An Equity-Centered,

Comprehensive Local Needs Assessment

Illinois Community College Board





The Office of Community College Research and Leadership (OCCRL) was established in 1989 at the University of Illinois at Urbana-Champaign. Our primary mission is to use research and evaluation methods to improve policies and programs to enhance community college education and transition to college for diverse learners in Illinois and the United States. Projects of this office are supported by the Illinois Community College Board (ICCB), along with other state, federal, and private and not-for-profit organizations. Our publications do not necessarily represent the positions or policies of our sponsors or the University of Illinois. Comments or inquiries about our publications are welcome and should be directed to occrl@illinois.edu. This document can be found on the web at http://occrl.illinois.edu. This publication was prepared pursuant to a grant from the Illinois Community College Board (ICCB Grant Number D60008).

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Overview

The Perkins V comprehensive local-needs assessment (CLNA) moves beyond checklist types of assessment processes and instead aims to facilitate a data-informed, continuous improvement process for community colleges to biannually assess the extent to which their career and technical education (CTE) programs and programs of study are aligned with local workforce and economic needs in six key areas: 1) student performance data; 2) size, scope, and quality as defined by the state plan; 3) labor market alignment, 4) progress towards implementing CTE programs of study; 5) recruitment, retention, and training of faculty and staff; and 6) progress toward improving access and equity ([ACTE, 2019](https://cte.careertech.org/sites/default/files/Local_Tool_Needs_Assessment_FINAL_3.18.2019.pdf)). The CLNA process is meant to be completed alongside a diverse body of external stakeholders (listed in Section 4 of the CLNA). Using an equity lens, the CLNA requires disaggregation of data to highlight, analyze, and work toward closing equity gaps for underserved populations. The CLNA process also crosswalks Perkins V and the Workforce Innovation and Opportunity Act (WIOA) requirements for standards and examination of equity and access for specific student subpopulations (Perkins V). Community colleges are required under Perkins V to engage a diverse body of stakeholders in the CLNA process. Following completion of the CLNA, the summation of findings from the CLNA process are to inform community colleges’ development of their Perkins V local application for funding.

## Adopting an Equity Lens

For community colleges to be successful in serving historically underrepresented and marginalized student populations, they must have intentional longstanding practices and processes based in equity (Boggs & McPhail, 2016). When equity is foundational to a community college’s values, it does the inquiry work necessary to uncover who they are disserving in terms of educational opportunities and then identifying root causes as to why. To achieve equity, a community college must be reflective, introspective, and willing to acknowledge how its norms, structures, and practices may create barriers for historically underrepresented and marginalized student populations. Once problems are identified, community college leaders must take system-oriented action to dismantle these barriers to student access and opportunity while providing varying educational resources and opportunities to rectify any inequities.

Applying an equity lens does not mean treating all students or individuals in CTE programs the same way. Adopting an equity lens means that institutions should reassess and take ownership for how their practices may not be working for certain student subpopulations, and how institutional practices need to change as a result ([CUE, n.d.](https://cue.usc.edu/about/equity/equity-mindedness/)). Thus, achieving equity for students should be the ultimate goal of your CTE program design and implementation. The CLNA process offers you and your stakeholders an opportunity to examine the success of your CTE programs through an equity lens.

##### Uncovering Equity Gaps

You will also use an equity lens in the CLNA process to uncover any equity gaps that exist among various student groups by examining data disaggregated by subpopulations. To understand how to use data to uncover equity gaps, we suggest taking a look at a [brief](https://occrl.illinois.edu/docs/librariesprovider4/ptr/prairie-state-brief.pdf?sfvrsn=bacc8289_2) that highlights one Illinois community college as an exemplar. When disaggregating student data for its dental assistant CTE program, this particular community college realized that graduates of this program were overwhelmingly young White women who were not representative of the district’s predominately African-American and Black demographics ([Gallaway, 2018](https://occrl.illinois.edu/docs/librariesprovider4/ptr/prairie-state-brief.pdf?sfvrsn=bacc8289_2)). The college realized the root of the problem stemmed from inequities that within-district students faced in the application process, thus resulting in more out-of-district students accessing the dental assistant program. To redress this inequity, the college set a goal of redesigning its application and admissions processes to open up access and opportunities to its within-district candidates who are mostly students of color.

