality and impact of CTE programs and systems

There are four essential features that make a needs assessment comprehensive:

1. Needs-driven and context-specific approach
2. Thorough data collection and analysis
3. Stakeholder engagement
4. Collaborative identification of improvement needs

SIX KEY ELEMENTS OF THE CLNA

Element One: Student performance on required federal accountability indicators

Element Two: Program size, scope, and quality

Element Three: Progress towards implementation of CTE programs of study

Element Four: Improving recruitment, retention, and training of CTE professionals, including underrepresented groups

Element Five: Progress toward improving student access to quality CTE programs

Element Six: Alignment of programs to labor market needs

The six key elements of the needs assessment outlined in the law can be divided into three main categories: student performance, labor market alignment, and program implementation. No single area in the law is more important than another. To meet federal requirements, your needs assessment must cover all of the key elements.

Conducting a Comprehensive Local Needs Assessment

Step One: Prepare

Develop a Timeline

A thorough CLNA process will take a few months to complete, and it must precede the local application process. The process will be completed every two years and will include a regional CLNA meeting in the fall prior to the local application due date. Worksheets to be completed at the local level are required to be submitted and/or brought to the regional meetings.

Identify Resources and Stakeholders

You can leverage many activities in which you are already engaged to help build the needs assessment. Information and consultation activities do not have to be new or different from what you may already be doing. The data you collect, the relationships your school has formed with industry and community partners, and the processes you engage in for curriculum and program development, revision and approval are all relevant to the foundation for the needs assessment.

Step Two: Explore

Identify Existing Data

Data may be collected in various ways from various sources. The Office of the Commissioner of Higher Education (OCHE), The Office of Public Instruction (OPI), the Department of Labor and Industry (DLI), and local government and economic development organizations are common sources for needs assessment data. Begin exploring what readily available and relevant data sources exist and involve stakeholders in identifying data sources. The most common sources of helpful data include:

- Perkins Report Cards issued by OCHE and OPI
- Labor Market Information provided by the DLI
- Institutional assessment results, community demographics, student and teacher retention, and persistence data
- Data from classrooms and programs
- Surveys, interviews, and/or focus groups that gather information from diverse groups such as parents, educators, students, and community members
- Relevant institutional policies, plans, and allocations of resources

Determine Additional Data Needed

You may need to collect some additional data as well. The goal for data collection is to gain knowledge about your institution and regional needs to better understand how to serve them. For example: consider what your institution needs to understand retention issues of a specific subgroup of students. You might begin by seeking opinions from students in that subgroup, student services staff, faculty, and community stakeholders who are members of that population subgroup.

Your needs assessment may benefit from data gathered using some of the following activities:

- Environmental scanning (gathering information about what other institutions are doing, what is happening around the region, etc.)
- Document and/or report review
- Focus groups/interviews
- Surveys
- Observation

Step Three: Assess

Engage Stakeholders

Review and discuss data with your identified stakeholders. In conducting the comprehensive local needs assessment under subsection 134(c), and developing the local application described in subsection 134(b), eligible recipients must involve a diverse body of stakeholders, including, at a minimum:

- Representatives of CTE programs from both secondary and post-secondary institutions including:
    - Teachers, instructors and faculty
    - Career guidance and advisory professionals
    - Administrators, principals

    - Specialized instructional support personnel and paraprofessionals
- Representatives of regional economic development organizations and local business and industry
- Parents and students
- Representatives of special populations
- Representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at-risk youth
- Representatives of Indian Tribes and Tribal organizations in the State, where applicable

Tools for Obtaining Public Input

Tool	Number of Participants	Best Suited For
Interviews	Individual or Small Group	Learning about individual perspectives on issues
Focus Groups	Small Groups (15 or fewer)	Exploring attitudes and opinions in depth
Study Circles	Small Groups (5-20)	Information Sharing and focused dialogue
Public Meetings/Hearings	Large Groups	Presenting information to and receiving comments or feedback from the public
Public Workshops	Multiple Small Groups (8-15 in each group)	Exchanging information and/or problem-solving in small groups
Electronic Survey	Varies; Can be used for targeted small groups or larger populations	Data collection and analysis
Virtual Meetings	Individual, Small or Large Groups	Receiving real-time quantitative feedback to ideas or proposals. Providing accessibility to remote participants.

GUIDANCE TO ASSESS ELEMENT ONE: Student performance

The CLNA shall include an evaluation of student performance including special populations and each subgroup. The CLNA must contain an evaluation of CTE concentrators' performance on each of the core performance indicators. **Perkins V, Section 134(c)(2)(A)** states the needs assessment must include: *An evaluation of the performance of the students served with respect to State determined and local levels of performance, including an evaluation for special populations and each subgroup described in section 1111 of the ESEA*.

