

Perkins State Plan: Public Comment

Public Hearings

Public comment was open from March 24, 2025, to April 24, 2025. The period remained open for 30 days until April 24, and two public hearings were scheduled, offering in-person and virtual participation options. Both public hearings were held at the Grimes State Office Building, Room B100, 400 East 14th Street, Des Moines. Individuals could attend the public hearings virtually or via a publicly accessible, non-password-protected Zoom room hyperlink.

March 25, 2025 - 1-3 p.m.

Here is a summary of each public comment and the Department's response.

Public Comment: Shared support for Career and Technical Student Organizations (CTSOs) and emphasizes the importance of implementing them, especially in smaller school districts where it can be challenging. Stresses the need to use Perkins funding in Iowa to support leadership development, not just competitions. With some districts cutting funds and students struggling to fundraise, Perkins funds must help both students and educators, particularly in supporting participation at the national level.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Inquired whether the plan for CTSOs in the community college system changes, particularly regarding funding and requirements, and how these changes may affect students' ability to register or not register for CTSO programs.

Department Response: Thank you for your response. Several comments were received during the public comment, especially regarding the secondary and postsecondary SDLPs, CTSO requirements, and the secondary and postsecondary funding split. Several updates were made to the state plan to address some of this feedback, including: 1) Modifications were made to the SDLPs, 2) The requirement for CTSOs was eliminated at the postsecondary level. 3) The secondary and postsecondary funding split was adjusted to reflect higher CTE enrollments in Iowa's high schools.

Public Comment: Appreciated the mention of the CTE Teacher Academy, highlighting relevance to teacher retention efforts. Also emphasized the importance of adopting the Career Clusters Framework to support program alignment and career readiness.

Department Response: Thank you for your response.

Public Comment: Noted ongoing challenges in finding qualified CTE instructors at the community college level. In contrast, K-12 systems appear to have firm plans in place, and a more comprehensive, statewide strategy was suggested to address these staffing issues at the community college level.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: A question was asked about why previous performance targets are not listed (referencing p. 49), and noted that the new four-year targets appear ambitious. Also noted a significant funding disparity, citing approximately \$50 per K-12 student versus \$1,000 per community college student (p. 38). Additionally, 61.91% of national federal funding directed to students is allocated to secondary students, aligning with OCTAE national averages. Emphasized that increased support for secondary students through work-based learning (WBL), industry-recognized credentials (IRCs), and financial aid could strengthen the pipeline to postsecondary CTE participation.

Department Response: The department adjusted the secondary and postsecondary allocation to eligible recipients, split 60% going towards secondary and 40% going towards postsecondary. The rationale for providing 60.00% of Perkins funding to the more than 300 high schools in the state is that it authorizes additional financial support to expand their CTE programs and participation in CTSOs. Many CTE programs, like those in the skilled trades or technology, necessitate specialized equipment and materials that can be expensive to acquire and maintain. Perkins funding can also be used to provide professional development for CTE instructors, ensuring they have the latest skills to effectively teach emerging technologies.

Public Comment: A question raised concerns about the costs associated with dual and concurrent enrollment programs. How is supplemental weighting applied, noting that while community colleges often run the programs, K–12 schools receive the funding? The need to understand the “real cost” of these programs for both K–12 districts and community colleges was emphasized.

Department Response: The department adjusted the secondary and postsecondary allocation to eligible recipients, with the split going 60% towards secondary and 40% towards postsecondary. The rationale for providing 60.00% of Perkins funding to the more than 300 high schools in the state is that it allows them financial support to expand their CTE programs and participation in CTSOs. Many CTE programs, like those in the skilled trades or technology, necessitate specialized equipment and materials that can be expensive to acquire and maintain. Perkins funding can also be used to provide professional development for CTE instructors, ensuring they have the latest skills to effectively teach emerging technologies.

April 1, 2025 - 9-11 a.m.

Here is a summary of each public comment and the Department's response.

Public Comment: Is the October stakeholder meeting available?

Department Response: Yes, documents related to the October Perkins Stakeholder meeting are available upon request.

Public Comment: Expressed concern that the State Determined Performance Level (SDPL) targets are overly aggressive and lack justification, particularly given that performance numbers (p. 49) have remained unchanged and teachers are not being adequately supported to meet the rising expectations. A 1% annual increase in indicators 1–3 without outlined strategies is seen as unrealistic and sets secondary CTE teachers up for failure.

