Career and Technical Education Districts

48-Month Followup of Report 20-209

The November 2020 Career and Technical Education Districts (CTEDs) special study found that CTEDs and CTED member districts spent $67 million in fiscal year 2019 on career and technical education (CTE) programs designed to prepare students for jobs in high-demand technical fields but did not have accurate and complete data to show whether they were effective in doing so. We made **8** recommendations to the CTEDs, member districts, and the Arizona Department of Education (ADE) and **2** recommendations to the Legislature.

CTEDs', member districts', and ADE's statuses in implementing 8 recommendations

Implementation status	Number of recommendations
✅ Implemented	1 recommendation
☑ Partially implemented	3 recommendations
⧗ Not yet applicable	1 recommendation
❌ **Not implemented**	**3 recommendations**

Legislature's status in implementing 2 recommendations

Implementation status	Number of recommendations
❌ **Not implemented**	**2 recommendations**

Unless otherwise directed by the Joint Legislative Audit Committee (JLAC), this report concludes our follow-up work on efforts to implement the recommendations from the November 2020 report.

Arizona Auditor General
Career and Technical Education Districts | February 2025 | 48-Month Followup of Report 20-209, November 2020

1

Recommendations

Finding 1: CTEDs and member districts spent $67 million in fiscal year 2019 on programs designed to prepare students for jobs in high-demand technical fields but do not have accurate data to show whether they are effective in doing so

1. The Legislature should consider:

   a. Revising A.R.S. §15-393.01 to clarify that ADE should include CTED member districts in the annual achievement profiles and publish data that is disaggregated, when appropriate, by CTE program and district.

   ▶ Status: **Not implemented.**

   The Legislature has not revised A.R.S. §15-393.01 to clarify that ADE should include member districts in the CTED annual achievement profiles or that ADE should publish disaggregated data, when appropriate, by CTE program and district. However, ADE included member district data in the fiscal year 2023 and 2024 CTED achievement profiles. Regardless, absent revisions to A.R.S. §15-393.01 to specify that member districts should be included in the CTED annual achievement profiles, ADE is not required to include this information.

   Related to ADE publishing disaggregated data, ADE published data disaggregated by central campus performance metric outcomes and joint central and satellite campus performance metric outcomes. ADE did not publish data disaggregated by satellite member district or by CTE program for graduation rate, technical skills assessment results, and postgraduation placement rates. Regardless, absent revisions to A.R.S. §15-393.01 to specify that performance metrics should be disaggregated by satellite and central programs in the CTED annual achievement profiles, ADE is not required to include this information.

   b. Revising A.R.S. §15-393.01 to include industry certifications students earned as a performance indicator in CTEDs' and CTED member districts' annual achievement profiles.

   ▶ Status: **Not implemented.**

   The Legislature has not revised A.R.S. §15-393.01 to add industry certifications students earned as a performance indicator in the CTED annual achievement profiles. ADE did not include industry certifications students earned in the fiscal year 2024 achievement profiles presented on ADE's Arizona School Report Card website. However, ADE included data on the number of student certifications attempted and earned by CTE program in fiscal year 2024 on ADE's CTE data and accountability achievement website. Regardless, absent revisions to A.R.S. §15-393.01 to specify that industry certifications students earned should be included as a performance indicator in the CTED annual achievement profiles, ADE is not required to include this information.

Arizona Auditor General
Career and Technical Education Districts | February 2025 | 48-Month Followup of Report 20-209, November 2020

2

2. To ensure accurate, complete, and comparable data is available to assess CTE program effectiveness, CTEDs, CTED member districts, and ADE should:

a. Fully implement the Auditor General's 2017 audit recommendation by continuing to work together to develop and implement ways to consistently collect data for all students participating in CTE programs, including industry certification data, and use this data to help evaluate the effectiveness of their CTE programs in preparing students for jobs related to their CTE program.

▶ Status: **Not implemented.**

As reported in the previous 24-month followup, ADE has worked with CTEDs and member districts to ensure uniform data reporting by offering trainings for all CTEDs. ADE has also provided written guidance to all CTEDs and member districts on how to collect and report data accurately and completely for some outcome data (see explanation for recommendation 2b). However, CTEDs and member districts have not fully implemented consistent CTE outcome data collection, validation, and evaluation procedures including for job placement and industry certifications. Since our previous 24-month follow-up report in May 2023, we have issued 6 follow-up reports of CTED performance audits we conducted with similar recommendations related to CTE program outcome data collection and evaluation.[1] In each of these reviews, we identified that none of the CTEDs we followed up with had fully implemented our recommendations related to consistent outcome data collection or using the outcome data to evaluate CTE program effectiveness. Specifically, although some of the CTEDs we followed up with had implemented training or data collection protocols in efforts to collect consistent data, none had fully implemented these efforts. Additionally, although CTEDs and member districts may have collected some data related to student certifications earned and post-graduation jobs obtained, they continued to lack procedures for validating the data to ensure it was complete and accurate. Further, although some districts had plans to use or had begun using data to evaluate program effectiveness, absent a consistent process to collect and validate outcome data to ensure its accuracy, these analyses will likely be inaccurate and/or incomplete.

