

## Section 5: Accountability

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### A. CORE INDICATOR PERFORMANCE LEVELS

Perkins funds recipients are being held more accountable and are required to show program improvement each year. A performance accountability system measures performance in four core indicator areas and a fifth will be added under Perkins IV. Baseline performance levels were set in 1999-2000 and the State's postsecondary historical results can be found in Appendix A. ADHE negotiates new performance levels annually with OVAE and the State will negotiate levels with local institutions beginning with program year 2008-09.

Information required to calculate results for performance indicators is submitted by postsecondary institutions using the Perkins Data Submission report due by August 15 of each year. The submission reports enrollment and academic and occupational achievement rates of occupational concentrators from the just-concluded academic year (July 1 through June 30). Instructions for submission of these files can be found online in the *AHEIS Reference Manual for the Student Information System*.

[http://www.adheperkins.com/pdf/ahesis\\_revised2007.pdf](http://www.adheperkins.com/pdf/ahesis_revised2007.pdf)

### B. DESCRIPTION OF NEGOTIATED PERFORMANCE LEVELS

*Postsecondary Concentrator:* A postsecondary student who has declared a major in a less-than baccalaureate level occupational program.

Definitions for many of the terms related to core indicators can be found in Appendix Z and occupations designated as nontraditional are listed in Appendix G- Nontraditional Occupations by CIP Code.

<i>Core Indicator 1P1: Attainment of Academic Skills (Academic Attainment)</i>	
<b>2006-07 Target:</b>	<b>77.28%</b>
<b>Numerator:</b>	Total number of students with 2.0 or greater GPA in academic work
<b>Denominator:</b>	Total number of students who attempted academic work
<b>Data Source:</b>	Institutions report GPA for all academic coursework of occupational concentrators on the Perkins Data Submission

<i>Core Indicator 1P2: Attainment of Vocational Skills (Skill Attainment)</i>	
<b>2006-07 Target:</b>	<b>71.11%</b>
<b>Numerator:</b>	Total number of students with 2.5 or greater GPA in occupational coursework
<b>Denominator:</b>	Total number of students who attempted occupational coursework
<b>Data Source:</b>	Institutions report GPA for all occupational coursework of occupational concentrators on the Perkins Data Submission

<i>Core Indicator 2P1: Diploma/Credential (Completion)</i>	
<b>2006-07 Target:</b>	<b>17.74%</b>
<b>Numerator:</b>	Total number of completers at end of three years
<b>Denominator:</b>	Total number of a cohort of first-time, full-time, award-seeking freshmen enrolled in a given enrollment period
<b>Data Source:</b>	AHDE will establish a cohort using the Perkins Data Submission and obtain completion data from ADHE student database.

<i>Core Indicator 3P1: Placement and Retention (Total Placement)</i>	
<b>2006-07 Target:</b>	<b>77.00%</b>
<b>Numerator:</b>	Number of completers who have been identified as employed in the Arkansas UI wage records in the 3 <sup>rd</sup> quarter after program completion or who were enrolled in Arkansas public higher education in the academic year following program completion
<b>Denominator:</b>	Completers from previous academic year identified by social security number
<b>Data Source:</b>	ADHE will compare completers to postsecondary enrollment and Arkansas UI wage records

<i>Core Indicator 3P2: Placement and retention (Retention)</i>	
<b>2006-07 Target:</b>	<b>81.00%</b>
<b>Numerator:</b>	Number of placed completers who continued to be employed or enrolled in the 3 <sup>rd</sup> quarter following placement.
<b>Denominator:</b>	Completers who were identified as employed in the Arkansas UI wage records in the 3 <sup>rd</sup> quarter after program completion or who were enrolled in Arkansas public higher education in the academic year following program completion
<b>Data Source:</b>	ADHE will compare placements to postsecondary enrollment and Arkansas UI wage records

<i>Core Indicator 4P1: Participation in Nontraditional Programs (Participation)</i>	
<b>2006-07 Target:</b>	<b>19.60%</b>
<b>Numerator:</b>	Male enrollment in female dominated programs plus female enrollment in male dominated programs
<b>Denominator:</b>	Total number of students enrolled in occupational programs
<b>Data Source:</b>	Nontraditional programs are flagged as such and ADHE calculates from records of concentrators submitted on the Perkins Data Submission.

