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Equity at the Center: How Federal Policymakers Can Support Diverse Student Populations in CTE Pathways Through High-Quality Data

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Introduction

In the mid-19th century, railways in the United States consisted of dozens of small local networks with limited range. As the industry grew, private operators began to work together to standardize mechanisms, maximize profits, and minimize costs.¹ Not until Congress passed the Pacific Railway Act in 1862 did a national effort begin to link all the disjointed pieces into one truly transcontinental railroad. Eventually, four of the five transcontinental railroads built used funding from federal land grants.²

After their completion, these coast-to-coast connections decreased the time and cost of shipping and travel, increased trade between states, and spurred additional routes.³ A similar unification of the country's current Career and Technical Education (CTE) pathways into a cohesive federal system has the potential to standardize goals and metrics, maximize employment, and minimize inequities for learners and workers who all too often get stranded and left behind.

CTE pathways have no shortage of operators. They include the U.S. Department of Labor and U.S. Department of Education, and their state counterparts, kindergarten-to-12th grade (K-12) schools and school systems, colleges and other postsecondary providers, employers, intermediaries, and associations. This wide network of actors facilitates courses and programs that provide the skills and knowledge required for specific jobs or fields of work. High-quality education and career pathways can help learners transition into high-demand, higher-wage careers.⁴ Unfortunately, just as the early railways profited from the exploitation and exclusion of Asian, Black, and Native Americans, current CTE pathways uphold the historic practice of tracking today's students of color into programs that lead to low-wage positions in the U.S. labor market.⁵

High-quality data can be the connective tracks that chart the path to a cohesive federal system of CTE pathways. Data on CTE pathways should be accurate, complete, comprehensive, disaggregated, and timely. Quality data allow stakeholders to understand which programs are equitably serving, supporting, and retaining students, and which programs need improvement. Data can help decision-makers understand and assess program quality, success, and outcomes for different learner populations.

Truly high-quality data would finally help stakeholders identify communities of color who are currently lost or inaccessible, such as Afro Latinos, Southeast Asian Americans, and immigrant students, including undocumented students and newcomer students who have recently arrived in the United States.⁶ The collection of data on CTE pathways should focus on program-level outcomes to facilitate the identification of learner populations in need of additional supports and interventions. Quality data allow stakeholders to understand which programs are equitably serving, supporting, and retaining students, and which programs need improvement.

These data can help decision-makers understand and assess program quality, success, and outcomes for different learner populations. Truly high-quality data would finally help stakeholders identify learners in communities of color, such as Afro Latinos, Southeast Asian Americans, and undocumented and newcomer immigrants, who are currently invisible in data.

The Current State of CTE Pathways’ Data Policies and Programs

Federal policy plays an important role in providing coherence across CTE pathways’ data systems and driving the data requirements for learners and providers. When federal guidance is ambiguous, pathway providers may collect a myriad of different or disjointed data on learners and may not be able to tie this information to learner outcomes. Various entities and agencies collect data on CTE pathways, and each entity has its own reporting systems making data harder to streamline and tie to individual student outcomes.

It can be difficult, for example, to collect accurate and complete data on the types of programs students experience because programs are coded differently. Federal policymakers can incentivize the collection and reporting of clear, consistent learner demographic data and their outcomes by clearly communicating across education and workforce agencies.

Current CTE pathways’ data systems face several challenges that hinder their effectiveness for students, educators, policymakers, and employers. Addressing these challenges requires concerted efforts from the federal government to improve data governance, enhance data infrastructure and interoperability, invest in data-quality assurances, and foster data-driven decision-making across education and workforce systems. Additionally, stakeholders need to collaborate to develop common data standards, streamline data collection and reporting processes, and improve collaboration and cohesiveness among stakeholders.

1 The collection of student data is disjointed.

CTE pathways' data often exist in fragmented systems of providers ranging from K-12 educational institutions, community colleges, technical schools, CTE programs, and workforce agencies. Without intentional coordination — alongside an entity that oversees this coordination — providers will likely continue to develop data systems independent from each other. This fragmentation makes it difficult to comprehensively streamline and analyze data.⁷

2 The data is siloed across federal and state agencies.

Beyond the provider level, many CTE pathways' data systems operate in silos and lack interoperability with other educational and workforce data systems, including those of state and federal agencies. For example, K-12 education data systems at the state and federal levels are housed in their respective state education agencies and at the U.S. Department of Education. They rarely interact with data systems that are housed at the U.S. Department of Labor. As a result, it is challenging to integrate CTE pathways' data with broader education and labor market information to provide insights on progress and outcomes for youth in these pathways.