Similarly, since our previous follow-up report in May 2023, we issued performance audit reports of 3 additional CTEDs that we have not yet issued follow-up reports for as of January 2025. In all 3 audits, we found the CTEDs lacked complete and reliable key outcome data, which prevented them from demonstrating that their programs effectively prepared students for high-need occupations.[2]

b. Ensure districts are consistent in how they collect CTE program data by developing guidance that addresses what population of students will be tracked and reported on, the time period districts will collect data, verification procedures districts should

---

[1] See Auditor General reports: Initial followup of report 24-201 *Northeast Arizona Technological Institute of Vocational Education*, Initial followup of report 23-207 *Cobre Valley Institute of Technology*, Initial followup of report 23-204 *Northern Arizona Vocational Institute of Technology*, Initial followup of report 23-202 *Coconino Association for Vocations, Industry and Technology*, 18-month followup of report 22-201 *Western Arizona Vocational Education District*, and 24-month followup of report 21-205 *Gila Institute for Technology*.

[2] See Auditor General reports: 24-208 *Mountain Institute Career and Technical Education District*, 24-204 *East Valley Institute of Technology—Report 1 of 2*, and 24-203 *Cochise Technology District*.

Arizona Auditor General
Career and Technical Education Districts | February 2025 | 48-Month Followup of Report 20-209, November 2020

3

perform, supporting documentation districts should maintain, and any other clarification districts need.

▶ Status: **Partially implemented at 48 months.**

As previously reported, ADE has continued to offer trainings for all CTEDs and member districts to help ensure districts collect and report program data consistently. For example, ADE provides CTEDs and member districts written guidance that specifies the population of students and time periods for collecting and reporting enrollment, postgraduation placement, and industry certification data. Additionally, ADE provides written guidance for collecting, reporting, and verifying postgraduation placement data and tools districts can use such as a standardized placement survey and templates for digital surveys. Further, ADE developed an enrollment-discrepancy-reporting tool to ensure both CTEDs and member districts report consistent enrollment information.

However, although ADE officials indicated that CTEDs and member districts should collect and maintain supporting documentation related to industry certifications earned by students, ADE has not developed similar guidance or tools for collecting and verifying industry certification data. ADE officials reported that ADE was developing a method to collect and validate industry credentials earned for all CTEDs and member districts but, as of October 2024, determined it did not have adequate staff necessary to complete this verification. Instead, as discussed in recommendation 3d, ADE plans to provide districts with public-facing credential verification resources to self-validate this information.

3. ADE should:

a. Implement the requirement in A.R.S. §15-393.01 to include each CTED in its annual achievement profiles and letter grade classification system.

▶ Status: **Partially implemented at 48 months.**

As we reported in our previous 24-month followup, A.R.S. §15-393.01 was revised during the 2021 regular legislative session to exclude CTEDs from being assigned a letter grade based on ADE's letter grade classification system, but the remaining requirements for the CTED annual achievement profile were left unchanged. Further, as discussed in recommendations 1a and 1b, despite not being required to do so, ADE has added performance indicators it publishes annually related to CTE achievement metrics and outcomes, including partially disaggregated data beginning in fiscal year 2023. ADE published fiscal year 2024 CTED achievement profiles to ADE's Arizona School Report Cards website that included all 4 statutorily required performance metrics—graduation rate, completion rate for each CTE program, technical skills assessment results, and postgraduation placement rates.

During our previous 24-month followup, ADE reported that it planned to develop a review process to ensure data reported to it by CTEDs and member districts matched the underlying source data and all data was uploaded and included appropriately. However, our review of fiscal year 2024 CTED annual achievement profiles, source data, and ADE CTE accountability data found that the achievement

Arizona Auditor General
Career and Technical Education Districts | February 2025 | 48-Month Followup of Report 20-209, November 2020

4

profiles continued to not include data for all CTED programs as required, and some data was inaccurately reported. Specifically, we identified various programs that were excluded from their respective district's achievement profiles but included in ADE CTE accountability data, such as Network Security, Marketing, and Emergency Medical Services programs. Additionally, 1 district's central and satellite program completion data for all programs was misreported in a separate district's profile.

b. Ensure its reporting processes allow all CTEDs and CTED member districts to report performance data, such as student job placement and industry certification data, for all their CTE students to ADE in a manner that identifies whether the student completed the program at a CTED central or CTED member district satellite campus.

▶   Status: **Implemented at 48 months.**

We reviewed the most recently available enrollment, industry certification, and postgraduation placement data reported to ADE by CTEDs and member districts as of March 2024. Our review found that the data included information for public, charter, private, and home school CTE students and denoted whether the student attended classes at a CTED central or satellite campus. Although ADE has updated its reporting processes to account for all CTE students and whether they complete CTE programs at central or satellite campuses, as discussed in recommendations 2a and 2b, ADE should continue to work with CTEDs and member districts to develop and implement ways to consistently collect and validate outcome data to ensure data reported to ADE is complete and accurate.

c. Implement data-sharing agreements with the Department of Economic Security (DES) and other State agencies, as needed, to obtain CTE students' postgraduation employment and wage information.