<i>Core Indicator 4P2: Completion of Nontraditional Programs (Completion)</i>	
<b>2006-07 Target:</b>	<b>14.73%</b>
<b>Numerator:</b>	Male completers of female dominated programs plus female completers of male dominated programs
<b>Denominator:</b>	Total number of completers of occupational programs.
<b>Data Source:</b>	Nontraditional programs are flagged as such and ADHE calculates from records of concentrators submitted on the Perkins Data Submission.

### C. PERKINS COORDINATOR RESPONSIBILITY FOR ACCOUNTABILITY DATA

Measuring accountability involves submission of student performance data, actual measurable outcomes of funded activities, and financial reports. While the Perkins coordinator may not be directly responsible for collection and submission of some of the data required, the coordinator is responsible for assuring that other staff is aware of Perkins requirements and associated deadlines. The Perkins Annual Timeline for Program Year 2006-07 contains the major milestones identified below.

#### *Perkins Annual Timeline*

<b>2006</b>	
<b>September 30</b>	<b>Perkins Data Submission from PY 2005-06</b> <ul style="list-style-type: none"> <li>Pell/BIA count from AY 2005-06 is submitted to ADHE. This is used to calculate funding for Perkins PY 2007-08.</li> </ul>
<b>2007</b>	
<b>March-April</b>	<b>Local Funding Determined</b> <ul style="list-style-type: none"> <li>OVAE advises ADWE of PY funding level</li> <li>ADWE/ADHE calculate individual institutions based on Pell/BIA count</li> <li>ADHE advises institutions.</li> <li>Institutions below \$50,000 form consortia.</li> </ul>
<b>May</b>	<b>Annual Plans Submitted</b> <ul style="list-style-type: none"> <li>Program proposal and associated budget submitted to ADHE for approval.</li> </ul>
<b>June</b>	<b>Annual Plans Approved</b> <ul style="list-style-type: none"> <li>State Staff reviews and approves annual plans.</li> </ul>
<b>July 1</b>	<b>Fiscal Period Begins; Funds Can Be Obligated</b> <ul style="list-style-type: none"> <li>First day funds can be spent (if program has been approved)</li> </ul>
<b>August 1</b>	<b>Institutions may request reimbursement.</b>
<b>August 15</b>	<b>End of Year Disposition of Funds due to ADHE</b>

- November 15      Equipment Purchase/Installation Deadline**
- **Equipment must be installed to qualify for Perkins funding**

**Data Charts and Data Summaries provided to local institutions**

**2007**

- February 15      Amendment Deadline**
- Last day to make amendments. New activities or adjustments that exceed amendment threshold must be submitted by this date since funds cannot be obligated without approval.
- February-  
March              Annual Compliance Visits by State Staff**
- June 30            Fiscal Year Closes**
- All funds must be spent or returned. Funds can no longer be encumbered through September 30.
- August 15        End of Year Disposition of Funds Report**
- End of year financial report and return of unspent funds
- August 15        Perkins Data Submission from PY 2006-07**
- Pell/BIA count from AY 2006-07 is submitted to ADHE. This is used to calculate funding for Perkins PY 2008-09 and to calculate core indicator performance levels.
- October            Data Reports Provided to Coordinators by ADHE**
- Based on Perkins Data Submission, Perkins Data Summaries and Perkins Data Charts are provided to coordinators for use in developing activities for PY 2007-08 and to calculate core indicator performance for PY 2006-07.
- November 1      End of Year Performance Report**
- Coordinators submit actual outcomes of funded activities.

