

# Strengthening Career and Technical Education for the 21st Century Act (Perkins V) State Plan

## Index of Public Input (December 1, 2019—January 3, 2020)

At their November 25, 2019 meeting, the California Workforce Pathways Joint Advisory Committee (CWPJAC) approved the Draft Federal Perkins V State Plan and moved the draft forward for public comment, a requirement for plan development under the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). From December 2, 2019 through January 3, 2020, over 350 comments from 90 individual respondents were received on the November 25, 2019 version of the Draft Federal Perkins V State Plan. Comments were made by individuals on their own behalf and sometimes on behalf of their organizations either via submission of an online feedback form, during public comment at one of four public comment sessions, or via written correspondence. The California Department of Education (CDE), Community College Chancellor's Office (CCCCO), and State Board of Education (SBE) staff reviewed every comment and have responded to each one.

Information on each comment below includes:

**Comment Number:** Numeric reference identifying individual comments. Note, some identifiers include an alpha-numeric combination to signal when comments were clustered together due to similarities.

**Comment Source:** Demographic information on the commenter

**Perkins V Application Prompt Number:** Prompt of the federal Perkins V application related to this comment

**Comment:** Comment in original form without editing

**State Recommended Action:** CDE, CCCCCO, and SBE staff responded to each comment in one of the following ways:

- ***Agreed and Added***  
We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.
- ***Clarified***  
We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

- ***Already in Plan***  
 While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.
- ***Local***  
 While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.
- ***Beyond the Scope of Perkins V Application***  
 While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.
- ***Defer—CA State Plan***  
 While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the state level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.
- ***Defer—Perkins V Implementation***  
 While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the state level and in local implementation. As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V.
- ***Systems Alignment***  
 While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.
- ***Accountability***  
 In response to the combined public comment on this section, feedback from members of the CWPJAC, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the SDPL table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

- ***Acknowledgement***

Thank you for your time and sharing your thoughts.

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**Comment Number: 1a**

**Comment Source:** K–12 Instructor (Non-CTE): Arts, Media, and Entertainment; Large organization; California Teachers Association; Oakland, CA Anonymous.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Section 122 (c)(2) of Perkins V requires consultation with a broad range of individuals representing a diverse group of stakeholders, which the statewide advisory committee list in Appendix A is not. The composition of the group does not provide for the kind of balance that assure parity for the voice of classroom practitioners. In a statewide advisory group of over 90 program administrators, there is one classroom teacher. The state must balance the representation of classroom teachers on this very important statewide workgroup to ensure that the voice of the practitioner is heard and integrated into the plan. CDE should hold itself accountable for its stakeholder engagement practices. The failure of the department to appoint only one classroom remains a clear concern. Specific edits: Page 8, last paragraph lines 2 and 3 change “...The SSAC was composed of academic and CTE teachers ...” to “The SSAC includes only one certificated classroom practitioner,....Seeking to reflect the voice and views from classroom practitioners across the state, the design team decided to add targeted stakeholder meetings to the plan development schedule.”

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 1b**

**Comment Source:** K–12 Instructor (Non-CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Efrain Mercado, Sacramento, CA.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Section 122 (c)(2) of Perkins V requires consultation with a broad range of individuals representing a diverse group of stakeholders. ... The Association asserts that the statewide advisory committee list in Appendix A is not diverse; the composition of the group does not provide for the kind of balance that assure parity for the voice of classroom practitioners. In a statewide advisory group of over 90 program administrators, there is one classroom teacher. CTA believes that was not the intent of the statute and certainly is not characteristic of the California way. The state must balance the representation of classroom teachers on this very important statewide workgroup to ensure that the voice of the practitioner is heard and integrated into the plan. The CDE should hold itself accountable for its stakeholder engagement practices.

While the Association appreciates the efforts of the department to include additional teacher sessions, the failure of the department to appoint only one classroom remains a clear concern. The narrative in the stakeholder involvement section is not accurate. The state used a consultative approach for stakeholder involvement, where joint activities were undertaken by both stakeholders groups and the project team which informed the final decisions made by the project team. The plan suggests that extra steps were added for meeting with classroom teachers as part of a purposeful plan to seek stakeholder input.... The reality is that it is easier for a program administrator to attend these meetings than for LEAs to willingly dedicate funding to support the release of classroom teachers. Unlike the single classroom practitioner on the statewide advisory group, no administrator was required to pay for their own substitute. LEAs receive funds from this plan and other CTE revenues; funding leadership activities such as participation on statewide advisory committees is an appropriate use of these funds. The state can clarify that flexibility in multiple guidances connected with the implementation of this plan to enable the release of classroom teachers. Specific edits Page 8, last paragraph lines 2 and 3 change “...The SSAC was composed of academic and CTE teachers ...” to “The SSAC includes only one certificated classroom practitioner,....Seeking to reflect the voice and views from classroom practitioners across the state, the design team decided to add targeted stakeholder meetings to the plan development schedule.”

