

APPENDIX C

Responses to Field Recommendations from Web Site and Statewide Hearings

Topic 1: Vision and Goals

Recommendation: In considering the vision for California's CTE system, the emphasis shouldn't be on "getting a job" that "makes a lot of money," but also include the idea that purposeful life includes many other distinctions and it is bigger than workforce preparation.

- » Vision and mission statements expanded to include these concepts. (Pg. 51)

Recommendation: CTE needs to be more clearly defined and linked to the broader education system, as opposed to being discussed as a separate system.

- » Added clause in Preface highlighting salient features of CTE. (Pg. xi)
- » Added paragraph in the beginning of Chapter Three (Pg. 50) that discusses CTE as a strategy that is integrated within the fabric of our educational system, for the benefit of all students. (Pg. 50)
- » Changed "CTE students" to "students in CTE programs." (Pgs. 26, 70, 79, 83, 84, and throughout the document)
- » Stressed the role of CTE in student engagement, in addition to workforce development. (Pgs. 52, 57, 63, 85, 131 and throughout the document) (Pgs. 2, 5, 10, 15, 16 and throughout the document)

Topic 2: Skills/Degrees Needed

Recommendation: The plan needs to more adequately address and include "soft skills," academic achievement/skills, as well as innovation, creativity, and entrepreneurship in foundation competencies, and ensure that there is a common definition for "readiness."

- » These soft skills were reinforced. In addition, 21st Century Partnership skills were updated in Chapter Three, as well as "Career Guidance" (Pg. 72), and reference was added to the CTE Model Curriculum Standards' "foundation standards." (Pg. 13, 66, 73, 77)

Recommendation: The plan seems to emphasize students completing a four-year degree as a formal objective for all high school students. The plan should also refer to other concepts, such as ways that students productively contribute to society without having a four-year degree.

- » Ensured that text emphasizes preparation for both employment and postsecondary education and avoided the concept of “college” in favor of “postsecondary education” to convey that all forms of postsecondary education are encouraged, not only four-year degree programs. (Pgs. vii, 2, 6, 7, 13, 31 and throughout the document)

Topic 3: Needs of Rural Counties

Recommendation: There should be stronger rural representation in the plan to avoid policies driven by the urban model.

- » Included the need for innovative delivery strategies, including greater use of distance education, to serve rural counties. (Pg. 34)
- » Cited the need for attention to faculty recruitment in rural areas. (Pgs. 114, 149)
- » Expanded the definitions used for “rural” to identify the eligible recipients in rural and sparsely populated areas required by Sections 131(c)(2) and 132(c)(2) of the Act to include 33 – Town, Remote: Territory inside an urban cluster that is more than 35 miles from an urbanized area. (Pg. 200)

Topic 4: The CTE Delivery System

ADULT SCHOOLS/ADULT EDUCATION

Recommendation: Adult schools and Adult Education should have a stronger representation in the plan and be given greater recognition for its contribution to CTE and be included as a prominent educational delivery system.

- » In consultation with the CDE Director of Adult Education, adult schools were added as a delivery mechanism throughout the plan, as appropriate. (Pgs. 5, 8, 9, 41, 51 and throughout the document)

Recommendation: Clearly define adult schools and Adult Education, and include more examples of this type of education in the plan.

- » Changed “Adult Education” to “adult schools,” to distinguish this delivery system from that offered to adults through the community colleges. (Pgs. 5, 8, 9, 41, 51 and throughout the document)

Recommendation: Throughout Chapters One through Three, K-12 should be replaced with K-Adult or PreK-Adult.

- » Changed K-12 to K-Adult in various places in the plan. (Pgs. 78, 148)

WORK EXPERIENCE EDUCATION

Recommendation: The plan should highlight the importance of Work Experience Education in providing students with the SCANS skills and with exposure to “all aspects of the industry.”

- » Text added to highlight both of these on pages 6 and 7.

Recommendation: The plan should highlight the importance of connecting Work Experience Education to related classroom curriculum.