3 The data-collection system lacks system-wide standards and accuracy.

CTE pathways lack standardized data definitions, formats, and reporting requirements. Inconsistency complicates data sharing, comparison, and analysis. Additionally, data-quality issues, such as incomplete, outdated, or inaccurate information, undermine the reliability of these data for decision-making and evaluation.⁸ Poor data quality can limit decision-making to non-consequential levels and/or lead to misinterpretation and misalignment of resources.

4 The data does not include information on potentially underserved ethnic subpopulations.

Inadequately disaggregated student-level data is an equity concern. Existing data systems do not comprehensively capture student-level information for the diversity of today's students, including demographic characteristics by detailed race and ethnicity groups, participation in CTE and work-based learning experiences, and attainment of industry-recognized credentials. When data systems fail to provide information on how ethnic subgroups are served by CTE pathways, policymakers who rely on existing data systems to make decisions perpetuate inequities in access and outcomes.



Spotlight on Underserved Ethnic Populations

Current CTE pathways' data systems do not reflect populations at the intersection of race and ethnicity, including Afro Latino, Southeast Asian American, and immigrant students such as newcomer students, undocumented students, and English Learners (EL). Current subpopulation requirements do not go far enough in highlighting the disparities within large racial umbrellas and across newcomers and ELs.

In turn, inequities for smaller subgroups are hiding in plain sight, with subgroups experiencing disproportionate rates of poverty and instability without the requisite resources to address their educational and economic outcomes. Policymakers must investigate and address these inequities by requesting more granular data collection.

While there are other subpopulations and ethnic groups who are important for federal policymakers to uplift in CTE pathways, **this report focuses on a few examples of overlooked groups who our respective organizations center in our work.** Federal policymakers should engage with diverse stakeholders and community members to uncover opportunities to provide transparency and elevate more underrepresented and underserved communities in CTE pathways.

Afro Latino

According to the UCLA Latino Politics and Policy Institute, “the term Afro-Latinx refers to people of visible or self-proclaimed African descent from Latin America and the Caribbean, whether they currently live in the Caribbean, the Americas, or elsewhere.”⁹ The community is made up of “individuals who identify as of Hispanic or Latino ethnicity and also identify as racially Black in any combination, either Black alone or Black and one or more additional races.”¹⁰ Data on this population can be hard to track for a few reasons:

- **Conflating race and ethnicity:** Because this population is both an ethnic and a racial identity, the data on their demographics and outcomes as learners can vary from one dataset to another. Pew Research Center, for example, estimates that roughly 6 million U.S. adults identify as Afro Latino, with a margin of error of plus or minus 600,000 people.¹¹ However, in the 2020 U.S. Census, only 1.2 million people identified as Black Hispanic alone and 2.6 million identified as Black Hispanic alone or in combination.¹² The new Office of Management and Budget (OMB) Statistical Policy Directive 15 (SPD 15), that was released in March 2024, now requires federal agencies to collect detailed disaggregated racial and ethnic data as the default.¹³ However, the new OMB standard now also asks, “What is your race and/or ethnicity?” This question thereby collapses Latino/Hispanic ethnic identity into an ethno-racial category instead of both an ethnic and a racial identity. Some criticize this as OMB equating “Hispanic/Latino” as a category akin to “Black,” and discouraging multiple box-checking.¹⁴
- **Culturally responsive data collection:** Data collections methods can have an impact on response rates and results. Pew Research Center, for example, notes that though most of its surveys conducted online yielded similar results, its 2014 survey of Hispanic adults was conducted by phone and found a much higher percentage of Latinos who self-identified as Afro Latino.¹⁵
- **Nationality and subgroups:** Pew Research Center also posited that the differing responses in the 2014 results could be due to changes in question wording across surveys. The 2014 phone survey asked Latino adults if they considered themselves to be Afro Latino and expounded by listing different Afro Latino subgroups such as Afro-Caribbean and Afro-Peruvian.¹⁶ The U.S. Census Bureau often uses the terms Afro Latino and Garifuna in tandem, but that has changed over the years. Notably, “in the 2000 and 2010 censuses, Garifuna was classified and tabulated as part of an aggregate “Other Central American” group in the ethnicity question. As these terms were listed as detailed Hispanic origin groups in the 2020 census code list, official counts in the Detailed Demographic and Housing Characteristics File-A of the Afro Latino and Garifuna responses were tabulated from the ethnicity question.”¹⁷