Also questioned the alignment between Iowa's new definitions of work-based learning (WBL) and the increasing performance expectations. Concerns were raised about whether all students should be expected to enter CTE pathways (3S1 – post-program placement), especially since it's the one performance metric currently being missed. Also asked for clarification on the denominator used in metric 5S3—whether it includes only CTE concentrators or all students.

Additionally, the report stressed the need to consider rural school districts, noting that in some areas, there may be only one industry within a 20-mile radius, making it difficult for students to meet WBL or placement-related metrics. Questions were also raised about the graduation rates for non-CTE students and the consequences of failing to meet performance benchmarks.

Department Response: The department went back to the drawing board to reanalyze and forecast different levels of “growth” scenarios for both Secondary and Postsecondary State Determined Performance Level (SDPL) targets; fortunately, by this point in time, Iowa's 2023-2024 Federal Consolidated Annual Report (CAR) was approved, so the 2024 and 2023 2-year average could and were utilized. Most of the SDLP targets were revised downwards significantly, and are still in compliance with the following in Sec. 112 Accountability, “...(ee) when being adjusted pursuant to clause (ii), be higher than the average actual performance of the (2) most recently completed program years, except in the case of unanticipated circumstances that require revisions in accordance with clause... & (bb) require the State to continually make meaningful progress toward improving

the performance of all career and technical education students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48)."

Public Comment: It is not developmentally appropriate for students to have a solid understanding of their postsecondary plans in secondary school.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Noted that statewide oversight of teacher internships has shifted, with STEM now receiving the primary focus. Emphasized that CTE teachers should also be prioritized in these internship opportunities, as they were in the past.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Advocated for increased support in developing new secondary CTE programs. Suggested that the Department of Education provide technical assistance by creating a model program that outlines course progressions aligned with specific CTE standards. This resource would help clarify the appropriate course sequencing and how the career cluster model integrates into program design, ultimately supporting the development of strong and coherent programs of study.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Highlighted that the growth of CTE opportunities has led to rising expenses that are becoming difficult for the district to manage. The introduction of additional unfunded mandates, such as industry-recognized credentials (IRCs), puts further strain on resources. Also noted that Iowa's state CTE funding for secondary schools is relatively low compared to national standards. Proposed establishing a dedicated district fund set aside for supporting IRCs, work-based learning (WBL), and CTSO programs to help address these challenges.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Discussed various pathways to becoming a CTE educator, including the traditional 4-year college route through institutions like ISU and UNI. Historically, Perkins funding supported CTE teacher preparation programs, covering costs related to educator training, student recruitment, retention, and placement. However, this support is no longer in place. Further emphasized that being a CTE educator is itself part of the CTE career cluster. Recommended that the state prioritize traditional 4-year programs, followed by CTE authorizations and endorsements, in this order. Additionally, strongly advocated for creating a state-level CTE teacher educator academy. Affirmed that teaching, whether CTE or non-CTE, is a professional field supported by research and practice, and Iowa's state CTE standards are as rigorous as those for non-CTE fields.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Document edits and feedback include:

Page 9: The second sentence in the paragraph about minimum requirements is unclear, out of place, and needs revision.

Page 12: The section on faculty in CTE education focuses on recruiting more students into educator programs. Ongoing challenges were noted with industrial tech support at UNI, particularly in the first paragraph under Section C.

Page 14: Regarding CTE standards, a question was asked about the plan for aligning with modernized career clusters, especially concerning state content areas, Iowa's program-level CTE standards, and program-level advisory councils.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: On page 22, a concern was raised about the loss of CTE teacher support for internships and externships with business and industry, which were previously available to CTE educators, not just STEM teachers in secondary education. Emphasized that the return on investment (ROI) for professional development and teacher retention was significant and questioned why this support is no longer in place.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Several concerns were raised about the IRC initiative being added as a secondary performance indicator (5S1) and the doubling of state-determined levels of performance (SDLPs) each year. They questioned where the funding will come from—whether from districts, Perkins dollars, or if the state will double its financial support for these initiatives, which include work-based learning (WBL) and Career and Technical Student Organizations (CTSOs), despite limited resources. Sustainability is a major concern, as the current funding structure may not support the growing number of initiatives without additional funding.