- » Text included in Chapter Three, “High-Quality CTE” (Pg. 70), to highlight the need for connection of work-based learning to classroom curriculum. Expand classroom-linked work-based learning and work experience education opportunities through strengthened industry partnerships, effective coordination with ROCP, adult schools, Work Experience Education, Co-operative Work Experience Education programs, and a systematic review of policies and practices that create barriers to access, including insurance, liability, and other issues.
- » Added text in Chapter Five, as follows: **Proposed State Policy.** Exploratory and Vocational Work Experience Education activities may be assisted with Section 131 and 132 funds if they are a planned and listed component of a CTE program, are integral to one or more of the approved sequences of courses in the LEA’s local plan and annual application for funds, and comply with applicable state and federal regulations. Section 131 and 132 funds may not be used to assist General Work Experience Education. (Pg. 228)

REGIONAL OCCUPATIONAL CENTERS AND PROGRAMS (ROCPs)

Recommendation: The importance of ROCPs should be recognized more visibly as a major delivery method for CTE and as a program that serves all high school students.

- » ROCPs referenced throughout the plan as a key provider of CTE. (Pg. 6, 8, 10, 28, 48 and throughout the document)

Recommendation: The plan should address the challenges in sequencing when there are middle schools involved. ROCPs cannot serve middle school students, so they will not have the ability to develop sequences or provide introductory courses at that level.

- » The following text was added: **Proposed State Policy.** Middle (grades seven through eight) school CTE courses may be assisted with Section 131 funds only if integral to approved sequences of courses conducted by a high school. Explanation. Though Section 315 of Perkins IV allows the use of Section 131 funds to assist CTE instruction in grades seven through eight, Section 131(d)(1) restricts the allocation of these funds to LEAs who serve secondary school students, i.e. unified and union high school

districts and county offices of education. As a consequence, middle school participation in the funds is dependent on two factors: the alignment of the “introductory” CTE instruction provided in grades seven through nine with a sequence of high school district (including ROCP) CTE courses approved for the use of the funds, and the high school district’s acknowledgement of the alignment as evidenced by the commitment of a portion of its allocated funds to the middle school instruction. (Pg. 225)

OTHER PARTICIPANTS IN THE CTE DELIVERY SYSTEM

Recommendation: The state needs to consider how it can use the county office of education to support or advise a CTE position that works in partnership with ROP to be a conduit for information from the state, support the local districts in the full development of their programs of study, and be a vehicle for the coordination of a network for CTE K-12 that connects to higher-level education.

- » Highlighted the importance of county offices of education as a broker of CTE services. (Pgs. 7, 11, 67, 98)

Recommendation: It is strongly recommended that community-based organizations (CBOs) be added to the plan as the main entity to provide the soft skills training that the California workforce will require. It is often community-based nonprofit organizations that have been successful at providing soft skills and are able to deal with people on the fringe of society and who need guidance as to how they can become financially secure, taxpaying citizens.

- » Highlighted the importance of CBOs in providing key career exploration and preparation services as part of the overall CTE delivery system. (Pg. 21)

Topic 5: Leadership

Recommendation: Reinstate subject matter units with specific qualifications, including practical experience in the field, in each of the traditional CTE subject matter areas. Specialists are needed to keep the field abreast of new standards, initiatives, funding opportunities, professional development activities, as well as providing technical assistance and support.

- » Language added in Chapter Three under “Leadership” to clarify the role of subject matter specialists and to propose the additional “needed action”: (Pg. 61)
 - » Allocate resources specifically to qualified “subject-matter” (career area) specialists at both the California Department of Education and the California Community College Chancellor’s Office to provide leadership and facilitate communication and coordinate peer-to-peer learning, professional development, advocacy, and industry engagement efforts within their career area; to conduct and coordinate review processes for accountability purposes; and to provide

- subject-matter technical assistance directly to the field when necessary to strengthen program area instruction.
- » Establish agreements with higher education to ensure that leadership in CTE is included within the courses of study required for administrative credentials.
- » Language added under “System Responsiveness to Changing Economic Demands”: (Pg. 111)
 - » Provide additional operational funds to support and expand CTE subject area expertise in the CDE and CCCCCO in order to provide state leadership and technical assistance to the field on maintaining a demand-driven system.

Topic 6: High-Quality Instruction

Recommendation: There should be an interdisciplinary approach to programs of study and they should be defined as comprehensive pathways of academic and technical study organized around broad industry themes. Create incentives for quality programs as well as emphasize true pathway development.