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 1c**

**Comment Source:** K–12 Instructor (CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Kristin Montoya, Fullerton, CA.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Section 122 (c)(2) of Perkins V requires consultation with a broad range of individuals representing a diverse group of stakeholders. The Association asserts that the statewide advisory committee list in Appendix A is not diverse; the composition of the groups does not provide for the kind of balance that assure parity for the voice of classroom practitioners. In a statewide advisory group of over 90 program administrators, there is one classroom teacher. CTA believes that was not the intent of the statute and certainly is not characteristic of the California way. The state’s failure to balance the representation of classroom teachers on this very important statewide

workgroup should never happen again. Perhaps the CDE should consider how to hold itself accountable for its stakeholder engagement practices rather than merely asserting how well it engages the community. While the Association appreciates the efforts of the department to include additional teacher sessions, the failure of the department to appoint only one classroom remains a clear concern. Such a workgroup cannot be truly representative of the field based on a rationale that these administrators can identify as (think like) classroom teachers. Specific edits Page 8, last paragraph lines 2 and 3 change “....The SSAC was composed of academic and CTE teachers ...” to “The SSAC includes only one certificated classroom practitioner,....Seeking to reflect the voice and views from classroom practitioners across the state, the design team decided to add targeted stakeholder meetings to the plan development schedule.”

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 2**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Work Experience Education Coordinators have been excluded from "every" section of this document. There has NOT been any consultation with ALL stakeholders. Work Experience Education programs: Exploratory, General and Career Technical have NOT been included in any of this process. Our CDE representative, Erle Hall was not included on their Advisory Board. CAWEE—CA Association of Work Experience Educators offered to hold a public comment session during our October 2019 conference in Sacramento.—CAWEE nor Erle Hall was NOT given a reply to our offer. A HUGE miss, for many CTE/Work Experience Educators to have a VOICE, especially when we were in SACRAMENTO. I , a CTE credentialed Coordinator, also emailed CDE Pradeep Kotamraju, requesting a brief meeting while I was presenting at the CTE conference in November, 2019 (Rancho Mirage) It is documented the email was opened and read, but he chose not to give a "courtesy" response . I inquired to speak and attend the Public Comment session for the State Plan, during the CTE Conference in November., and was told I needed to pay the registration fee in order to do so. (Though I was a break-out session speaker at the CTE Conference). It has become very clear Work Experience Education PROGRAMS have been PURPOSELY not included in the process .

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary

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**Comment Number: 3**

**Comment Source:** K–12 Administrator (Non-CTE): Education, Child Development, and Family Services; Large organization (>100 employees). Anonymous.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Please include Students with Disabilities in this—It is imperative!

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 4**

**Comment Source:** Former high school and community college student: Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Unfortunately, I just found out about this just as of today. So I was not given ample time to look at everything, including particularly, this section. But for technical education, it requires everyone, including, but not limited to, people with developmental and intellectual disabilities to know algebra, geometry and even trigonometry. So Courses, and perhaps special curriculums need to be developed. Even for people like myself that are blind and have a so-called developmental/intellectual disability. Even those like myself that have a developmental delay that can talk well but struggle in other areas.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 5**

**Comment Source:** Postsecondary Administrator (CTE). Anonymous.

**Perkins V Application Prompt Number: A.1.**

**Comment:** For the needs assessment LMI data needs this puts another duty on the Centers of Excellence. The CCC only use LMI for program development. Are there going to be additional funds granted to CoE for additional scope of work?

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 6**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales high School; Fidencio Cuevas.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 7**

**Comment Source:** K–12 Instructor (CTE): California Association of Work Experience Educators (CAWEE). Anonymous.

**Perkins V Application Prompt Number: A.1.**

**Comment:** I don't see any mention of Work Experience Education, which was and is the leader in Career Technical Education Programs. Nobody from the California Association of Work Experience Educators was contacted or consulted on this and they are a major stakeholder in CTE.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 8**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture. Anonymous.