The inequity uncovered in the example above shows not just an equity gap, but more specifically, a racial equity gap. All community colleges bear some responsibility for racial inequities and should be accountable to redress them when necessary, as it is an injustice that affects our entire state. For example, Illinois has the highest unemployment rate for Black workers nationwide, and this inequity is largely attributed to other injustices such as inequities in educational access and opportunities, as well as racial discrimination in the workforce ([McKinney, 2018](https://www.nprillinois.org/post/black-unemployment-illinois-tops-other-states); [Reinhold, n.d](http://www.ides.illinois.gov/lmi/Pages/Declining_Unemployment.aspx).). Unfortunately, the list of subpopulations emphasized in Perkins V does not include students from racially minoritized groups. However, given the sociopolitical context and evident racial inequities in education and the workforce that exist in the state of Illinois, race *does* matter, and so the CLNA must emphasize not just equity but also racial equity. Museus, Ledesma, and Parker (2015) define racial equity as a systemic assessment of how racially equitable systems that uplift and increase access and opportunity for historically minoritized people of color are equally ingrained into the academic and social practices, polices, and structures of an institution.

The CLNA Process

The sections below have guiding questions that require the analysis of data, not just the reporting of data. Therefore, it is imperative to have disaggregated institutional data available in order to complete a quality assessment. Links to resources such as data and/or reports that may be helpful are included in each section. In contrast to program review, which focuses on a specific program of study during a five-year period, the CLNA suggests the assessment of overall CTE programs biannually to support the advancement of equitable outcomes that meet the needs of your district. At the conclusion of the CLNA, you will provide a summary that flows directly into your Perkins local application.

## PROGRESS TOWARD EQUITY and ACCESS

This section asks you to critically examine your overall CTE programs with an equity lens to assess whether and how equity is **systemically and systematically embedded** in all aspects of your CTE programs’ structures, resources, materials, curricula, pedagogy, and practices. By assessing your CTE programs through an equity lens, you are considering questions such as who is trying to access our programs but can’t and why? What subpopulations’ ideas and perspectives are being considered and whose are left out in program design and execution? What conditions have we created to ensure there is equitable access and success, and what conditions may be hindering access and success for certain subpopulations? What are students’ experiences in the program, and are certain students experiencing inequitable treatment and access in your programs? How can we eliminate policies, structures, and practices that have a disparate impact on students based on their race/ethnicity, gender, disability, socioeconomic level, and whether they are an English language learner? (see [Stewart, 2018](https://www.tcrecord.org/Content.asp?ContentID=22377)).

|  |
| --- |
| To what extent are your programs representative of your district's demographics and the shifts in diversity of your district (by race, gender, age, socioeconomics, English language learners, or disability)? |
| Please enter text here |
| Which populations are underrepresented in your CTE programs?  |
| Please enter text here |
| What efforts have you made to recruit underrepresented student populations into CTE programs?  |
|  |
| What efforts have you made to help the following students transition into CTE?* + Racially minoritized students
	+ English language learners
	+ Students with disabilities
	+ Adult education
	+ Students who have been placed in development education
	+ Any subpopulations according to Perkins V that are underrepresented
 |
|  |
| To what extent are program materials (curricula, informational materials, and events) representative of your district's demographics and the shifts in diversity of your district such as race/ethnicity, gender, age, socioeconomics, English language learners, or disability?* + Are there certain underrepresented populations that are not represented in your materials based on race and language? Provide some solutions addressing these inequities.
 |
|  |

**Suggested Resources**

[Equity and Career and Technical Education brief](https://occrl.illinois.edu/docs/librariesprovider4/cte/equity-brief.pdf)

[Stewart, (D.L. (2017, March 30). Language of appeasement. Inside Higher Ed.](https://www.insidehighered.com/views/2017/03/30/colleges-need-language-shift-not-one-you-think-essay)

1. **STUDENT PERFORMANCE**

The guiding questions in this section will help you evaluate your students’ performance on federal, state, and local measures and identify any equity gaps based on this data. Please examine both aggregate and disaggregated data for subpopulations defined by both Perkins V and the Workforce Innovation and Opportunity Act (WIOA). The disaggregated data allows you and participating stakeholders to identify gaps among subpopulations. We also included guiding questions that encourage you to dig deeper and uncover any racial equity gaps in the data, as research has shown that racial inequities often get overlooked or unaddressed in continuous improvement processes ([Smith, 2018](https://www.insidehighered.com/news/2018/08/21/states-showing-some-progress-closing-racial-equity-gaps)).