Materials to Review

Your annual Perkins Report Card as provided by OCHE and OPI, which includes Perkins performance data for all current core indicators for the past year, disaggregated by CTE program area and subpopulation groups (special populations) including:

- Gender
- Race and ethnicity
- Migrant status
- Individuals with disabilities
- Individuals from economically disadvantaged families, low-income youth and adults
- Individuals preparing for nontraditional fields
- Single parents including single pregnant women
- Out of work individuals
- English-language learners
- Homeless individuals
- Youth who are in or who have aged out of the foster care system
- Youth with a parent who is on active-duty military

Comparison data for 'all' students:

- Secondary students – Statewide assessment data comparisons for:
    - Graduation rate
    - Academic achievement
    - Placement
    - The percentage of CTE concentrators in CTE programs leading to nontraditional fields
    - Concentrators participating in a work-based learning experience
- Postsecondary – Institutional data comparisons for:
    - Credential attainment
    - Placement
    - The percentage of CTE concentrators in CTE programs leading to nontraditional fields

Stakeholders to Consult

- All stakeholders as required by law, particularly administrators, secondary teachers, postsecondary faculty, and representatives of special populations
- Data staff

Questions to Ask

- How are students in my CTE programs performing on federal accountability indicators in comparison to non-CTE students?
- How are students from special populations performing in my CTE programs in comparison to students without identified special needs?
- How are students from different genders, races, and ethnicities performing in my CTE programs?

- Where do the biggest gaps in performance exist between subgroups of students?
- Which CTE programs overall have the highest outcomes, and which have the lowest?
- Are there certain CTE programs where special populations are performing above average? Below average?
- What are the potential root causes in differences in my CTE programs?
- What strategies are helping students overcome barriers to learning that result in lower rates of access to, or performance gaps in, the courses and programs for special populations?
- What programs are designed to enable special populations to meet the local levels of performance?
- What activities help prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency?

GUIDANCE TO ASSESS ELEMENT TWO: Program size, scope, and quality

Perkins V, Section 134(c)(2)(B)(i) states the needs assessment must include: *A description of how career and technical programs offered are sufficient in size, scope, and quality to meet the needs of all students served.*

What are size, scope, and quality? These definitions are important to ensure funds are used to drive quality, equitable, and impactful programs.

For Montana, definitions of size, scope, and quality are:

Criteria for Size

Secondary eligible recipients must offer a minimum of approved Montana Career Pathways based upon student enrollment as follows:

- Large districts (Class AA) must offer three (3) Montana Career Pathways approved by program specialists.
- Medium districts (Class A/B) must offer two (2) Montana Career Pathways approved by program specialists.
- Small districts (Class C) must offer one (1) Montana Career Pathway approved by a program specialist.

LEAs may offer additional CTE programs beyond the required number of Pathways. If the program meets the requirements of Montana guidelines, it is eligible for Perkins funding.

Postsecondary degree/career programs approved by the Montana Board of Regents or specifically approved by the State are eligible for Perkins funding.

Criteria for Scope

Indications of adequate scope in a Perkins funded **secondary** CTE program include the requirements for a rigorous Montana Career Pathway (program of study), opportunities for dual credit, online CTE courses, work-based learning, and/or Industry recognized credential opportunities.

Postsecondary programs must include rigorous, coherent CTE content aligned with challenging academic standards culminating in a certificate or degree. Links must exist between the secondary and postsecondary programs of study.

All Perkins funded programs must be aligned with business and industry as validated by a local business advisory committee.

Criteria for Quality

Eligible **secondary** districts have the minimum number of Montana Career Pathways as determined by their district size, and all CTE funded programs must comply with the Montana CTE requirements and guidelines publication.

Eligible **postsecondary** recipients offer students the opportunity to participate in programs of study that lead to two of the following three: high-skill, high-wage and/or in-demand occupations. Postsecondary programs must include rigorous, coherent CTE content aligned with challenging academic standards.

Guidance provided to **all secondary and postsecondary** LEAs on high-skill, high-wage and in- demand are:

- High-skill – requiring a degree or credential in addition to or beyond a high school diploma.
- High-wage – 60% and above the median income per county/city/DLI region/state/etc.
- In demand – the Montana Department of Labor and Industry argues that all industries and careers are currently in demand in Montana.