**Perkins V Application Prompt Number: A.1.**

**Comment:** CTE such as ROP teacher from third party agencies or district CTE teachers needs to have stable salaries that matches the single district teachers in order to retain those CTE teachers. Most CTE teachers leave their positions because the pay even after working for more that 6 years of teaching experience and credentials, CTE still are not recognized as regular teachers. The unfair low pay rate and benefits are many of the factors why cte teachers leave their positions. More teachers professional development are need as time goes by.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this

comment requires a combination of policy changes at the State level and in local implementation.

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**Comment Number: 9**

**Comment Source:** K–12 Administrator (CTE): Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Engineering and Architecture; Health Science and Medical Technology; Hospitality, Tourism, and Recreation; Transportation; Tim Reid, Nevada Union High School.

**Perkins V Application Prompt Number: A.1.**

**Comment:** We need to clearly define criteria for alternative leadership development program as laid out in Definition of an alternative to CTSO leadership development—page 6. This is an equity issue and ALL students need to get access to quality leadership training as mentioned on page 65 of the California Perkins V State Plan. This is something that should definitely remain in the plan.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 10**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: A.1.**

**Comment:** I think that the whole system might be broken. At my school the counselors try to direct all students to the college programs. They send thousands of dollars each year taking AVID students to colleges where they just walk around the campus. They miss their current classes but get no real learning other than experience of being on the campus. There is no interaction with instructors or students at the colleges. It seems this \$ could be spent better. How about a class where they come in and view in groups of 10 with a chaperone? With maybe a question and answer session for students. Maybe a hands on 30 minute workshop on what different career paths are like. This money savings could go to getting the students into CTEf programs they want to be in. The districts has a mindset that only college bound students are interested in CTE Pathways. We had a CTE class and the instructor had many students interested but the counselors did not register them into the classes. So eventually the class was turned over to another school. We had a CTE class that had culinary but half the equipment was missing and the teacher was so frustrated she left after a year. The new teacher did the same thing and now the program is gone. The last comment is that our school is

in the beginning steps of Project Lead the Way Programs but there is no real help or guidance to get this pathway created and articulated with the local colleges. The link to this survey needs to be emailed to each teacher in California to get the best feedback possible.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 11**

**Comment Source:** Educational Services Provider, (both direct and systems): Education, Child Development, and Family Services; Large organization; California Afterschool Network; Bill Fennessy Think Together, Statewide.

**Perkins V Application Prompt Number: A.1.**

**Comment:** After reading the Perkins V Plan, there appears to be a glaring omission of the California Department of Education's Expanded Learning Programs (EXLPs) which serve a significant percentage of socio-economically disadvantaged and minority students in every region of the K–12 system. This clearly does not align with the State's Vision for Education and Workforce Development, which specifically includes EXLPs in the strategies of joint planning, alignment, coordination, and leveraging of funds between Career-Technical Education (CTE) programs and programs of study within the workforce development system. Therefore, the Perkins V Plan should better promote EXLPs which would allow leveraging both the state-funded After School Education and Safety (ASES) programming for K–8 grade students, and the federally-funded After School Safety and Enrichment for Teens (ASSETs) programming for 9th-12th grade students, as an effective vehicle for high quality career education.

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 12**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker, Antelope Valley.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Strong partnerships with industry are required to successfully implement a variety of the requirements under Perkins V, including advisory boards and work-based

learning, among others. This component must be explicitly spelled out in the Guiding Principles, and mechanisms must be provided to maintain these relationships, e.g., tax or other incentives to businesses to participate with LEAs on a consistent, sustained basis.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 13**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: A.1.**

**Comment:** CTE in CA has previously been effective and efficient. In 1982, the Agriculture Incentive Grant was established. The ag teachers, under viable state leadership found in the positions of "consultants for agriculture education". At that time there were also consultants of the other sectors. However, due to poor leadership, misguided intentions and other faux pas, the positions eventually were eliminated. These sectors were then led only by the industry sector leads. The positions of the consultants, similar to the Ag consultants, currently headed by Mr. Charles Parker, need to be reinstated.