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| --- |
| What equity gaps were identified for students in CTE programs for high-demand sectors? * + More specifically, what racial equity gaps were identified for students in CTE programs for high-demand sectors?
 |
|  |
| What equity gaps were identified for students in CTE programs for high-wage sectors? * + More specifically, what racial equity gaps were identified for students in CTE programs for high-wage sectors?
 |
|  |
| Based on the equity gaps you identified, what CTE programs should you prioritize to develop structures, supports, and practices that improve student performance and outcomes?  |
|  |
| What are some of the root causes for the equity and racial equity gaps you identified in your CTE programs? [Please identify how institutional structures, systems, resources, and practices are the root cause and refrain from focusing on perceived student deficits as the cause.]   |
|  |
| How are your CTE students performing in certain gateway courses to high-wage and high- demand sectors compared to non-CTE students? * + Are there differences in performance in gateway courses based on subpopulations? If so, what are the key differences and what may be the root cause of these differences (curricular content, pedagogical practices, support services, etc.)?
	+ Are there differences in performance in gateway courses based on race and ethnicity? If so, what are the key differences and what may be the root cause of these differences (curricular content, pedagogical practices, support services, etc.)?
 |
|  |
| Overall, are there any Perkins student-performance measures that you are not meeting? Identify key root causes and strategies to improve performance.  |
|  |
| In what ways are you examining student growth and improvement in both learning and performance (Consider formal classroom as well as clinical or practicum settings)?  |
|  |

**Suggested Resources**

[Identify Equity Gaps](https://occrl.illinois.edu/ptr/equity-and-outcomes-assessment/step-3)

[Facing Equity: Understanding P-20 Equity Conscious Leadership for College and Career Pathways](https://occrl.illinois.edu/docs/librariesprovider4/prc/facing-equity.pdf)

[Perkins V at a Glance: Equity Gap Analysis- Local](https://www.napequity.org/nape-content/uploads/NAPE-Perkins-V-Local-Equity-Gap-Analysis-At-A-Glance_v3_10-29-18_ml.pdf)

1. **RECRUITMENT, RETENTION, AND TRAINING OF CTE EDUCATORS**

The questions below should assist you in evaluating current and future recruitment, retention, and professional development needs with both an equity and culturally responsive lens. In terms of equity, consider how you are recruiting faculty members from underrepresented groups and if they are reflective of the diversity of your student population and your regional and local context. You should also assess in this section the extent to which your faculty is prepared to offer curriculum and teach in a way that is culturally responsive by engaging and speaking to the experiences of your diverse student populations ([Owens, 2018](https://occrl.illinois.edu/docs/librariesprovider4/cte/cr-brief.pdf)).

|  |
| --- |
| How has your institution engaged employers in the recruitment of CTE faculty? * + More specifically, what groups are underrepresented among your CTE faculty by race/ethnicity, gender, and disability? How is this underrepresentation of faculty reflective of industry as well?
	+ Among your CTE faculty, how are you increasing representation of underrepresented groups, especially in terms of groups that are underrepresented by race/ethnicity, gender, and disability?
 |
|  |
| In what programs of study do you need to recruit and develop more educators? What are some strategies you have already begun to implement toward this effort?  |
|  |
| What supports do you provide to transition industry professionals to the role of teaching, and understanding student learning and development as well as institutional culture?  |
|  |
| What do educators report as their needs and preferences for professional development and benefits?  |
|  |
| How do you advance culturally responsive teaching in CTE through professional development and any other ongoing, embedded, and systemic supports for educators?  |
|  |
| How do you ensure that your CTE program leadership is culturally responsive (e.g., deans, vice presidents, workforce partners, advisory committees)?  |
|  |
| How are you ensuring your CTE educators are meeting credentialing requirements to teach?  |
|  |

**Suggested Resources**

[Culturally responsiveness in community college CTE programs brief](https://occrl.illinois.edu/docs/librariesprovider4/cte/cr-brief.pdf)

[Culturally sustaining leadership practices podcast](https://directory.libsyn.com/episode/index/id/10446866)