Skepticism was expressed about the ambitious performance targets, which they believe are unrealistic and could set districts and community colleges up for failure. They compared the initial targets for Perkins V (2020-2024), which were data-driven and reasonable, to the more recent targets that seem disconnected from realistic expectations.

There were also concerns about parity between secondary and community college expectations, particularly for nontraditional program participation (4S1). Smaller and rural schools face unique challenges in meeting these targets due to limited resources compared to larger schools.

Additionally, ongoing misconceptions were pointed out about nontraditional program participation among various stakeholders, including superintendents, educators, and parents. They also questioned the fidelity of district reporting and whether courses under programs are being manipulated to meet accreditation requirements.

Further, concerns were raised about the lack of state-level advisory council meetings for content areas (e.g., human services/FCS) and the increasing strain on the Department of Education (DE) staff, which has become too lean to support state-level work adequately. They stressed that more staffing and resources are needed to meet the ambitious goals of the Perkins state plan.

Finally, it was recommended to add more context to the state plan regarding the state-approved IRC list, including the process for updating it annually. They also suggested leveraging strong Regional Planning Partnerships (RPPs) to help improve areas like program improvement, data analysis, and WBL. They also mentioned that the local formula distribution split (85% of Perkins funding) needs to be reconsidered, especially given the growing costs associated with WBL, CTSOs, and IRCS for secondary schools.

Department Response: The department went back to the drawing board to reanalyze and forecast different levels of “growth” scenarios for both Secondary and Postsecondary State Determined Performance Level (SDPL) targets; fortuitously, by this point in time, Iowa’s 2023-2024 Federal Consolidated Annual Report (CAR) was approved, so the 2024 and 2023 2-year average could and were utilized. Most of the SDLP targets were revised downwards significantly, and are still in compliance with the following in Sec. 112 Accountability, “...(ee) when being adjusted pursuant to clause (ii), be higher than the average actual performance of the (2) most recently completed program years, except in the case of unanticipated circumstances that require revisions in accordance with clause... & (bb) require the State to continually make meaningful progress toward improving the performance of all career and technical education students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48).”

Written Public Comment

Feedback was also submitted by email to cte@iowa.gov or via U.S. Postal Service to the Iowa Department of Education, Bureau of Career and Technical Education and Postsecondary Readiness, 400 E. 14th Street, Des Moines, IA 50319. There were no Postal Service comments received; only email comments.

Email Comment

Here is a summary or direct quote of each public comment and the Department's response. There were 90 email comments received during the public comment period. If multiple comments are related to the summary or quote, this is indicated.

Public Comment: A common theme was around the following points on the benefits that Community Colleges play (71 related comments):

- Community Colleges are vital in sustaining high-quality career academies that benefit secondary students.
- It is important to maintain the current funding split between secondary and postsecondary.

Department Response: Thank you for your response. Several comments were received during the public comment, especially regarding the secondary and postsecondary SDLPs, CTSO requirements, and the secondary and postsecondary funding split. Several updates were made to the state plan to address some of this feedback, including: 1) Modifications were made to the SDLPs, 2) The requirement for CTSOs was eliminated at the postsecondary level. 3) The secondary and postsecondary funding split was adjusted to reflect higher CTE enrollments in Iowa's high schools.

Public Comment: Another theme was around adjusting the language to change the CTSO requirement to "optional" (12 related comments):

Department Response: Thank you for your response. Several comments were received during the public comment, especially regarding the secondary and postsecondary SDLPs, CTSO requirements, and the secondary and postsecondary funding split. Several updates were made to the state plan to address some of this feedback, including: 1) Modifications were made to the SDLPs 2) The requirement for CTSOs was eliminated at the postsecondary level and 3) The secondary and postsecondary funding split was adjusted to reflect higher CTE enrollments in Iowa's high schools.

Public Comment: Advocating for an increase in the secondary split (3 related comments):

Department Response: Thank you for your response. Several comments were received during the public comment, especially regarding the secondary and postsecondary SDLPs, CTSO requirements, and the secondary and postsecondary funding split. Several updates were made to the state plan to address some of this feedback, including: 1) Modifications were made to the SDLPs, 2) The requirement for CTSOs was eliminated at the postsecondary level. 3) The secondary and postsecondary funding split was adjusted to reflect higher CTE enrollments in Iowa's high schools.