**State Recommended Action:** Also in comment #13, 20, 49, 90

While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 14**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: A.1.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 15**

**Comment Source:** K–12 Instructor (CTE): CAWEE. Anonymous.

**Perkins V Application Prompt Number: A.2.**

**Comment:** I see no mention of Work Experience Education when it comes to the allocation of funds and the students in this program are just as or even more qualified and eligible.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 16**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: A.2.**

**Comment:** Work Experience Education programs (Exploratory, General, Career Technical), is and has been a Vocational program since the early 1960's in CA. Now known as a CTE program . Though, CDE—CTE has not recognized nor financially supported Work Experience Education programs with targeted funding. Many local CTE Directors choose NOT to include Valuable Work Experience Education programs within their Career Paths, as a result, financially not fund Work Experience programs at the local levels. Unfortunately, many students enrolled in our WEE programs represent our special populations and will not seek higher education. Do to Realities, they MUST go direct to work and "maybe" take a few community college courses. I understand one of our State Superintendent's focus is our Special populations. Work Experience Education Coordinators have been excluded from "every" section of this document. There has NOT been any consultation with ALL stakeholders. Work Experience Education programs: Exploratory, General and Career Technical have NOT been included in any of this process. Our CDE representative, Erle Hall was not included on their Advisory Board... PCAWEE nor Erle Hall was NOT given a reply to our offer. A HUGE miss, for many CTE/Work Experience Educators to have a VOICE, especially when we were in SACRAMENTO. I a CTE credentialed Coordinator, also emailed CDE Pradeep Kotamraju, requesting a brief meeting while I was presenting at the CTE conference in November, 2019 (Rancho Mirage) It is documented the email was opened and read, but he chose not to give a "courtesy" response. I inquired to speak and attend the Public Comment session for the State Plan, during the CTE Conference in November., and was told I needed to pay the registration fee in order to do so. (Though I was a break-out session speaker at the CTE Conference). It has become very clear Work Experience Education PROGRAMS have been PURPOSELY not included in the process .an Development

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 17a**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture. Anonymous.

**Perkins V Application Prompt Number: A.2.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 17b**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: A.2.**

**Comment:** Funding for upgrading classroom equipment and maintenance of equipment are needed.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 18**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: A.2.**

**Comment:** Funding needs to be used with a plan that is ongoing so the above details do not happen. The plan needs to include not only the materials but how those materials will be used and repaired. It must also include the consumables so that the teachers are not having to spend their own funds to make the programs work. Teachers are masters at finding materials but they should not be paying for them, too. What I have seen is that districts decide on a pathway and hire a teacher. There is no real plan for all the equipment and materials needed. This is why there is so much waste. And yes there is a lot of waste.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 19a**

**Comment Source:** K–12 Instructors (CTE): Engineering and Architecture; Large organization; California Teachers Association; Debra Krikourian, Folsom Cordova USD.

**Perkins V Application Prompt Number: A.2.**

**Comment:** Section 122 (c)(2) of Perkins V requires consultation with a broad range of individuals representing a diverse group of stakeholders. The Association asserts that the statewide advisory committee list in Appendix A is not diverse; the composition of the group does not provide for the kind of balance that assure parity for the voice of classroom practitioners. In a statewide advisory group of over 90 program administrators, there is one classroom teacher. CTA believes the intent for diverse representation as the statute states has not been met and bypasses current California practices. The state must balance the representation of classroom teachers on this very important statewide workgroup to ensure that the voice of the practitioner is heard and integrated into the plan. The CDE should hold itself accountable for its stakeholder engagement practices. While the Association appreciates the efforts of the department to include additional teacher sessions, the failure of the department to appoint only one classroom teacher remains a clear concern. The narrative in the stakeholder involvement section is not accurate. The state uses consultative approach for stakeholder involvement, where joint activities are undertaken by both stakeholders’ groups and the project team who provide information for final decisions. The plan suggests extra steps are added for meeting with classroom teachers as part of a purposeful plan to seek stakeholder input. In reality, it is easier for a program administrator to attend these meetings than for LEAs to willingly dedicate funding to support the release of classroom teachers. Unlike the single classroom practitioner on the statewide advisory group, no administrator is required to pay for their own substitute. LEAs receive funds from the Perkins plan and other CTE revenues; funding leadership activities such as participation on statewide advisory committees is an appropriate use of these funds. The state can clarify flexibility in multiple guidances connected with the implementation of this plan to enable the release of classroom teachers. Specific edits Page 8, last paragraph lines 2 and 3 change “...The SSAC was composed of academic and CTE teachers ...” to “The SSAC includes only one certificated classroom practitioner,....Seeking to reflect the voice and views from

classroom practitioners across the state, the design team decided to add targeted stakeholder meetings to the plan development schedule.”