Southeast Asian American

The Southeast Asia Resource Action Center defines Southeast Asian American (SEAA) not only as a geographic identity, but also as a political identity that comes from the shared experiences of people who came to the United States as refugees from Cambodia, Laos, and Vietnam. SEAs now number over 3 million, the vast majority of whom are refugees, the children of refugees, and their family members. Today, Southeast Asian Americans include:

- Persons from Cambodia, including Cham, Khmer, and Khmer Loeu;
- Persons from Laos, including Hmong, Khmu, Lahu, Lao, Iu Mien, Phu Tai, Tai Dam, Tai Deng, and Tai Lue; and
- Persons from Viet Nam, including Cham, Hmong, Khmer Kampuchea Krom, Lahu, Iu Mien, Montagnards, Phu Tai, Tai Dam, Tai Deng, Tai Lue, and Vietnamese.



While Asian Americans as a whole are considered high achieving with economic prosperity, nearly 60 percent of Hmong Americans are low income, and more than one of every four live in poverty. All SEAA ethnic groups have lower per capita incomes than the U.S. average and also struggle with housing stability.¹⁸

They have unique historical migration patterns, resettlement experiences, and socio-economic challenges that may not be adequately captured or understood within traditional data collection frameworks. The K-12, CTE, and workforce data systems may leave out SEAs due to several reasons, among them:

- **Lack of granularity:** K-12, CTE, and workforce data systems often categorize race in broad terms, such as Asian American, without distinguishing between specific ethnic subgroups such as SEAs (e.g., Cambodian, Hmong, Lao, Vietnamese). This lack of granularity obscures the unique experiences and needs of SEAs. As previously mentioned, the OMB’s updated SPD 15 requires federal agencies to collect detailed disaggregated racial and ethnicity data as the default.¹⁹ However, the categories for Asian American only go far enough to include one SEA group, Vietnamese, among those with checkbox options. Other major SEA ethnicities (800,000 Cambodian, Lao, and Hmong) continue to be invisible in data collection and reporting. Specifically, under SPD 15, Hmong is provided only as an example for the “Another Group” checkbox or for the write-in option, if an agency will even choose to provide one; Cambodian and Lao/Laotian are entirely left out.
- **Data aggregation, underreporting, and misclassification:** One of the main hurdles for underreporting of SEAs in CTE pathways is by design — aggregating student racial and ethnic data into broader categories leads to the erasure of SEA communities.²⁰ Factors such as language barriers and administrative practices that lump ethnic groups together can lead to the underreporting of SEAs. It is crucial that these data systems specifically provide a checkbox or write-in option for SEA young people to self-identify.²¹
- **Limited cultural responsiveness:** Education and workforce agencies may lack cultural sensitivity and awareness when engaging with and accurately representing the experiences of SEA students. This can contribute to gaps in data collection and reporting. Additionally, a lack of diversity in the CTE workforce, such as counselors and instructors, can impact recruitment, access, and retention of youth in CTE pathways.

Lack of cultural competency may also affect other populations, such as immigrant and refugee students.