***Perkins Data Submission Procedures***

Institutions vary in regard to how data related to Perkins student performance is collected on campus and reported to ADHE. It is the responsibility of the Perkins coordinator to work with the designated institutional data person to assure that data is correct, complete and submitted on time. Instructions for submission of these files can be found online in the *AHEIS Reference Manual for the Student Information System* at [http://www.adheperkins.com/pdf/ahesis\\_revised2007.pdf](http://www.adheperkins.com/pdf/ahesis_revised2007.pdf) A hard copy of the manual is also distributed to all institutional IR departments.

The report is due no later than August 15. As soon as information has been validated, a Perkins Data Summary Report and the Perkins Data Charts are distributed to coordinators for use in preparing the end of year performance report and planning future activities. If the Perkins Data Submission is validated by August, the reports will be distributed to coordinators by October 1.

### *End of Year Performance Report*

Each Perkins funded activity has an expected measurable outcome. By November 1 following the close of the program year, the coordinator is responsible for submitting a report describing whether expected outcomes were achieved, and if not, citing possible reasons for the deficiency. Coordinators may use the Data Summary Reports and Data Charts generated from the Perkins Data Submission or data from other appropriate sources.

### *Financial Report*

Financial accountability is reported annually on the End of Year Disposition of Funds report due August 15. Expenditures are reported by budget category as well as by required and permissive use of funds.

## **D. SITE VISITS**

The annual site visit is among the most important activities in the Perkins cycle and is scheduled at such time as to maximize the number of issues that can be addressed during the visit. For example, site visits are scheduled during February and March after data reports have been provided and prior to program development for the following year, and in the general time period when final amendments are due and can be discussed. Many of the deadlines found in the Perkins cycle are built around a site visit schedule in February and March.

Site visits are conducted for the purposes of compliance monitoring and technical assistance and State Staff may request to include institutional staff other than the coordinator in the site visit. The Site Visit Checklist can be found in Appendix H.

***Compliance:*** Compliance monitoring will review effective use of administrative funds, quality and progress to date of funded activities, financial management, and data collection quality.

***Technical Assistance:*** The site visit also affords an opportunity for technical assistance. The visits are scheduled so that timing is conducive to reviewing past performance and preparing for next-year program development. It is scheduled so that financial issues can be addressed between the visit and end of year reporting.

Following the site visit, State Staff will provide a written report to the coordinator and the CAO of the institution.

## **E. SITE VISIT PREPARATION**

State Staff will schedule the site visit well in advance in order to give the coordinator sufficient time to prepare. The following activities should be considered when making preparations.

- Have Perkins binder available for review. Binder should include all documents related to the performance of the grant. This includes financial expenditures, personnel activity reports, performance measure information, etc.
- Be familiar with the institution's Local Plan and how current activities support the plan. This includes being familiar with how the institution is meeting its obligation for required use of funds categories.
- Review Annual Plan and be knowledgeable of progress to date of each activity. Assure that staff connected to funded activities will be available to State Staff if needed.
- Be prepared to discuss activities from previous cycle that are to be measured during the current cycle.
- Review Data Charts and Data Summary Reports to be knowledgeable of performance levels and how data is used in program selection process. Be prepared to discuss results from previous year.
- Assure that all financial records are current and available including personnel timesheets.
- Assure that equipment purchases have been properly inventoried and tagged.
- Assure that institutional financial person and institutional data person are available if needed.
- Have list of needs or requests of State Staff available for discussion.

## **F. ANNUAL PLAN RECORDS**

Each coordinator should maintain an organized system of records for each program year containing the following minimum requirements:

- Most current approved Annual Plan
- Accountability data
- Required reports
- Personnel Activity Reports
- Financial records
- Inventory list
- Correspondence and State guidance

## **G. PERFORMANCE IMPROVEMENT PLAN**

### **State Staff Provided Technical Assistance**

Each institution has been assigned to a lead State Staff person as shown on Appendix D. It is hoped that this will improve the quality of assistance provided and improve the efficiency of operations for both State Staff and coordinators, and ultimately improve performance results on core indicator targets.