- » The following text was added to Chapter Three: High-quality curriculum and instruction in CTE includes the intentional reinforcement of the cognitive, academic, and technical rigor inherent in CTE and the alignment of CTE with academic and industry standards. It also includes the integration of CTE and academic content through a variety of strategies that foster complementary approaches to teaching and learning – strategies that draw on the best of what both CTE and non-CTE disciplines have to offer. (Pg. 62)
- » **Recommendation:** Add a “needed action” to improve the UC/CSU system for reviewing and approving CTE classes to meet “a-g” requirements. This “needed action” should also include requirements to provide sufficient feedback when classes do not meet “a-g” requirements so that the submitter can determine whether the changes required will be made.
- » Added text as requested, as follows: Continue to strengthen the communication between the University of California Office of the President and high schools and ROCPs on the requirements for “a-g” approval of CTE programs, with a focus on providing specific guidance and feedback to CTE faculty on their course proposals. (Pg. 71)

Topic 7: Career Guidance

Recommendation: Cite the importance of career guidance and CTE training, and strengthen dissemination of nontraditional employment for secondary (including junior high) and postsecondary students, so that it consists of something more than reinforcing the “a-g” message. In addition, AB 1802 should be more prescriptive in the balance of

CTE information with other elements and have a greater emphasis on career preparation rather than supplemental instruction.

- » Ensured that the Career Guidance section and reference to Assembly Bill 1802 addressed the need for guidance in the area of careers and not just academic counseling. (Pg. 48)

Topic 8: Special Populations

Recommendation: Strengthen the focus and reference to nontraditional careers and be more specific regarding nontraditional recruitment and retention strategies so that more attention is paid to improving the access and success of both males and females in nontraditional roles. All approaches and attempts to improve nontraditional students seem to focus on females in male-dominated professions.

- » Text added to ensure that reference to nontraditional careers included mention of male students in high demand careers such as nursing. (Pg. 80)

Recommendation: Allow students in continuation, court and community schools, and those incarcerated by the California Division of Juvenile Justice, especially those in Community Day School programs, to be given attendance/credit hours for the time they spend at jobs/internships.

- » This "needed action" was already in the plan (Chapter Three, "Student Support and Student Leadership Development," Pg. 85): Explore opportunities to serve the needs of students in continuation schools, court and community schools, and juvenile correctional facilities by linking students to open-entry/open-exit programs in local ROCPs, adult schools, and community colleges and providing career guidance and exploration opportunities, including internship opportunities and mentorships.

Recommendation: The plan should describe how the state would allocate additional state leadership funds to provide professional development for LEAs in serving ALL categories of special population students, including funds to provide assistance to LEAs in understanding the new data requirements, interpreting data, and identifying gaps in performance for special populations, provide guidance and support to LEAs in implementing strategies to address performance gaps and serve special populations, encourage students to consider nontraditional careers, and provide LEAs with strategies for nontraditional recruitment and retention.

- » Text was added in "needed actions" under Chapter Three, "Professional Development," as follows: Provide professional development to faculty in differentiating instruction and working with special populations. (Pg. 85)

- » Text was added to Chapter Four about the use of state leadership funds for professional development activity and technical assistance as recommended by the Joint Special Population Advisory Committee (JSPAC). (Pg. 153)

Recommendation: Do not support Vocational English as a second language as there is too much opportunity for abuse.

- » Clarified that this "needed action" pertained to VESL programs connected to specific CTE programs. (Pg. 85)

Topic 9: Student Support and Student Leadership Development/CTSO

Recommendation: Expand and strengthen the student leadership section so that there is equity in funding across all industry sectors, there's a more diverse listing of student organizations for career-related services (for example, list the Future Farmers of America), and that CTSOs are required of all industry sectors at each high school receiving Perkins funds.