Immigrant Populations

Current CTE pathways data systems do not reflect or account for other specialized populations, such as immigrant and refugee populations. This may include undocumented students, students who have recently arrived in the U.S., and EL students. More specifically, they are comprised of:

- **Undocumented students, newcomer students, and other immigrant students:** Incorporating undocumented and other immigrant students into CTE pathways’ data systems requires sensitive but inclusive approaches that prioritize confidentiality and support. The 1982 U.S. Supreme Court

decision in *Plyer v. Doe* held that states cannot deny students a free public education on account of their immigration status, but research on participation in other public programs, such as the Supplemental Nutrition Assistance Program (SNAP), Medicare, public housing, and the decennial U.S. Census, has shown chilling effects of immigrant families' participation when questions around immigration status are involved, regardless of their actual immigration status.²² To understand how CTE pathways serve immigrant students and identify areas for equitable improvement, CTE programs should securely collect student-level data, even when the data cannot be reported within that moment due to confidentiality risks. Collection of such data will still allow for future pooling of the data across time for these student groups, so that policymakers are equipped with the information they need to better support immigrant students without threatening their safety. Data systems must be sophisticated enough to both collect and use this data to provide on-ramps and supportive services as needed by this unique population of students.

- **English Learners and multilingual learners:** English Learner students may have distinct unmet needs in CTE programs. For example, in Oregon from 2011 to 2018, EL students showed persistently lower rates of participation and concentration in CTE programs than non-English Learners.²³ Within schools, EL students may be disproportionately shut out of CTE programs by academic thresholds for enrollment, biased counseling, and limited scheduling options, and though EL students were proportionately enrolled in CTE programs in most states prior to the COVID-19 pandemic, insufficiently available school- and district-level data hamper identification of specific areas with inequitable enrollment of EL students.²⁴ In addition to school-level solutions for increasing access and participation for these students, such as increased language access and culturally responsive counseling to better support ELs' participation in the additional and technical coursework required by CTE programs, CTE pathways' data systems should improve the quality and availability of EL data at smaller geographies to identify where there may be inequities.

Addressing the underrepresentation of Afro Latino, SEAA, and immigrant students in CTE pathways' data systems requires intentional efforts to improve data collection methods, enhance cultural responsiveness among data collectors and analysts, disaggregate data by specific ethnic groups, and engage these communities in the data collection process.

Additionally, policymakers and researchers should advocate for the inclusion of these community perspectives in discussions about education and workforce development to ensure equitable representation and support for all students.



Promising State Policies and Practices

Federal policymakers can look to promising practices from states as examples for intentionally designing coherence across CTE pathways' data systems with an emphasis on equity. Several states have made progress in this field, including Kentucky and Colorado. In addition to improving the federal role in CTE pathways, federal policymakers can incentivize other states to adopt similar strategies for state data systems to advance equitable and inclusive data governance and decision-making.

Kentucky

Kentucky centralizes all its data through Kentucky Center for Statistics (KYSTATS), operating as both the Statewide Longitudinal Data System (SLDS) and a state agency.²⁵ Kentucky stores, connects, and produces reports covering education and workforce topics, many of which are disaggregated by broad racial demographics. While its demographic categories are not yet as detailed as recommended in this paper, Kentucky does collect data on race, gender, socioeconomic status, homelessness, and special education status in one streamlined system.

Ongoing political support for the data system has also generated a culture of data-informed decisions across state agencies. For example, Kentucky's community and technical college system invested in building a geographic information system to highlight education and workforce efforts across the state.²⁶ Kentucky also uses its SLDS data to inform policy decisions and resource allocation. By analyzing data trends, the state can identify successful practices and areas needing improvement, ensuring that resources are directed where they are most needed. Further, KYSTATS data is publicly accessible, enabling wide access to education, economic, workforce, and community partners to see where potential gaps for demographic groups might exist.

Colorado

Colorado focuses on equity-focused metrics and indicators in its collection of data for racial groups through the Launch Initiative.²⁷ This includes tracking disparities in, for example, CTE participation, completion, and outcomes among different racial groups to inform policies and practices aimed at promoting equity and inclusion.

Colorado’s approach to collecting data for racial groups also reflects the state’s emphasis on local control and autonomy in education. Local educational agencies (LEAs) have flexibility in how they collect and report racial data based on their specific needs and priorities — and the subgroups they want to collect. Colorado also prioritizes community engagement and stakeholder input by involving diverse stakeholders, including educators, parents, students, and community organizations, in decision-making processes related to data collection and reporting.

Colorado emphasizes data privacy and security in its approach to collecting data for racial groups. The state has protocols in place to protect student privacy and confidentiality while collecting and sharing racial data. Additionally, Colorado recently passed HB 24-1403, requiring the Colorado Department of Higher Education and Colorado Department of Education to enter into data-sharing agreements to identify and support prospective students experiencing homelessness so that they can access financial aid throughout their postsecondary journeys.²⁸ This legislation is an example of how states can use data they already have to provide students with the supports and services they need to be successful in their postsecondary careers.