Public Comment: Adjust the language around the qualifications of CTE instructors (3 related comments):

Department Response: Thank you for your comment. The Perkins state plan does include an initiative to create a mentoring program for lateral entry educators.

Public Comment: Reconsider the State Determined Performance Levels (SDPLs) (3 related comments):

Department Response: Thank you for your response. The department went back to the drawing board to reanalyze and forecast different levels of “growth” scenarios for both Secondary and Postsecondary State Determined Performance Level (SDPL) targets; fortuitously, by this point in time, Iowa’s 2023-2024 Federal Consolidated Annual Report (CAR) was approved, so the 2024 and 2023 2-year average could and were utilized. Most of the SDLP targets were revised downwards significantly, and are still in compliance with the following in Sec. 112 Accountability, “...(ee) when being adjusted pursuant to clause (ii), be higher than the average actual performance of the (2) most recently completed program years, except in the case of unanticipated circumstances that require revisions in accordance with clause... & (bb) require the State to continually make meaningful progress toward improving the performance of all career and technical education students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48).”

Public Comment: Provide supplemental funding to support CTSOs further.

Department Response: Thank you for your response. Several comments were received during the public comment, especially regarding the secondary and postsecondary SDLPs, CTSO requirements, and the secondary and postsecondary funding split. Several updates were made to the state plan to address some of this feedback, including: 1) Modifications were made to the SDLPs, 2) The requirement for CTSOs was eliminated at the postsecondary level. 3) The secondary and postsecondary funding split was adjusted to reflect higher CTE enrollments in Iowa’s high schools.

Public Comment: If the state continues to set aside reserve funds for incentive grants supporting credential attainment, I urge that these funds be made equitably available to all eligible secondary Perkins recipients.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: While we support the spirit of accountability and career readiness embedded in the Perkins V plan, we urge caution in any move toward requiring all CTE students to again have an industry-recognized credential (IRC) as a condition of program completion or program quality.

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Is there an opportunity for approved CTSOs receiving affiliation and other membership dues to release an annual report sharing how funds were utilized and how funding supported Iowa’s CTE programs beyond conferences and conventions?

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: Concern about the significant increase in expectations tied to Work-Based Learning (WBL) and Industry Recognized Certifications (IRCs). The most pressing issue lies in the proposed requirement that students complete two Carnegie units of instruction within a single pathway—which, in our district, equates to four courses based in Waukee—for their WBL or IRC experiences to count. This shift raises the threshold for student eligibility. It excludes vital programs like Certified Nursing Assistant (CNA) and Emergency Medical Technician (EMT), which have historically provided strong, industry-aligned outcomes for our students.

Department Response: Thank you for your response. To remain in compliance with the following federal requirements of Perkins V, in Sec. 112 Accountability, “...(ee) when being adjusted pursuant to clause (ii), be higher than the average actual performance of the (2) most recently completed program years, except in the case of unanticipated circumstances that require revisions in accordance with clause... & (bb) require the State to continually make meaningful progress toward improving the performance of all career and technical education students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48)”; the

secondary and postsecondary concentrator definitions must continue as status quo under the state's continuation four-year plan until the next reauthorization of the Carl D. Perkins Act.

Public Comment: "After viewing the state's plan, I have a few thoughts that come to mind. Why do I feel the state wants us to do more with less? In theory, some ideas are ideal. However, if no additional instructors, resources, and/or funding are provided, this plan will crash and burn. It will put even more stress on schools and their CTE instructors. We will not get the SSA we desperately need when they passed at 2%. And the hoops to jump through to get Perkins funding, as well as the more stringent criteria they now require to get funding, are an uphill battle. High school is a time for kids to discover who they are as people and what they may want to do for a career someday. If we require more state-determined performance measures and increases in industry-related certificates, etc., we will overwhelm students, and they will veer away from our course offerings. Students should get to sample various courses vs. feeling pigeonholed into only one area, which could have them missing out on other opportunities. Also, we have a required curriculum we need to teach as a district. How do we get through all the common curriculum AND implement all of these other things? It's TOO much! Teachers will leave. They are already burnt out, which could be another reason to leave the profession. Thank you for your consideration!"