- » Expanded the CTSO section and included the need for additional funding and support from industry, as is received by the Future Farmers of America. (Pg. 86)
- » In Chapter Five, included "staff and other necessary operational costs incurred in providing for state and nationally recognized CTE student organizations (CTSOs) and work-based learning experiences" as an allowable use of Section 131 and 132 Perkins funds. (Pg. 222)

Topic 10: Industry Partnerships

Recommendation: Strengthen and clarify the section on advisory committees and industry partnerships so that advisory committees are composed primarily of industry and business representatives in addition to being required members, each subject area has an active industry advisory group to evaluate programs, there is flexibility on how they can convene (for example, virtual meetings, subcommittees), and they're held accountable by providing evidence that they meet regularly.

- » Text added to Chapter Five, as follows: Have extensive business and industry involvement, as evidenced by no less than one annual business and industry advisory committee meeting and planned business and industry involvement in program activities as described in the Guidelines for the 2008-2012 Local Plan for CTE and instructions for the annual application for funds. (Pg. 223)

Recommendation: Reduce the number of advisory committee meetings from two meetings to one meeting. Requiring two annual advisory committee meetings will tax the time commitment of business partners.

- » See response to previous recommendation.

Recommendation: Designate a CTE advisory committee or a certain number of seats on the advisory committee for adult education members. (Pg. 89)

Topic 11: Career Pathways and Programs of Study

Recommendation: There should be an interdisciplinary approach to programs of study and they should be defined as comprehensive pathways of academic and technical study organized around broad industry themes. Create incentives for quality programs as well as emphasize true pathway development.

- » High-quality curriculum and instruction in CTE includes the intentional reinforcement of the cognitive, academic, and technical rigor inherent in CTE and the alignment of CTE with academic and industry standards. It also includes the integration of CTE and academic content through a variety of strategies that foster complementary approaches to teaching and learning – strategies that draw on the best of what both CTE and non-CTE disciplines have to offer. (Pg. 62)
- » Programs of study and pathways defined in both Chapter Three, "System Coherence and Alignment" and Chapter Five. (Pg. 89 and Chapter 5)

Recommendation: Foundation or introductory courses in every career pathway or "Program of Study" should be a district-sponsored course and required prior to CTE capstone courses on the secondary level if not available in middle school. Perkins funds should not be available to those career pathways or Program of Study that are made up only of ROCP courses.

- » Emphasis placed on the importance of CTE in grades 9 and 10 for the purpose of engaging students. (Pg. 92)
- » Emphasized in "Program of Study Requirement," that each program of study must include "not less than one district-funded course." (Pg. 225)
- » Emphasized in "Local funds required in programs assisted with Section 131 funds": "LEA must provide at least one CTE sequence of courses that includes at least one district-funded course, as follows: "Additionally, LEAs must provide at least one course in each industry sector assisted with the funds. The course may be introductory or advanced, and though not necessarily integral to the sequence of courses being assisted with the funds, must be clearly integral to one or more of the sequences of courses offered in the industry sector. While it is expected that most LEAs will comply with these requirements in the 2008-2009 program year, full implementation of the requirement will be delayed until the 2009-2010 program year to provide districts with the additional time needed to add additional courses or revise existing courses." (Pg. 227)

Topic 12: System Coherence and Alignment

Recommendation: Deemphasize the early childhood years, as elementary teachers have little knowledge in CTE and most of CTE occurs in grades 9 through 12.

- » In discussing both the emphasis of the plan on "lifelong learning" and in describing the CTE delivery structure within the K-12 system, early childhood and elementary education are cited as the points of departure for learning and awareness of possibilities. While students are not learning technical skills in these early years, in view of CTE as an authentic learning strategy embedded within the overall educational delivery system, the Resource Group insisted that the foundation for student success must be laid when children are young. That being said, CTE viewed primarily as a technical skill development strategy pertains to the high school and community college years and is discussed in that context. (Pgs. 2, 3, 4, 5, 8 and throughout the document)

Recommendation: In order to qualify for Perkins funding, there should be active, current articulations between all programs from 7-14 and that yearly agreements are in place, including coordination with the industry sector advisory committees and delivery systems between the high school and community colleges to ensure more direct alignment in the programs of study, a focus on Course-to-Course instead of Teacher-to-Teacher agreements to allow for portability, and a systemic, statewide, portable dual-credit system for secondary students.

