



# AUDITOR GENERAL'S COMMENTS ON DISTRICT RESPONSE

We appreciate the District's response, including its agreement to implement either all the recommendations or a modification of them. However, the District has included certain inaccurate or misleading statements in its response that necessitate the following comments and clarifications.

1. The District asserts on page 1 of its response that the Auditor General's Office recommends a set of criteria that "creates more burden on not only WAVE but our member districts by adding additional data reporting requirements not supported by statute or federal guidelines and without specific evidence that this effort would result in a better product."

We disagree with the District's characterization of our recommendations as creating "more burden" and not being supported by State law or federal guidelines.

First, although the District's CTE programs are ADE-approved programs, the District must still determine the jobs—the principal employment—that its concentrators obtained. Otherwise, it cannot know whether its concentrators filled high-need vocational or industry needs, as required by State law. Additionally, although the District may be using assessments, such as ADE-approved technical skills assessments, to evaluate its students' career readiness, State law still requires CTE programs to fill high-need vocational or industry needs, and the District should be able demonstrate the extent to which its concentrators do so. Additionally, in fiscal year 2022, the Arizona Department of Education (ADE) began requiring districts that receive federal Perkins Grant monies, which includes all WAVE's member districts, to report the job descriptions of their concentrators after graduation. Therefore, our recommendation to WAVE to collect the job descriptions—data necessary to know whether its concentrators fill high-need occupations—is supported by both State law and ADE's requirement, which is based on federal grant reporting requirements.

Second, the District knowing whether its concentrators earned industry certifications or licenses in high-need occupations related to its CTE programs is necessary because State law requires that CTE programs lead to certification or licensure, if available. Although WAVE collected information on industry certifications earned by its students in fiscal year 2018, it did not analyze the percentage of its concentrators who earned industry certifications in high-need occupations related to their CTE programs to assess program performance. Providing a CTE program that leads to certification or licensure, if available, is a key statutory requirement. Evaluating this measure and using that information to make necessary changes to programs to ensure their effectiveness would help the District better meet this statutory requirement. Additionally, in fiscal year 2020, ADE began requiring districts that receive federal Perkins Grant monies to report their number of concentrators who earned industry certifications. Districts receiving federal Perkins Grant monies were already required to and have been reporting their number of concentrators to ADE. Therefore, the District already collects the data to calculate, document, and analyze the percentage of its concentrators who earned industry certifications in high-need occupations related to their CTE programs. With this data, it can assess program performance in leading to certification and licensure, which is supported by State law and ADE's requirement.

2. The District makes the following statements in its response to Finding 2 (see District's response, page 3):  
"The report states that WAVE 'did not analyze jobs students obtained and industry certifications they earned.' WAVE reviews the ADE CTE performance measures collected by each program on a yearly basis."

The ADE CTE performance measures that the District stated it reviews on a yearly basis did not include

key performance measures for jobs students obtained in high-need occupations. As discussed in Finding 1 (see page 4), the District did not collect data on specific jobs obtained by its students after graduation to assess program effectiveness in preparing students for high-need occupations. Instead, the District's member districts collected data on former students' employers but generally did not obtain the titles of the jobs those former students held. Therefore, the District did not analyze jobs students obtained in high-need occupations.

"Regarding the statement that we did not analyze industry certifications, WAVE has included our industry certification performance in our Classroom Site Fund plan each year starting in 2017-2018 with percentage passing goals. Along with this, the certification data has been tracked each year for other measures."

As discussed in Finding 1 (see page 4), the District did not calculate, document, and analyze the percentage of its concentrators who earned industry certifications in high-need occupations related to their CTE programs. Additionally, in fiscal year 2018, ADE CTE performance measures did not include industry certification performance measures. In fiscal year 2020, the ADE CTE performance measures began including a performance measure of the percentage of CTE concentrators who earned an industry certification out of those who attempted to earn one. Although the District reported this performance measure to ADE CTE beginning in fiscal year 2020, that performance measure is not the one we identify in the audit report as a key outcome. The key outcome data pertaining to industry certifications is the percentage of CTE concentrators who earned an industry certification in a high-need occupation out of all CTE concentrators, not just those who "attempted" to earn a certification. This is a meaningful difference because the number of concentrators who attempted to earn a certification is only a subset of all concentrators, and that subset includes fewer students than the total number of concentrators. In fact, in fiscal year 2020, the number of the District's reported concentrators who attempted a certification was about 24 percent of all its concentrators.

Further, the District refers to its 2017-2018 (fiscal year 2018) Classroom Site Fund (CSF) plan, which included the percentage of its concentrators who took a certification exam and passed. As indicated already, this performance measure is not the one we identify in the audit report as a key outcome. The key outcome data pertaining to industry certifications we discuss in our report is the percentage of CTE concentrators who earned an industry certification in a high-need occupation out of all CTE concentrators, not just those who "attempted" to earn a certification.