▶   Status: **Not implemented.**

As we reported in the previous 24-month followup, ADE reported that it planned to partner with the Office of Economic Opportunity (OEO) to obtain postgraduation employment and wage information through OEO's Integrated Data System. During this followup, ADE officials reported they no longer plan to partner with OEO to obtain CTE students' postgraduation employment and wage information because they would not have access to disaggregated data necessary to evaluate individual student placements. As a result, in October 2024, ADE officials reported they were working to develop an agreement with the Arizona Department of Economic Security (DES) to determine students' postgraduation employment status. Although ADE indicated it anticipated using DES data to validate employment data for fiscal year 2025 graduates, ADE and DES have not formalized a data-sharing agreement that would allow it to do so. ADE reported that DES requires student Social Security numbers to match employment data with specific individuals, and ADE does not collect Social Security numbers from students. Therefore, ADE reported it is investigating alternative solutions to obtain DES data.

As reported in our initial audit report, although school districts do not generally collect Social Security numbers for their students, other states have partnered with state agencies to facilitate data matching to labor data. For example, New Jersey's

Arizona Auditor General
Career and Technical Education Districts | February 2025 | 48-Month Followup of Report 20-209, November 2020

5

Department of Education partnered with the state's Motor Vehicle Commission (similar to the Arizona Department of Transportation's Motor Vehicle Division) to match student names and birthdates to motor vehicle records to obtain a Social Security number. The Social Security number is then used to match CTE program completers to unemployment insurance records, and such a solution may be possible in Arizona.

d. Implement data-sharing agreements with industry certification providers, as needed, to obtain CTE students' certification testing results and attainment data directly from providers.

▶ Status: **Not implemented.**

As we reported in our previous 24-month followup, ADE reported that it has not implemented any data-sharing agreements because certification providers have been unresponsive or unwilling to share certification data with ADE. Further, in our previous followup, ADE officials reported pursuing an alternative solution in which CTE students would sign a release form allowing for the release of certification results from third-party certification providers to students' home districts. However, ADE officials indicated they have not pursued this alternative solution since our previous followup, and there are no current plans to move forward with implementation. Instead, ADE reported it is compiling a list of public-facing credential verification resources, which it plans to provide to districts as a tool to self-validate industry-certifications-earned data when reporting to ADE. ADE officials indicated they are still in the process of developing this resource but anticipate providing it to districts in fiscal year 2025.

e. Partner with the National Student Clearinghouse (NSC), as needed, to obtain CTE students' postgraduation, postsecondary enrollment and outcome data from a single credible source.

▶ Status: **Partially implemented at 48 months.**

As we reported in our previous 24-month followup, ADE established a partnership with NSC to obtain CTE students' postgraduation, postsecondary enrollment data. However, ADE officials stated that ADE does not receive this data until after the due date for CTEDs and member districts to report postgraduation placement data to ADE. As a result, rather than using NSC data as a single credible source for postgraduation, postsecondary enrollment data, ADE officials stated they used NSC data to verify the accuracy of postgraduation, postsecondary enrollment data reported by CTEDs and member districts in fiscal years 2021 and 2022. When comparing fiscal year 2022 NSC data to the data reported by 14 CTEDs and 104 member districts, ADE determined that there was a significant difference between the data reported to ADE by CTEDs and/or member districts and NSC data for 42 districts, or approximately 36 percent of districts.

ADE officials further reported that because the NSC data is not available in time to be used as a source of CTE students' postgraduation, postsecondary enrollment and outcome data, they are pursuing an agreement with the Arizona State System for Information on Student Transfer (ASSIST). ADE officials reported that ASSIST

Arizona Auditor General
Career and Technical Education Districts | February 2025 | 48-Month Followup of Report 20-209, November 2020

6

data can be used to verify postgraduation, postsecondary placement for students attending Arizona's universities and community colleges and that the data could be provided to CTEDs and member districts.

f. Ensure its data-sharing agreements allow it to share CTE students' data with their CTED or member district and work with CTEDs and member districts to supplement any missing information.

▶ Status: **Not yet applicable.**

As previously discussed, ADE is pursuing data-sharing agreements related to postgraduation employment and wage data and postsecondary enrollment data for CTE students, but it has not formalized or entered into any data-sharing agreements as of October 2024. Additionally, as discussed in recommendation 3d, ADE has not implemented data-sharing agreements with industry certification providers to obtain CTE students' certification testing results and attainment data directly from providers and instead is pursuing alternative solutions for districts to self-validate certification results using public-facing credential verification resources.

Arizona Auditor General
Career and Technical Education Districts | February 2025 | 48-Month Followup of Report 20-209, November 2020

7