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 19b**

**Comment Source:** K–12 Instructors (CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Kristin Montoya, Fullerton.

**Perkins V Application Prompt Number: A.2.**

**Comment:** The narrative in the stakeholder involvement section is not accurate. The state used a consultative approach for stakeholder involvement, where joint activities are undertaken by both stakeholders groups and the project team which inform the final decisions are made by the project team. The plan suggests that extra steps were added for meeting with classroom teachers as part of a purposeful plan to seek stakeholder input. The reality is that it is easier for a program administrator to attend these meetings than for LEAs to willingly dedicate funding to support the release of classroom teachers. Unlike the single classroom practitioner on the statewide advisory group, no administrator was required to pay for their own substitute. LEAs receive funds from this plan and other CTE revenues; funding leadership activities such as participation on statewide advisory committees is an appropriate use of these funds. The state can clarify that flexibility in multiple guidances connected with the implementation of this plan.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 20**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: A.2.**

**Comment:** CTE in CA has previously been effective and efficient. In 1982, the Agriculture Incentive Grant was established. The ag teachers, under viable state leadership found in the positions of "consultants for agriculture education". At that time there were also consultants of the other sectors. However, due to poor leadership, misguided intentions and other faux pas, the positions eventually were eliminated.

These sectors were then led only by the industry sector leads. The positions of the consultants, similar to the Ag consultants, currently headed by Mr. Charles Parker, need to be reinstated.

**State Recommended Action:** Also in comment #13, 20, 49, 90

While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 21**

**Comment Source:** Respondent did not provide any professional or identifying information

**Perkins V Application Prompt Number: A.2.**

**Comment:** A question with respect for higher education providing teachers with BA degrees and abilities to teach industrial technology or Industrial arts courses at secondary schools. Will there be provisions allowing or encouraging future teachers to teach the skilled workforce?

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 22**

**Comment Source:** Educational Services Provider, (both direct and systems); Education, Child Development, and Family Services; Large organization; California Afterschool Network; Bill Fennessy Think Together, Statewide.

**Perkins V Application Prompt Number: A.2.**

**Comment:** After reading the Perkins V Plan, there appears to be a glaring omission of the California Department of Education's Expanded Learning Programs (EXLPs) which serve a significant percentage of socio-economically disadvantaged and minority students in every region of the K–12 system. This clearly does not align with the State's Vision for Education and Workforce Development, which specifically includes EXLPs in the strategies of joint planning, alignment, coordination, and leveraging of funds between Career-Technical Education (CTE) programs and programs of study within the workforce development system. Therefore, the Perkins V Plan should better promote

EXLPs which would allow leveraging both the state-funded After School Education and Safety (ASES) programming for K–8 grade students, and the federally-funded After School Safety and Enrichment for Teens (ASSETs) programming for 9th-12th grade students, as an effective vehicle for high quality career education.

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 23**

**Comment Source:** K–12 Administrator (Non-CTE): Linked Learning Alliance; Rachel Zaentz, VP of Communications, Linked Learning Alliance, San Francisco, CA.

**Perkins V Application Prompt Number: A.2.**

**Comment:** Recommendation: Leverage Reserve Funds to Further Strengthen System Alignment. (See page 11, as it relates to reserve funds). In order to supplement and support ongoing efforts in the State, such as the K–12 Strong Workforce Program (SWP), to create a fully articulated and integrated Kindergarten through Grade Fourteen and beyond CTE system, we recommend the State’s current proposed Reserve allocation of 4.91% dedicated solely to postsecondary recipients, be leveraged to incentivize partnerships between school districts and community colleges to address long-term disparities or performance gaps on state-determined performance levels. Historically, reserve funds were prioritized for rural areas and locations with high concentrations of CTE students. Perkins V, however, now allows states to use this funding to provide additional resources and supports to implement promising and proven CTE programs, practices, and strategies in areas with disparities or gaps in performance. We recommend the State utilize the Reserve allocation to issue grants to eligible recipients, that includes both secondary and postsecondary partners, to address long term disparities and performance gaps through the “Essential Elements of a High-Quality College and Career Pathway” framework. More flexibility for support would be valuable, especially in rural districts such as Antelope Valley Unified High School District. As a district that covers 1200 square miles and some rural areas but is not designated as rural it would be beneficial.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 24**

**Comment Source:** K–12 Administrator (Non-CTE): Education, Child Development, and Family Services; Large organization. Anonymous.