- » A number of the "needed actions" under "System Coherence and Alignment" speak to these suggestions: (Pg. 100)
 - » Encourage and promote the development of coherent career pathways that foster complementary and integrated CTE and academic content, faculty collaboration, and secondary to postsecondary transitions.
 - » Provide sufficient time for faculty to build cross-segmental and cross-disciplinary collaborations aimed at aligning curricula and programs, as well as models, tools, and professional development to facilitate pathway development.
 - » Define a sequence of CTE foundation courses that begin in middle school, continue through grade 10, and are aligned to secondary and postsecondary career pathways.
 - » Facilitate program-to-program articulation and use model articulation agreements to promote consistency and minimize duplication of effort.
 - » Expand the number of community college CTE programs that articulate to four-year university programs.
 - » Examine concurrent enrollment and "credit by exam" efforts to identify promising opportunities for expansion as well as CTE growth.
- » Chapter Five provides for the following "Proposed State Policy": Each CTE program assisted with Section 131 or 132 funds must incorporate the nine requirements established in Section 135(b) of Perkins IV, including a sequence of courses that

provides students with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills..." The following planning, organization, and instructional elements determined by the state to be critical to high-quality CTE programs are particularly relevant to the suggestion made: (Pg. 223)

- » Have extensive business and industry involvement, as evidenced by no less than one annual business and industry advisory committee meeting and planned business and industry involvement in program activities as described in the Guidelines for the 2008-2012 Local Plan for Career Technical Education and instructions for the annual application for funds;
 - » Be aligned with applicable feeder and advanced-level instruction in the same career pathway;
 - » Integrate the development of CTE and academic skills in order to prepare students for immediate employment upon graduation and for further education or training;
- » Chapter Five also provides for the following "Proposed State Policy": Each LEA receiving Section 131 or 132 funds must provide at least one program of study, as defined in Section 122(c)(1)(A) of Perkins IV, that includes not less than one district-funded course. Programs of study must incorporate secondary and postsecondary elements in a coordinated and aligned, non-duplicative progression of courses that lead to an industry-recognized credential or certificate at the postsecondary level, or an associate or baccalaureate degree. Programs of study must also satisfy the organization and operation requirements specified in policy #3. (Pg. 225)

Recommendation: There needs to be a better delineation of what Adult Ed, Community College, ROCPs, and high school districts do with regard to CTE to avoid unnecessary duplication of CTE courses.

- » In addition to describing the roles of various agencies and segments in Chapter One, the following was included as a "needed action" under System Coherence and Alignment: Specify the respective roles of school districts, ROCPs, adult schools, community colleges, apprenticeships, and four-year colleges in the CTE system. (Pg. 100)

Recommendation: Mention basic CTE course of study requirements with regard to Education Code 51220, and specify program coordination with ESEA/NCLB or the state-required Single Plan for Student Achievement.

- » Education Code 51220 cited and alignment with the state required Single Plan for Student Achievement added in both the System Coherence and Alignment section and in the Evaluation and Accountability section. (Pg. 64)

Topic 13: Tech Prep

Recommendation: The accountability and assessment of Tech Prep needs to be reviewed so the program can be improved or eliminated. More data is needed in order to evaluate Tech Prep performance, but the plan needs to extend the improvement period and allow colleges enough time to get data and information for determination of success and further needs, as well as indicate how the additional data necessitated by the performance indicators will be collected from participants and when it should begin.

- » Tech Prep will remain as a separate funding stream, with benchmarks established to monitor system improvement. The use of Cal-PASS is mandated to facilitate collection of data. (Pgs. 94, 192)

Topic 14: Organizational Design

Recommendation: Include distance learning options for ROCPs. The plan addresses the need for outreach efforts and it also discusses the need to expand distance learning as an instructional strategy for high school and adult students who have multiple claims on their time.

- » Expanded "needed action" under Chapter Three, "Effective Organizational Design," as follows: Promote greater use of technology-assisted and distance learning in all programs, including elementary, middle, and high schools, adult schools, ROCPs, and community colleges. (Pg. 107)

Recommendation: Clarify open-entry/open-exit because open-entry/open-exit classes do not work within the comprehensive school system and the ADA funding method of school financing.