Federal policymakers can take Kentucky and Colorado as examples of fostering collaboration among agencies responsible for education and workforce development to promote data sharing and coordination of CTE pathways efforts. Through interagency agreements and partnerships, Kentucky and Colorado facilitate the exchange of data to support decision-making, program evaluation, and alignment of CTE pathways with workforce needs.

Federal agencies can also streamline and cross-share interagency data as well as provide guidance and examples for states to follow through with their SLDSs. Federal policymakers should go beyond these state examples by explicitly asking states and federal agencies to collect more granular data on race, ethnicity, and newcomer and EL students’ statuses. States aiming to advance equity may use federal guidance as an incentive to work with LEAs and CTE programs to collect and report more customized data that is relevant to the specific communities they serve.

Recommendations

Ensuring data equity in CTE pathways is a critical step toward creating an inclusive and effective education and workforce ecosystem, and federal policy is key to fulfilling that vision. Two pillars can guide federal policymakers in using data to create more equitable CTE pathways' data systems: 1) centering equity in data systems' interoperability and 2) supporting unique student populations.

1 Centering Equity in Data Systems' Interoperability

Leverage SLDSs to break down silos among the K-12 education, CTE, higher education, and workforce sectors.

Siloed data systems make it harder to track students' experiences and may obscure inequitable outcomes. SLDSs break these silos by collecting and storing educational and workforce information across various stages of an individual's life. They can be a powerful tool to evaluate how student subgroups are performing and identify subgroups that need closer attention.

Currently, most SLDSs are supported by periodic federal investments via three-to-five-year grants. But these investments are insufficient to incentivize cross-sector data collection or drive meaningful decision-making. To strengthen data equity, policymakers must expand and bolster investments in SLDSs. Shifting from the lens of "data for compliance reporting" toward a lens of "leveraging data to improve outcomes" facilitates greater collaboration and a more cohesive intergovernmental workforce data system. More specifically, this can be done by:

- **Implementing common data standards, codes, and crosswalks:** Standardization facilitates more seamless data-sharing, easier and faster analyses, and greater alignment between educational outcomes and workforce needs. Federal agencies such as the Departments of Education and Labor can issue guidance encouraging states to combine education and workforce data where possible and clarifying wherever there may be legal or privacy questions. Common language and design for questions on race, ethnicity, and nationality will allow better identification and support of populations like Afro Latinos and SEAs.
- **Connecting states and regions:** Data systems that are connected across states, such as the U.S. Department of Labor's State Wage Interchange System, provide a broader perspective on regional trends and can help identify areas of need that may not be visible within isolated data sets. Expanding SLDSs to connect these systems across states would not only highlight regional trends, but also ensure that subsequent analyses are more accurate at identifying disparities.
- **Encouraging cross-agency and cross-state collaborations:** Cross-state collaboration is particularly important for bordering states that converge in metropolitan areas. People in the

New York City area, for example, may work or reside in New York, New Jersey, or Connecticut, just as people in the Memphis area may work or reside in Tennessee, Mississippi, or Arkansas.

I Incentivize meaningful collection, reporting, and analysis on equity gaps.

Data collection efforts must be targeted toward identifying inequities to help stakeholders understand where the most significant gaps exist and what resources are needed to address them. Federal agencies can incentivize this through issuing guidance or integrating requirements into existing grants, thereby fostering a culture of accountability and continuous improvement.