Technical assistance is provided on an as-need basis and through planned activities such as the fall workshop, spring retreat, new coordinator training, and site visits. The State Staff assigned to your school should be contacted if additional support is needed.

ADHE is required to evaluate the performance of each postsecondary institution in each core indicator area. If the institution is not making substantial progress, State Staff is required to make an assessment of needs, enter into an improvement plan to assist the institution in overcoming deficiencies, and conduct regular evaluations of progress being made.<sup>1</sup>

## Local Improvement Plan

The following guidelines for improvement plans will be used to develop an improvement plan for each indicator with deficient results. In summary,

- IP Year 1: State staff will prescribe uses of funds.
- IP Year 2: State may withhold administrative funds.
- IP Year 3: State staff may recommend that some or all of basic grant funds be redirected to an alternate provider.
- IP Year 4: State will recommend that all basic funds be redirected to an alternate provider or that the institution be released from improvement plan status because targets have been met.

Recommendations for sanctions will be made by state staff to the ADHE associate director for academic affairs who will inform the chief academic officer of the affected institution. Guidelines to determine amounts to be withheld will be determined in consultation with chief academic officers of institutions during the transition year concurrent with negotiation of performance measures for Program Years 1 and 2. Guidelines will provide for the release from an improvement plan at such time as the institution meets performance targets.

### *Program Year 1 (2008-09):*

Institution fails to achieve 90 percent of an indicator and is notified by the state that an improvement plan must be implemented during Program Year 2 (2009-10). This may result in revisions to the annual plan approved for Program Year 2. Because results for Program Year 1 will be known as early as mid-September 2009, sufficient time will be available to fully implement an improvement plan for Program Year 2, the program year immediately following the year for which performance was deficient.

### *Program Year 2/Improvement Plan Year 1 (2009-10):*

State staff will work with local coordinators to have an improvement plan approved for implementation no later than the second semester of Program Year 2. State staff will prescribe uses of basic grant funds as the improvement plan is developed, with special consideration for performance gaps for members of special populations. State staff will monitor progress and provide technical assistance as needed to assure that the improvement plan is fully implemented during Improvement Plan Year 1.

### *Program Year 3/Improvement Plan Year 2 (2010-11):*

State staff will review performance results from Improvement Plan Year 1 to determine level of improvement. If performance has not improved over Program Year 2 results, staff may recommend the withholding of the institution's administrative funds beginning with Program Year 3/Improvement Plan Year 2 until the institution is no longer required to operate under an improvement plan or until sanctions have been removed.

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<sup>1</sup> Perkins IV, Title 1, Part C, Section 123 details Local Improvement Plan requirements

*Program Year 4/Improvement Plan Year 3 (2011-12):*

If results from Program Year 3 show no positive improvement, state staff may recommend that some or all of basic grant funds be redirected to an alternate provider with the capacity and expertise to provide services to the failing institution's CTE students.

*Program Year 5/Improvement Plan Year 4 (2012-13):*

If results from Program Year 4 show insufficient improvement or if the institution has failed to meet 90 percent of the same performance target for three consecutive years, state staff will recommend sanctioning actions to redirect all Perkins funds to an alternate provider.

## 5-Step Improvement Process

OVAE offers a *CTE Self-Assessment Tool*<sup>2</sup> and a *5-Step Improvement Process* model for use at the State level and institutions can modify it for use in developing a local improvement plan. These are offered as samples with the understanding that the institution may develop a program customized for the unique needs of the institution or use instruments from other states/institutions. Additional information can be found at <http://www.edcountability.net/> and in Appendix I.