- » Added "where feasible" to the "needed action" regarding open-entry/open-exit classes, as follows: Explore the expansion of open-entry/open-exit strategies where feasible, in ways that maintain the integrity of CTE courses and course sequences and comply with industry requirements; structure and sequence curriculum in modules or "chunks" tied to jobs with multiple entry and exit points, with multiple levels of industry-recognized credentials built into the sequencing of the pathway. (Pg. 107)

Topic 15: Skilled Faculty and Professional Development

Recommendation: Address the need for recruiting and retaining CTE teachers, including having coordinated efforts in credential preparation programs with California State Universities.

- » The following "needed action" is listed under Skilled Faculty and Professional Development": Expand and promote effective and innovative models of CTE teacher preparation to meet the CTE teacher shortage, including the expansion of teacher

preparation programs in the community colleges, articulated with the California State University system. (Pg. 116)

Recommendation: Require a bachelor's degree for all CTE faculty to eliminate a "two-tiered" system; require industry experience.

- » "Needed action" under "Skilled Faculty and Professional Development" stresses the importance of both industry experience and pedagogical skill. (Pg. 116)

Recommendation: The plan must continue to include credential qualifications not only for CTE teachers, but also administrative staff at all levels – district and state; local coordinators of CTE must have a background in one of the five CTE subject matters or the industry sectors.

- » "Needed action" added as follows: Include counselors, non-CTE faculty, and both CTE and non-CTE administrators in CTE professional development whenever possible to foster mutual understanding and alignment of efforts toward the common goal of preparing all students for success. (Pg. 117)
- » Chapter Five: Requirements of Local Educational Agency CTE Programs Assisted with Section 131 and 132 Funds: Each CTE program assisted with Section 131 or 132 funds must incorporate the nine requirements established in Section 135(b) of Perkins IV..., and the following planning, organization, and instructional elements determined by the state to be critical to high-quality CTE programs: Be staffed by qualified CTE teachers, meaning teachers who 1) possess a standard secondary, single-subject or designated-subject credential that authorizes the teaching of the CTE course(s) to which assigned, and 2) can document employment experience, outside of education, in the career pathway addressed by the program *or* other evidence of equivalent proficiency; must meet the minimum qualifications for community college CTE teachers that are established in Title 5 of the CA Administrative Code. (Pg. 223)

Recommendation: Address the need for professional development regarding the implementation of work-based learning and the use of data for program improvement.

- » These are included in the "needed actions" under "Skilled Faculty and Professional Development." (Pg. 115)

Recommendation: In order to qualify for Perkins funding, there should be active membership by the program instructor in a professional CTE organization each school year that funding is granted, instructors should attend a state conference for professional CTE teachers each school year that funding is granted, instructors should have proof of professional trade training in the skill area being taught during the year that funding is granted, and instructors should have their qualifiers on file in the principal's office for public inspection.

- » The plan focuses on the qualifications – including both technical/workplace experience and pedagogical skills for effective instruction in CTE – and the types of professional development required, including peer collaboration (to help bridge the academic/CTE divide) and teacher externships (to provide powerful first-hand experience in the current workplace), as well as the conferences the CTE instructors already attend. In addition, as described, the California Commission on Teacher Credentialing is currently reviewing CTE teacher credentialing requirements. (Pgs. 22, 111, 113, 116)

Topic 16: Accountability, Data, and Student Assessment

Recommendation: Use this plan as an opportunity to test (and study) the potential gains of results-based funding formulas, strategies, and incentives. The plan could provide base funding for programs based on the traditional measure of enrollments, but provide incentive funding for successful demonstration of results.

- » The federal Perkins grant is based on allocations. Accountability is based on student outcomes. There is no provision in the Perkins Act for performance-based funding. (Pg. 195)
- » The Section 131 and, to a large degree, Section 132 allocation formulas are established in the Perkins regulations. (Pg. 220)
- » Under Perkins IV, LEAs who fail to meet established performance levels risk the loss of a portion or all of their allocated funds. (Pg. 223)

Recommendation: Strengthen and identify accountability for the Community Colleges or the Chancellor's Office. Accountability should be the same for CTE programs receiving funding at the community college level as they are for schools at the secondary level.