1. **STAKEHOLDER PARTICIPATION AND VOICE**

Please provide a list of stakeholders who participated in the CLNA process, their title, organization, and how they were involved. As a reminder, according to Perkins V, an eligible recipient shall involve a diverse body of stakeholders, including, at a minimum 1) representatives of career and technical education programs in a local educational agency or educational service agency, including teachers, career guidance and academic counselors, principals, and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals; 2) representatives of career and technical education programs at postsecondary educational institutions, including faculty and administrators; 3) representatives of the state board or local workforce development boards and a range of local or regional businesses or industries; 4) parents and students; 5) representatives of special populations; 6) representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at-risk youth (as defined in section 1432 of the Elementary and Secondary Education Act of 1965); 7) representatives of Indian tribes and tribal organizations in the state, where applicable; and 8) any other stakeholders that the eligible agency may require the eligible recipient to consult.

|  |  |  |  |
| --- | --- | --- | --- |
|  | Name | Title/Organization | Role in the CLNA process |
| 1. |  |  |  |
| 2. |  |  |  |
| 3. |  |  |  |
| 4. |  |  |  |
| 5. |  |  |  |
| 6. |  |  |  |
| 7. |  |  |  |
| 8. |  |  |  |
| 9. |  |  |  |
| 10. |  |  |  |

**Suggested Resources**

[Pathways to Results Engagement & Commitment](https://occrl.illinois.edu/ptr/engagement-and-committment)

1. **LABOR MARKET ALIGNMENT**

Use the guiding questions in this section to consider how your programs align with state, regional, and/or local labor-market needs and demands. Consult with stakeholders assisting you with this CLNA for current and projected labor-market needs and trends. Stakeholders from local workforce development boards, chambers of commerce, unions, and any industry associations will be especially important to include in the assessment of how your CTE programs align with the labor market. Also consider any information you have gathered such as surveys or exit interviews from alumni who have helped you understand how you have prepared them for the labor market and how they are faring there. Most of the guiding questions in this section will require you to examine labor-market alignment with an equity lens by considering any inequities certain subpopulations may experience in the labor market, why these inequities may exist, and how you can address them.

|  |
| --- |
| What have been emerging and/or growing occupations in your region? * + From an equity perspective, what special populations are not represented in these emerging and/or growing occupations? What are some of the barriers for the groups you identified?
	+ From an equity perspective, what racial/ethnic groups are not represented in these emerging and/or growing occupations? What are some of the barriers for the groups you identified?
 |
|  |
| Has your region experienced economic shifts that impact industry growth? If so, explain how and what types of partnerships and stakeholder engagement has been developed to address these shifts.  |
|  |
| Has your region experienced population shifts that impact industry growth? If so, explain how and what types of partnerships and stakeholder engagement you are developing to address these shifts.  |
|  |
| Among your CTE graduates, identify subpopulations that are thriving in the labor market. What structures, conditions, and resources are supporting their success?  |
|  |
| Among your CTE graduates, identify subpopulations that are experiencing inequities in the labor market. Explain what inequities in opportunities, institutional structures, and resources may be the root cause. * + Are there any racial inequities in the labor market? Explain what inequities in opportunities, institutional structures, and resources may be the root cause.
 |
|  |
| How are your partnering stakeholders and institutions helping English language learners gain skills for high-demand and high-wage jobs? * + What systems, structures, supports, and resources are needed to prepare for and advance opportunities for this population of students to secure employment in high- demand and high-wage jobs?
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|  |
| What are your partnering stakeholders and institutions doing to help students with disabilities gain skills for high-demand and high-wage jobs? * + What systems, structures, supports, and resources are needed to prepare for and advance opportunities for this population of students to secure employment in high- demand and high-wage jobs?
 |
|  |
| Are there certain racial/ethnic groups that your institution is not equitably preparing for high- demand and high-wage jobs? * + Are there certain racial/ethnic groups that are not being equitably supported in securing employment in high-demand and high-wage jobs?
 |
|  |
| How is labor-market data used to support program improvement? * + In what ways are you using data to help identify inequitable employment outcomes, especially racial inequities?
 |
|  |
| After reviewing your local labor-market data, are you missing any potential CTE programs that may be needed in your area?  |
|  |
| Also, does the local labor market data indicate that any CTE programs are no longer feasible for your area (i.e., oversaturated, loss of industry, etc.)? |
|  |