- Step 1: Document performance results, trending over multiple years.** Where are the gaps? Analyze data and make relevant comparisons. *Understand the Problem Completely Before Seeking Solutions.*
- Step 2: Identify potential direct and indirect causes and prioritize those to address.** *Don't settle for standard thinking; always ask why.*
- Step 3: Review and evaluate potential solutions.** Select best solutions based upon costs, available resources, and stakeholder support. *Get all the facts before too quickly adopting best practices.*
- Step 4: Pilot-test and evaluate solutions.** Determine tools and methods useful for testing and evaluation and how you will decide to move into implementation phase. *Make sure it worked somewhere before applying it everywhere.*
- Step 5: Implement solutions.** Develop a measurement system and allow for mid-course corrections. Determine how findings will be used to rethink root causes and develop other improvement strategies. *The problem is not solved until results improve.*

## H. ACCOUNTABILITY FAQ

**Q: Which students should be included in the accountability system?**

**A:** The performance of all vocational and technical (occupational) students enrolled during the reporting period, and who meet the definition of an occupational student (below), is to be included in the institution's Perkins Data Submission.<sup>3</sup>

**Q: Who should be counted as occupational students?**

**A:** All students who have declared a major in a less-than-baccalaureate occupational degree, certificate, or diploma program that has been approved by either the Arkansas Higher Education Coordinating Board or by the State Board of Workforce Education and Career Opportunities should be considered occupational students, and their performance is to be included in the Perkins Data Submission.

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<sup>2</sup> Available at <http://www.edcountability.net/>

<sup>3</sup> OVAE Program Memorandum dated October 15, 1999.

- Q: What programs are considered occupational in nature?**  
**A:** All programs that prepare students for the workplace should be considered occupation in nature. This includes certificate of proficiency programs, technical certificate programs, AAS and AS. Occupations for which a baccalaureate degree or higher is required is not considered occupational for Perkins purposes.
- Q: What constitutes completed coursework?**  
**A:** All courses for which a student received an official grade (A, B, C, D, F, etc.) should be considered completed coursework and those grades should be calculated into the student's GPA for the reporting period. Courses from which a student officially withdrew, was dropped, or was assigned a grade of incomplete should not be included.
- Q: When should a course for which a student was given a grade of incomplete but was eventually completed be reported?**  
**A:** When a course for which the student was given an incomplete grade is completed, the grade for that course should be calculated into the student's GPA for the reporting period in which the course was completed.
- Q: How should courses that can be considered either occupational or general education be treated?**  
**A:** If a course can be considered occupational in nature, it should be counted as an occupational course, (e.g., if a course could be considered either academic or occupational in nature, for the Perkins submission, the course should be counted as an occupational course).
- Q: What constitutes a reporting period?**  
**A:** The reporting period begins with the start of the second summer term of one year, and ends with the end of the first summer term of the following year (e.g., S2—F—S—S1). Only activity which occurred during the reporting period is to be reported. These dates correlate roughly with the beginning and ending dates of the fiscal year (July 1 - June 30).
- Q: When should grades earned by students in a course that begin late in one reporting period but don't end until early in the next reporting period be reported?**  
**A:** Grades should be calculated into the student's GPA for the reporting period in which the course was completed.
- Q: How should student performance at another institution be reported?**  
**A:** It shouldn't. Only activity which occurred at the reporting institution should be reported.
- Q: Are grades earned in developmental coursework to be included in the academic GPA?**  
**A:** Student performance in developmental coursework is not to be reported anywhere in the Perkins Data Submission.
- Q: How should Technical Institutes report GPA's for academic achievement?**  
**A:** Since academic subject matter is integrated with the occupational programs at technical institutes, the same GPA is entered for both academic and occupational.
- Q: How is placement determined?**  
**A:** ADHE will search databases of Arkansas Department of Workforce Services and ADHE to determine whether completers are employed or are enrolled in postsecondary education.