Department Response: Thank you for your response. The department will take these under advisement.

Public Comment: "On Page 8, it should be clarified that the standards for Initial CTE Authorization and Full CTE Authorization apply to K-12, but not to community colleges. I would oppose applying this model to community college CTE instructors."

Department Response: Thank you for your response. The department will take this under advisement.

Public Comment: "Page 34 describes increasing the reserve fund from 3% to 7%. The priorities described on page 34 and the description of uses for the reserve fund on page 36 are more applicable to K-12 education than to community colleges. This indicates a decrease in the amount of the allocation that is available to community colleges. In addition to this, the baseline allocation between postsecondary and secondary institutions (50%-50%) provides less funding for colleges than the allocation put forth in Iowa's previous State Perkins Plan (50.24%-49.76%). Despite this apparent decrease, the allocation is characterized on page 36 as "increased Perkins funding" for community colleges. Community college CTE programs are often expensive. Perkins' support for community colleges must not decrease. Rural community colleges, in particular, struggle to support crucial CTE programs. A significant increase in Perkins funding for community colleges, in light of the increased reserve fund, would dictate something more like a 52%-48% split (if the reserve fun is to be used approximately equally by postsecondary and secondary institutions) or a 55%-45% split if the increased reserve fun will primarily be utilized by K-12 schools. It is important to note that support to community colleges also benefits secondary schools through PACE and concurrent enrollment opportunities."

Department Response: Thank you for your response. The department will take these under advisement.

Public Comment: "While we support the spirit of accountability and career readiness embedded in the Perkins V plan, we urge caution in any move toward requiring all CTE students to attain an industry-recognized credential (IRC) as a condition of program completion or program quality. Requiring universal credential attainment is not always practical or aligned with student or workforce needs. Industry-recognized credentials should be prioritized when they are clearly required for employment, such as a Certified Nurse Assistant (CNA) for entry-level healthcare positions or OSHA 10 for construction and manufacturing careers. However, in many programs, the credential is not a gatekeeper for employment, nor is it always the most relevant or cost-effective measure of student learning."

Department Response: Thank you for your response. The department will take these under advisement.

Public Comment: “I’m on page 29 of our State’s updated Perkins V plan, and I have a question. Assuming the plan is approved as written, will the following require each CTE program to have a concurrent enrollment class as part of their program of study course sequence? Also, will access to an IRC be required per CTE program used to meet offer and teach requirements?”

Department Response: Thank you for your response. The department will consider these comments and questions as the plan becomes operationalized.

Public Comment: “I have serious concerns about equity in funding, the burden placed on rural educators and students, and the sustainability of new expectations for districts like mine.

Rural Funding Inequity

Through the Andrew Perkins Consortium, Bellevue receives approximately \$400 annually, or roughly \$100 per CTE program. In year four, we are allowed a larger purchase by sharing a \$19,268 allocation across four programs, amounting to just \$4,817 per program. In contrast, districts like Davenport receive \$220,000 annually, and Dubuque receives over \$130,000. These urban districts can re-equip two to three full labs per year. It would take over 100 years for Bellevue to match just one year of Dubuque’s equipment upgrades. This is not equitable. Rural Iowans have historically been the backbone of Iowa’s skilled trades and agriculture—yet we are under-resourced, over-extended, and increasingly required to meet the same expectations with a fraction of the support.”

Department Response: Thank you for your response. The department will consider these comments and questions as the plan becomes operationalized.

Public Comment: “The growing emphasis on Industry-Recognized Credentials (IRCs) may unintentionally punish rural districts that lack the facilities, partners, or testing access to offer them. Increasing accountability tied to academic outcomes outside the CTE teacher’s control (such as core subject performance or postsecondary enrollment) adds another layer of stress and inequity for rural educators.

Recommendations

To support equitable and effective implementation of Perkins V, I respectfully request the following:

1. Allow flexibility in CTSO integration, making it optional or supported by additional funding or staffing.
2. Revise funding formulas to better support rural districts, perhaps through a weighted equity model recognizing singleton staffing and multi-prep burdens.
3. Acknowledge the limitations of small districts in meeting certain performance measures and avoid tying funding to outcomes beyond CTE program control.
4. Provide targeted relief or staffing support for curriculum development, credential tracking, and compliance requirements in rural programs.