- » The Perkins Act has specific requirements for accountability that are different for secondary and postsecondary. Both secondary and postsecondary have developed new accountability systems that respond to the accountability requirements in the Act as described in Chapter Four. (Pg. 167-188)

Recommendation: Increase transparency and accountability in the use of Perkins funds and view accountability systems as tools for program improvement. Monitor districts that may be using Perkins as an entitlement program, make documents public electronically, and provide technical assistance.

- » Focused and restricted use of the Perkins funds, accompanied by accountability, including monitoring and program improvement, is a key feature of this plan, as required by the Perkins Act and effective practice. The section on Evaluation, Accountability, and Program Improvement stresses the importance of accountability for program improvement, not just compliance. (Pg. 117; see also "Required LEA Use of Funds" on Pgs. 223-224)

- » The plan indicates that the CDE and CCCCCO will provide technical assistance to local education agencies concerning local receipt, administration, use, and accountability of the Perkins funds and the elements, content, design, instruction, accountability, funding, and success of CTE pathways in the schools and colleges. (Pg. 153)

Recommendation: Avoid redundant data collection systems.

- » The Evaluation, Accountability, and Program Improvement section stresses the importance of building on existing data collection systems. (Pg. 117)
- » Under the Accountability and Evaluation section of Chapter Four, the plan indicates the state's continuing efforts to improve and expand its statewide data collection system, including improving the quality of secondary-level student data and coordination of the exchange of information across education and workforce systems. (Pg. 170)

Recommendation: Minimize the grantees' data collection burden.

- » The plan requires the collection of data that are mandated by the federal Perkins Act. The plan also discusses the need to support grantees in data collection and analysis, including alignment of systems, provision of tools and guidelines, provisions of technical assistance and professional development, and allocation of resources. (Pgs. 128, 169)

Recommendation: Clarify the definitions of indicators to be used; clarify the titles of CTE courses.

- » The plan discusses the importance of clarifying indicators, discusses CTE course criteria (pgs. 122, 123), and sets the stage for the state to address data-related issues.

Recommendation: Clarify the definition of program "completers."

- » The definition of a "completer" is embedded in each of the "Final Agreed Upon Performance Levels Forms" for secondary and postsecondary levels. (See Pgs. 175-185 for the definition of completers.)

Recommendation: Ensure that indicators provide valid measures of outcomes sought and ensure access to timely and reliable data.

- » The plan discusses the importance of identifying indicators that measure outcomes in CTE and highlights the need for sufficient funding for system development, data collection, data analysis, and professional development in the use of data for program improvement. (Pgs. 123, 167-168)

Recommendation: Strengthen access to data across segments for core indicators “since secondary and postsecondary systems don’t talk with their data system”; implement Cal-PASS.

- » The plan specifically emphasizes the need for data collection systems to facilitate cross-segmental data collection. (Pgs. 53, 118, 128)
- » Cal-PASS implementation will be required of all Tech Prep grantees. (Pgs. 169, 170, 192)
- » The plan also emphasizes the need for professional development in the use of data. (Pgs. 170, 177)

Recommendation: The third-party technical skill assessments at the secondary level are an area of concern, as it is unclear what form they will take.

- » Technical skill will be measured by assessments aligned with industry-recognized standards, including the California CTE Model Curriculum Standards; third-party assessments will not be implemented statewide. (Pgs. 78, 175)
- » For secondary education, the state has determined the measure used for technical skill assessments will be the same measure used under Perkins III. In accordance with the Perkins accountability determinations, local agencies will be encouraged to use industry-recognized certifications. (Pg. 125)

Recommendation: The testing requirement needs to be revisited. For data to be consistent across the state, subject-area, course-specific tests need to be developed that address the standards for each course. Not only would this provide reliable data, but it will also give CTE instructors additional guidance with what should be taught, further unifying what is taught throughout the state in CTE.

- » The plan describes model assessment tasks that are featured in the CTE Model Curriculum Framework; the CTE Model Curriculum Standards will also serve as the basis for the development of technical skill assessments. (Pgs. 12, 46, 65, 67, 70 and throughout the document)

Topic 17: CTE Promotion

Recommendation: Strengthen message about role of CTE in academic achievement.

- » Enhanced text to emphasize the need to promote CTE as a means to improve student outcomes. (Pgs. 2, 55, 130)

Recommendation: In order to bring CTE to the level it has the potential to be, much of this will need a change in perspective for stakeholders and that will require a well thought-out public relations campaign involving all parties.