Materials to Review

Size:

- Total Number of program areas, number of courses within each program area
- Total number of students who could be served by the eligible recipient, aggregate and disaggregate CTE course enrollments, and CTE participant and concentrator enrollments for the past several years, aggregated and disaggregated
- Number of students applying to your programs (if applicable)
- Number of students on waiting lists (if applicable)
- Survey results assessing student interest in particular CTE programs

Scope:

- Documentation of course sequence and aligned curriculum
- Credit transfer agreements
- Data on student retention and transition to postsecondary education within a program of study
- Descriptions of dual/concurrent enrollment programs and data on student participation
- Data on student attainment of credentials and articulated credit

- Curriculum standards that show depth and breadth of programs
- Opportunities for extended learning with and across programs of study

Quality:

- All materials listed throughout this guide
- Curriculum standards and frameworks
- Lesson plans
- Assessments
- Partnership communication and engagement activities
- Safety requirements
- Work-based learning procedures
- Career and Technical Education Student Organizations (CTSO) activities and alignment
- Data collection mechanisms
- Program improvement processes

Stakeholders to Consult

- All stakeholders as required by law, particularly administrators, secondary teachers, postsecondary faculty, career guidance and advisement professionals, parents, students, and representatives of special populations
- Data staff

Questions to Ask

- Has the Local Application been developed consistent with the results of the CLNA?
- Is there a plan to address performance gaps identified by the CLNA?
- Is enrollment sufficient to support the program? If not, how do you recruit for it?
- Are you able to offer enough courses and sections within programs? Are there any courses that students have difficulty enrolling in because they are regularly full? How can this be addressed?
- Are all students who want to take a CTE course able to do so?
- Are there any gaps in admission for students in special populations or based on different genders, races, and ethnicities?
- Do you provide organized career exploration and guidance activities to all students?
- Are equipment and supplies chosen in consultation with key stakeholders?
- Are facilities of adequate size to accommodate CTE program requirements?
- Are required stakeholders in place for consultation on Perkins applications?
- Do advisory committees include representatives from business and industry? Do they include representatives from special populations?
- Do all students in CTE programs have an opportunity to participate in a work-based learning experience?
- Are there labor market data that support this program's continuation for the next five years?
- Are instructors provided with professional development opportunities to remain current in their fields?

GUIDANCE TO ASSESS ELEMENT THREE: Progress towards implementation of CTE programs of study

Perkins V, Section 134(c)(2)(C) states the needs assessment must include: *An evaluation of progress toward the implementation of career and technical education programs and programs of study.*

Perkins V, Section 3(41): Program of Study. *A coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level that:*

- Incorporates challenging State academic standards;
- Addresses both academic and technical knowledge and skills, including employability skills;
- Progresses in specificity (beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction);
- Has multiple entry and exit points that incorporates credentialing;
- Culminates in the attainment of a recognized postsecondary credential.

Perkins funds can only be used to support programs that, at minimum, comprise a complete coordinated plan of study.

Materials to Review

- Documentation of course sequences and aligned curriculum
- Curriculum standards for academic, technical, and employability skills
- Credit transfer agreements
- Data on student retention and transition to postsecondary education within the program of study
- Descriptions of dual/concurrent enrollment programs and data on student participation
- Data on student attainment of credentials and articulated credit
- State-recognized program of study rubric
- Advisory committee notes/minutes
- Notes on industry participation

Stakeholders to Consult

- All stakeholders as required by law, particularly administrators, secondary teachers, postsecondary faculty, and career guidance and advisement professionals
- Representatives of special populations, including people experiencing poverty, people with disabilities, people of color, and representatives of Indian tribes and tribal organizations

Questions to Ask

- How fully are my programs aligned and articulated across secondary and postsecondary education?
- Do my programs incorporate relevant academic, technical, and employability skills at every learner level?
- Do I have credit transfer agreements in place to help students earn and articulate credit?
- Are my students being retained in the same program of study?
- Do students in the programs of study have multiple entry and exit points?

- Are students in my programs earning recognized credentials of value? Which ones?
- Are secondary students in my programs earning dual/concurrent enrollment credit?

GUIDANCE TO ASSESS ELEMENT FOUR: Improving recruitment, retention, and training of CTE professionals, including underrepresented groups

The CLNA will also assess the educator workforce in your programs. This includes teachers, instructors, and faculty as well as specialized instructional support personnel, paraprofessionals, and career guidance and advisement professionals. An important part of this assessment asks participants to look at their current staff pipeline and what strategies are taken to recruit and retain quality staff. It also asks to review the demographics of staff to determine if they match the demographics of the community.

Perkins V, Section 134(c)(2)(D) states the needs assessment must include: *A description of how the eligible recipient will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions.*

Note: A new, formal definition of “Professional Development” is introduced in Perkins V. This definition is modeled off the professional development definition in the Every Student Succeeds Act (ESSA) but contains more CTE-relevant language. “Professional Development” is defined as: Activities that are an integral part of strategies for providing educators with the knowledge and skills needed to enable students to succeed in CTE, and that are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job embedded, data-driven, and classroom-focused, and to the extent practicable evidence-based.