**Suggested Resources**

[Illinois Department of Employment Security](http://www.ides.illinois.gov/LMI/Pages/default.aspx)

[Illinois Career Pathways & Talent Pipeline Analysis](https://www.illinoisworknet.com/ILDS/PriorityAreas/Pages/CareerPathwayMetrics.aspx)

[Economic Modeling System, Inc (EMSI) Labor Market Analysis](https://www.economicmodeling.com/)

Regional and local workforce boards

Advisory boards

1. **PROGRAM SIZE, SCOPE, AND QUALITY**

While you will refer to the state definitions of size, scope, and quality below, Perkins V requires you to assess whether the number of programs or programs of study and courses you offer meet the needs of your student population. Assessments of size could include examining class size in addition to the availability of program resources such as facilities and equipment. For scope, you can consider whether program curricular offerings are seamlessly aligned with the subsequent level of education. Finally, for quality purposes, you can assess the extent in which your programs give students the knowledge and skills critical to gaining employment and achieving success in their careers. To reiterate, please refer to the state’s definition for size, scope, and quality below.

**SIZE**

Local recipients must implement and offer at least one state-approved CTE program of study in one of the nationally recognized 16 career clusters.

* + All Programs of Study are aligned to state, regional, or local in-demand sectors using labor-market information. Size of programs should be informed by labor-market needs.
	+ Follow local board policies on class sizes.

**SCOPE**

A program of study means a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary levels that

a. incorporates challenging state academic standards

b. addresses both academic and technical knowledge and skills, including employability skills

c. aligns with the needs of industries in the economy of the state, region, tribal community, or localities

d. progresses in specificity

e. contains multiple entry and exit points that incorporate credentialing

f. culminates in the attainment of a recognized postsecondary credential

A program of study provides students with a strong experience in and comprehensive understanding of all aspects of industry. The scope of a program must be specified through curricular development, evaluation, and revision. Program scope must be defined in consultation with all stakeholders including business and industry.

**QUALITY**

Through CTE programs, eligible recipients offer students the opportunity to participate in programs of study that lead to an in-demand occupation that is either a high-skill one or a high-wage one. Eligible recipients are encouraged to offer programming that meets two or three of the aforementioned characteristics of a program of study.

Programs of study:

1. Are informed by external stakeholders that include, but are not limited to, secondary partners, postsecondary partners, business and industry partners, local workforce boards, adult education providers, and community-based organizations through advisory committees. The advisory committees must meet, at a minimum, annually.
2. Provide a non-duplicative, fully articulated sequence of courses from secondary to postsecondary and may include transitions to four-year institutions.
3. Include courses and activities that provide students with a comprehensive understanding of and strong experience in all aspects of industry. This includes work-based learning and career exploration.
4. Include academic and technical instruction that is rigorous, integrated, and aligned with appropriate state and industry standards (e.g., academic standards, accreditation bodies, and professional and licensing standards) to meet the skillsets needed by employers.
5. Are led by qualified instructors and staff who are provided with opportunities for comprehensive professional development (e.g., accrediting standards and ICCB administrative rules).
6. Assist the recipients in meeting local performance indicators.
7. Are continuously evaluated and improved using a continuous program improvement process (e.g., Pathways to Results, Program Review, Comprehensive Needs Assessment, Program Quality Rubric, and other course or program evaluation methods).
8. Are offered in appropriate facilities using current technology and equipment.
9. Includes other entry and exit points to provide access and smooth transitions through programming (e.g., adult learners and veterans).

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| Are program-level outcomes aligned with business and industry recognized credentials and standards? * + Identify any CTE programs that are misaligned with credentials and standards of business and industry.
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|  |
| Does your enrollment size have the capacity to meet the demands of the businesses and industries in your region?  |
|  |
| How well do your program offerings meet the needs of students and the communities you serve? * + How do you then ensure that each program is viable in terms of size, scope, and quality as well as sustainable?
 |
|  |
| Based on your last five years of reviewing different programs of study through the Program Review process, were there any recommendations for changes to the size, scope, or quality of any programs? * + What have you done so far to initiate and implement these changes?
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|  |