Policymakers could also incentivize states by offering additional funding to increase staff capacity or to improve data systems, or through reducing the burden of reporting certain requirements where feasible. More specifically, they could do this by:

- **Encouraging disaggregation of racial and ethnic groups and subgroups, traditionally underserved groups, and non-traditional students:** OMB’s March 2024 update to its SPD 15, for example, is a step in the right direction. Among its changes is a requirement to collect greater details on race and ethnicity to allow for data disaggregation during analysis.²⁹ These changes set new standards for data collection across federal agencies, which can then be leveraged to better understand gaps in access to CTE pathways and programs. However, the updated rule clearly specifies that the standards are for *minimum* detailed race and ethnicity groups. Agencies should aim to collect race and ethnicity data beyond the default subgroups to accurately understand and support the full diversity of today’s students.
- **Offering technical assistance to help states improve their data collection and analysis practices:** States have little to no capacity to collect and make meaning of high-quality data, create actionable data sets, and align with research-based practices. The Data and Accountability Community of Practice hosted by Advance CTE provides a blueprint for supporting states. In virtual workshops, state leaders gather to learn how to analyze their CTE participation data and identify opportunity gaps.³⁰ Federal technical assistance could similarly support state officers by identifying barriers to modernization, creating toolkits or other resources, and highlighting best practices to ensure data equity.

I Use data analyses to identify next steps and take action.

Collection, reporting, and analysis alone do not make a difference in people’s lives — the data must guide future investments, rulemaking, policies, and services. This can be done by:

- **Highlighting student supports and interventions that directly target barriers to entry or access:** For instance, the Arkansas Career Pathways Initiative offered “holistic case management,” which included transportation, childcare, supplies, mentoring, and individualized counseling.³¹ As a result, the participants of color “attained more education, earned more, and had higher rates of employment than nonparticipants.”³²

- **Calling out occupational segregation and employment trends:** In 2015, an analysis of labor and workforce data found that Minnesota had severe disparities in economic opportunity.³³ In response, Minnesota’s legislature and governor collectively invested \$59.3 million into Equity Grants, which provided funding for education, training, and support services.³⁴ Although the full impact of the Equity Grants has yet to be assessed, preliminary analyses have found a drop in employment disparities for Black and Hispanic workers.³⁵
- **Regularly evaluating for continuous improvement:** Regularly assess the effectiveness of pathway services and interventions for unique student populations through data analysis, student feedback, and stakeholder input. Use evaluation findings to make data-driven decisions, refine practices, and allocate resources to improve outcomes in pathway programs.

2 Supporting Unique Student Populations

1 Disaggregate data by detailed race and ethnicity, EL status, language proficiency, and other relevant variables to better understand the needs and experiences of underserved students.

This can inform targeted interventions and resource allocation to support diverse students’ academic and career success, and can be done by:

- **Disaggregating race and ethnicity data at the point of collection:** CTE programs should ensure that demographic questions offer respondents clear and disaggregated response options for self-identification. The revised default race and ethnicity question format required by OMB SPD 15 is a promising start, but CTE programs should aim to provide more checkbox options under each minimum race and ethnicity category, particularly for subgroups with significant populations in a certain region.³⁶

1 Implement confidentiality protections for undocumented and immigrant students.

Robust confidentiality protections ensure that sensitive information about students’ immigration status is safeguarded and not shared with immigration authorities, law enforcement, or other unauthorized entities. Students should feel safe and secure disclosing their status without fear of repercussions. More specifically, this can be done by:

- **Offering anonymous reporting options for students to voluntarily self-identify immigration status without disclosing personal information:** This can help capture more accurate data on the immigrant student population while respecting their privacy and safety concerns.
- **Ensuring compliance with federal and state privacy laws:** These laws include the Family Educational Rights and Privacy Act and *Plyer v. Doe*, which protect the rights of undocumented and immigrant students to access education and prohibit discrimination based on immigration status.

- **Recognizing the unique challenges and traumas experienced by undocumented and immigrant students:** These challenges and traumas include fear of deportation, family separation, and language barriers. Incorporate trauma-informed practices into data collection and support services to create a safe and supportive environment for these students.

I Design culturally and linguistically responsive data collection.

Data-collection instruments and processes should be culturally and linguistically responsive to the diverse backgrounds of ELs, SEAs, and immigrant students. Policymakers should provide language support and culturally relevant materials to facilitate robust participation in data collection activities.



Conclusion

Afro Latinos, Southeast Asian Americans, immigrant learners, and other students of color should have the same opportunities as their peers to thrive and succeed in their educational and career goals. But current data systems are incapable of helping decision-makers understand the barriers these traditionally underserved populations face in CTE pathways. Investing in robust, integrated data systems is essential to creating an education and workforce system that tracks and supports individuals throughout their journeys, addresses systemic inequities, and promotes inclusive economic growth.

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