- » The “needed actions” in the Promotion section call for improved communication to all stakeholders about the benefits of CTE and the need for a clear and compelling message that will galvanize support. (Pg. 130)

Topic 18: Distribution of Funds

Recommendation: Reevaluate the split of funds and include the formula and how it was derived in the plan.

- » The formula for distributing secondary funds is defined in Section 131 of Perkins IV. There is no provision for obtaining a waiver of this formula. (Pg. 196)

Recommendations: Make the distribution of Title I funds more equitable by including a secondary distribution formula similar to that for community colleges – based on the number of CTE students meeting economic disadvantage criteria. The funding split between secondary schools and community colleges needs to be shifted. More funds need to be spent at the secondary level where real CTE improvement is desperately needed.

- » As described in Appendix F, the Title I, Part C funds are divided between secondary and postsecondary programs based on a comparison of the CTE course enrollments at the two levels in the last completed program year (2005–06) for which enrollment data are available. This annual enrollment comparison process involves the collection and validation of the enrollments in secondary CTE courses conducted by the unified and union high school districts and ROCPs; and the enrollments in postsecondary CTE courses conducted by the community college districts, adult school agencies, and the ROCPs. Based on a comparison of the aggregated 2005–06 secondary and postsecondary CTE enrollment data, 45.0913551 percent (\$49,639,992) of the 2007–08 Title I, Part C funds were directed to secondary programs and 54.908645 percent (\$60,447,612) of the funds were directed to postsecondary programs. The secondary funds were distributed in accordance with the allocation formula established in Section 131 of the Act. The postsecondary funds were distributed in accordance with the state's approved Section 132 waiver described in Appendix G. Pending USDE approval of the Section 132 waiver extension request described in Section VI(5), the postsecondary funds will continue to be distributed in accordance with the approved alternative formula.

Topic 19: State Policies on Administration and Use of Perkins IV Funds

Recommendation: Increase funding allocations for staff support/staff time and for counseling and guidance.

- » Up to 10 percent of the LEA's Section 131 and 132 allocations may be expended for guidance and counseling for students participating in CTE programs. (Pg. 222)

Recommendation: Regarding the use of Section 131 and 132 funds, change the proposed 15 percent and 85 percent to 45 percent and 55 percent, because to decrease the cost associated with implementing the grant would mean that many school districts would not be able to continue to provide students the support they need to successfully continue in their programs.

- » Up to 85 percent of the allocation must be expended for costs incurred in program-related activities. Student support services are included among these allowable costs. (Pg. 221)

Recommendation: The plan should more strongly support the position that Perkins funds should be used for CTE programs and staff, and funding spent on support should be limited and monitored closely.

- » This was the purpose of the policy regarding the required LEA use of Section 131/132 funds on pages 222-223.

Recommendation: CTE funding should not be used to support ROCP programs and there needs to be more explanation of the MOU process and implications of 131 funds going to ROCP.

- » As a regional educational agency, the ROCP is an eligible recipient of Section 131 funds. Alternatives for ROCP participation in the funds are described on pages 226-227.

Recommendation: Allow ROCPs to access Perkins 131 funds and provide alternative methods for accessing those funds.

- » As a regional educational agency, the ROCP is an eligible recipient of Section 131 funds. Alternatives for ROCP participation in the funds are described on pages 226-227.

Topic 20: Funding

Recommendation: Invest substantially more dollars and resources into CTE in both the community college and secondary systems, including lengthening the high school day and investing more funds on the most current equipment so student can learn the current industry skill standards.

- » The subsection on Effective Organizational Design (Pg. 106) provides a "needed action" related to a longer school day, as follows: "Provide resources and assistance to schools in reorganizing school schedules into 'blocks' or seven- or eight-period days to enable students to enroll in CTE beginning in the ninth grade and to facilitate enrollment in integrated programs." The subsection on System Responsiveness to Changing Economic Demands discusses the need for adequate funding for equipment. (Pgs. 106-107)

Overall, a major objective of Chapters One through Three was to present needed CTE system improvements. The next step will be to prioritize the needed improvements and develop specific recommendations for funding support, as suggested on Pg. 131.