I want to continue offering meaningful, high-quality career and technical education to my students. But the current direction of the Perkins V plan asks more of rural districts than we can sustainably give—while giving back far less in return.”

Department Response: Thank you for your response. The department will consider these comments and questions as the plan becomes operationalized. Sections 131 & 131 of the Perkins V Act contain the federal distribution of funds provisions that all states must abide by when running the federal formula allocations for secondary and postsecondary grant recipients (district/consortium & community college).

Public Comment: “I would ask the State to examine further the funding mechanisms available to assist districts in connecting students with IRCs and funding mechanisms to support CTE in general. The current approach

advises schools to reallocate funds previously used for maintaining industry-standard machinery, equipment, and teacher training in CTE programs, or rely on local businesses and industries to cover new costs. This approach is similar to what districts were told this past year as Iowa implemented the requirement for schools to embed CTSOs (some of which did not exist for service areas with low enrollment) in service area programming. Districts this year have experienced an increase in ongoing stipends for sponsors, travel costs, state and national dues, etc. As an aside, the cost of providing oversight for and managing registered apprenticeships is a similar unfunded burden on districts. Additionally, we are seeing enrollment declines (partly due to the new ESAs), leading to less per-pupil funding for many districts over time. New, unfunded CTE mandates force schools to shift resources from other areas to meet the above obligations. The suggestion to use Perkins or RPP funding would require schools to hold onto outdated equipment longer, and ultimately have less-trained teachers to deliver instruction. Linn-Mar is fortunate to have access to more Perkins and RPP funding than many other districts. Even so, we also have more teachers needing to maintain training, larger shops, and more metal lathes, wood lathes, drill presses, CNC routers, high-performance computers, welding machines, metal casting equipment, laser cutters, band saws, table saws, joiners, drum sanders, etc. This is not nearly an exhaustive list, and is only for our industrial-tech area. Schools must cover at least four service areas with Perkins and RPP money. At [our school], that means we also provide for FCS, BUS, and AGR. CTE programming is incredibly positive, yet also incredibly expensive to maintain at an industry-standard level. So, [our school], like most schools, will pass on most of the costs associated with obtaining industry-recognized credentials to students. Though doing so will create an equity issue, which we will solve, passing costs on to students will be the best way for us to continue to maintain high-quality, industry-standard shops, labs, and instruction. The bottom line and point I am making is that the State legislature needs to provide additional line-item funding for new CTE mandates. Schools cannot deliver on the new expectations at the level desired by the State with current funding. I completely understand that you have no control over this, but somewhere, someone will need to get more ongoing money for CTE if better outcomes are desired."

Department Response: Thank you for your response. The department will take these under advisement.

Public Comment: "I respectfully request that the Department consider the potential impact of upcoming legislation and funding decisions on Iowa's growing population of homeschooled students, particularly those enrolled under Competent Private Instruction (CPI) via a Home School Assistance Program (HSAP). As a supervising teacher who works closely with homeschool families in Eastern Iowa, I've observed a significant increase in interest from families seeking access to career and technical education (CTE) and dual enrollment opportunities. Many of these students are motivated, capable, and eager to participate in college credit courses and workforce-aligned programming. However, under the current funding structure, school districts often face a deficit when HSAP-enrolled students participate in concurrent enrollment at community colleges. The dual enrollment weighting (.3) does not adequately cover tuition costs, particularly when public funds through HSAPs cannot fully support postsecondary coursework. This financial strain can inadvertently limit access to valuable CTE pathways for homeschoilers, despite their legal eligibility under CPI and participation in district-managed programs. As legislation and funding structures evolve, I hope the Department will consider: The potential for equitable inclusion of CPI-HSAP students in Perkins-funded programming.

Whether modifications to the funding formula or supplemental CTE funding could offset tuition deficits for dual-enrolled homeschoilers. The importance of providing guidance to districts to ensure homeschool students are not unintentionally excluded from CTE opportunities due to budget constraints. I appreciate your continued support of innovative and inclusive career and technical education in Iowa."

Department Response: Thank you for your response. The department will consider these comments and questions as the plan becomes operationalized.