Materials to Review

- State and/or local policies on educator certification and licensing
- Data on faculty, staff, administrator, and counselor preparation; credentials; salaries and benefits; and demographics
- Description of recruitment and retention processes
- Descriptions of professional development, mentoring, and externship opportunities
- Data on educator participation in professional development, mentoring, and externship
- Findings from surveys/focus groups of educators’ needs and preferences
- Data on educator and staff retention
- Information about teacher/faculty shortage areas and projections of future staffing needs

Stakeholders to Consult

- All stakeholders as required by law, particularly administrators, secondary teachers, postsecondary faculty, career guidance and advisement professionals, and representatives of special populations

Questions to Ask

- How diverse is the staff at my school? Does it reflect the demographic makeup of the student body?
- What processes are in place to recruit and induct new educators and staff? Are these processes efficient and effective, especially for educators coming from industry?
- Are all the educators teaching CTE programs adequately credentialed?
- Does my school offer regular, substantive, relevant professional development opportunities?
- What professional development offerings are most highly rated by participating staff?
- What do educators report as needs and preferences for professional development, benefits, and supports?
- In what subject areas does my school need to develop or recruit more educators?

GUIDANCE TO ASSESS ELEMENT FIVE: Progress toward improving student access to quality CTE programs

In this section, the law requires eligible recipients to evaluate their progress in providing improved access to CTE programs, particularly CTE programs that lead to strong positive outcomes for learners, and in providing CTE in ways that maximize success for special populations, especially in programs leading to high-skill, high-wage or in-demand industry sectors or occupations.

Materials to Review

- Promotional/informational materials
- Recruitment activities for special populations
- Career guidance activities for special populations
- Processes for providing accommodation, modifications, and supportive services for special populations
- Information on accelerated credit and credentials available for special populations
- Procedures for work-based learning for special populations
- Data on participation and performance for students from special populations
- Findings from the root causes and strategies analysis from the student performance component
- Findings from surveys/focus groups with students, parents (if applicable), and community organizations that represent special populations

Stakeholders to Consult

- All stakeholders as required by law, particularly administrators, secondary teachers, postsecondary faculty, career guidance and advisement professionals, parents, students, and representatives of special populations

Questions to Ask

- Which population groups are underrepresented in our CTE programs overall and in particular program areas? Overrepresented?
- Are there additional enrollment discrepancies related to high-wage, high-skill occupations?

- What barriers (such as prerequisites/admission requirements, transportation, childcare or scheduling) prevent certain populations of learners from accessing your programs? Which student groups are most affected by these barriers?
- How are special population groups performing in our CTE programs?
- What accommodations, modifications, and supportive services do consortium member institutions currently provide to ensure the success of special population groups? Which ones are most effective? Which ones are underutilized?
- Do students have access to career guidance that is comprehensive and unbiased?
- What additional accommodation, modifications, and supportive services would help ensure access for all students in our CTE programs?

GUIDANCE TO ASSESS ELEMENT SIX: Alignment of programs to labor market needs

Perkins V continues to focus on aligning programs of study to high-wage, high-skill, and high-demand occupations. In the local comprehensive needs assessment, eligible recipients will analyze how CTE programs meet workforce and economic development needs. OCHE and OPI have worked with DLI to provide a Career Cluster and Pathway Occupation Projections Dashboard. The local applicant will also need to engage with local employers, chambers of commerce, and/or economic development to determine local community workforce needs along with possible emerging needs. The assessment will look at how different resources are used to determine which CTE programs of study are made available for students.

Perkins V, Section 134(c)(2)(B)(ii) states the needs assessment must include: *A description of how career and technical education programs are aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board or are designed to meet local education or economic needs not identified by the local workforce development boards.*

Materials to Review

- The Montana Career Cluster and Pathway Occupation Projections Dashboard
- Results of any available gap analysis on educational outcomes and employment
- Needs (from the state or otherwise commissioned)
- State and locally defined lists of in-demand industry sectors and/or occupations
- State and local labor market information
- Real-time job postings data from online search engines
- Input from business and industry representatives, with reference to opportunities for special populations
- CTE program of study concentrator data from the last three years
- Alumni employment and earnings outcomes from a state workforce agency or findings from a follow-up alumni survey

Stakeholders to Consult

- All stakeholders as required by law, particularly secondary and postsecondary administrators, career guidance and advisement professionals, business and community partners, local workforce investment/economic development boards, and representatives of special populations

Questions to Ask

- Do your programs lead to credentials of value in in-demand industries? How do you know?
- Do your programs feature up-to-date, industry-standard equipment, facilities, curriculum, methods of instruction, and work-based learning opportunities? What more do you need?
- Are your students receiving adequate career guidance, counseling, and individualized academic support?
- Are instructors provided with professional development opportunities to remain current in their fields?
- Are you effectively partnering with employers and educational institutions to ensure that your programs are aligned with industry needs and future academic opportunities?
- Do your programs include embedded industry recognized credentials, internships, apprenticeships, or other work-based learning opportunities?