**Suggested Resources**

Revisit your college’s Program Review reports

1. **PROGRESS TOWARD IMPLEMENTING PROGRAMS OF STUDY**

The questions below will help you determine whether and how, according to Perkins V, your programs of study at the postsecondary level are a coordinated, non-duplicative sequence of academic and technical content. This portion of the CLNA will require you to do backward and forward mapping of your programs-of-study offerings to determine whether they meet labor-market projections as well as educational and economic needs and priorities of the state and your regional and local contexts. It is also important that secondary, postsecondary, and industry stakeholders in your region work closely together to assess that your programs of study, when implemented, offer structured and cohesive transition points at each subsequent educational level as well as at the transition to employment.

|  |
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| Which programs of study have multiple entry and exit points that lead toward earning a credential?  * + What programs of study are underdeveloped and have possibilities for multiple entry and exit points?
	+ Identify concrete ideas, solutions, and plans for further development.
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|  |
| How fully developed and aligned are your programs of study with secondary, postsecondary, and industry? * + Are there specific programs that are misaligned within secondary, postsecondary, and industry areas, and if so, why?
 |
|  |
| How are you adapting programs of study as they become more professionalized and specialized? * + What additional education and credentialing are you providing to respond to the further professionalization and specialization of the programs of study (i.e., articulation to a bachelor's degree, additional certifications, or additional skill training in specialized areas of industries)?
 |
|  |
| How are you ensuring that you meet each student’s individual academic learning needs and mastery of employability skills and readiness?  |
|  |
| What opportunities exist for secondary students in your programs of study to earn dual credit or enroll concurrently?  |
|  |
| In what ways are you facilitating seamless secondary to postsecondary transitions (i.e., communication, assessments, data sharing, college and career counseling and coaching)?  |
|  |

**Suggested Resources**

[Principles to Guide Career Pathways and Programs of Study Implementation and Improvement](https://occrl.illinois.edu/docs/librariesprovider4/pos/cp-principles-2015.pdf?sfvrsn=727bbd89_8)

[Advance CTE Programs of Study](https://careertech.org/programs-study)

1. **PLAN OF ACTION: PREPARING YOUR LOCAL APPLICATION**

Finally, to be eligible for funding, the information gleaned from the CLNA should inform the preparation of your local application. The following guiding questions should help you develop a summary description of the results from the CLNA. The summary description of the results from the CLNA should be included in your location application for funding. After submitting this application, you will return to the CLNA every six months for the next two years—at which time you will re-engage stakeholders in your next CLNA—to ensure continuous improvement and complete a check-in with ICCB on your progress toward systemic, equity-centered change for your CTE programs. We have also included guiding questions for the progress check-in.

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| Which specific subpopulations are not being served well by your programs? * + What institutional structures and practices are creating barriers for these subpopulations that could be addressed immediately?
	+ Which of the problems identified need a more comprehensive, long-term plan?
	+ What priorities from your CLNA will be reflected in your local application?
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|  |
| What strategies will you use to support educators during the next four years to ensure your programmatic and performance goals can be met? * + Which professional development needs are most pressing?
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**PROGRESS CHECK-IN TOWARD SYSTEMIC, EQUITY-CENTERED CHANGE**

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| 6 months: How have you begun to address the equity challenges you identified in your local application? Have any additional equity problems or challenges arisen since you completed your local application? What stakeholders are you engaging to address these key equity problems? What supports are you seeking out to redress identified inequities and equity gaps? Please provide examples.  |
|  |
| Year 1: What has been your progress in addressing the equity problems you identified in your local application? What is hindering the systemic, equity-centered change process? Are there any challenges to redressing the equity gaps and why? At this point, what stakeholders are still engaged in the process?  |
|  |
| 1.5 years: What has been your progress in addressing the equity problems you identified in your local application? What is hindering the systemic, equity-centered change process? Are there any challenges to redressing the equity gaps and why? At this point, what stakeholders are still engaged in the process? What are you already foreseeing as new or ongoing equity gaps or challenges that would need to be addressed in your next local application?  |
|  |

**Suggested Resources**

[Maximizing Perkins V’s Comprehensive Local Needs Assessment and Local Application to Drive CTE Program Quality and Equity](https://cte.careertech.org/sites/default/files/Local_Tool_Needs_Assessment_FINAL_3.18.2019.pdf)

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