**Perkins V Application Prompt Number: A.2.**

Please include Students with Disabilities in this—It is imperative!

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 25**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: A.2.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 26**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: A.3.**

**Comment:** I am thinking that the best way to get input from the teachers is to send every high school teacher in the state a survey. This should include the teachers both teaching CTE and those not teaching CTE so you get the perspective of all teachers. Counselors are included but their questions on the survey should be more specific to how they are directing students to programs....what is the district plan for getting students into the correct programs.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 27**

**Comment Source:** K–12 Instructor (Non-CTE): Arts, Media, and Entertainment; Large organization ; California Teachers Association, Oakland, CA. Anonymous.

**Perkins V Application Prompt Number: A.3.**

**Comment:** The narrative in the stakeholder involvement section is not accurate. The state used a consultative approach for stakeholder involvement, where joint activities are undertaken by both stakeholders groups and the project team which inform the final decisions are made by the project team. The plan suggests that extra steps were added for meeting with classroom teachers as part of a purposeful plan to seek stakeholder input. The reality is that it is easier for a program administrator to attend these meetings than for LEAs to willingly dedicate funding to support the release of classroom teachers. Unlike the single classroom practitioner on the statewide advisory group, no administrator was required to pay for their own substitute. LEAs receive funds from this plan and other CTE revenues; funding leadership activities such as participation on statewide advisory committees is an appropriate use of these funds. The state can clarify that flexibility in multiple guidances connected with the implementation of this plan.

**State Recommended Action:** In response to public comment and feedback from members of the advisory committee, the State hosted an online conversation on October 17 dedicated to collecting feedback and ideas from practicing teachers. See the Plan’s appendix for the list of teachers who participated. Language included in the updated Draft Federal Perkins V State Plan to address the comment.

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**Comment Number: 28**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA. Anonymous.

**Perkins V Application Prompt Number: A.3.**

**Comment:** Since people have until January 2 of the coming year, 2020 to give public comment, then you’re gonna have to either send emails out to all interested parties, that which includes consumers and their families and support teams that support those consumers, or you’re going to have to hold meetings State wide.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 29**

**Comment Source:** K–12 Instructor (CTE): CAWEE. Anonymous.

**Perkins V Application Prompt Number: A.3.**

**Comment:** Communication opportunities could be better. Since school and district personnel have different communication methods and preferences for reaching out to their communities, perhaps also including local and state news coverage and social media would reach more parents, students, and other interested parties.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 30**

**Comment Source:** Respondent did not provide any professional or identifying information

**Perkins V Application Prompt Number: A.3.**

**Comment:** In order to provide a skilled workforce, quality skilled teachers must be part of or included in the plan.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 31**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales high School; Fidencio Cuevas

**Perkins V Application Prompt Number: A.3.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 32**

**Comment Source:** K–12 Administrator (Non-CTE): Education, Child Development, and Family Services; Large organization (>100 employees). Anonymous.

**Perkins V Application Prompt Number: A.3.**

**Comment:** Please include Students with Disabilities in this—It is imperative! We appreciate the commenter’s input. Because students with disabilities are considered a special population in Perkins V, they have been included in Section B3. As such, the concern raised in this comment is already included in the plan.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 33**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: A.3.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 34**

**Comment Source:** (3) K–12 Instructors (CTE):

- Engineering and Architecture; Large organization; California Teachers Association, Debra Krikourian, Folsom Cordova USD
- Education, Child Development, and Family Services; Large organization; California Teachers Association, Kristin Montoya, Fullerton.
- Education, Child Development, and Family Services; Large organization; California Teachers Association, Efrain Mercado, Sacramento, CA.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** The Association feels the state did not thoughtfully respond to the prompts in this section in a way which articulates a clear and thoughtful plan for the transition of high quality ROP programs to the broader CTE vision. The Regional Occupational Centers and Programs, which for 40 years have offered a wide range of career classes from cosmetology to engineering as part of the high school curriculum, no longer

receives dedicated funding. The loss of dedicated funding “has accelerated the demise of individual high school classes such as automotive shop. The loss of dedicated funding for the career centers and programs is part of the recent overhaul of California’s complex school finance system aimed at giving school districts more control over how they use state funds. The decline reflects a shift in the state’s priorities away from traditional occupational classes such as auto shop or carpentry to career-oriented programs which place students on a college track. Some stakeholders contend this shift is needed to ensure students have as many options as possible when they graduate from high school. The plan narrative does not adequately explore why the remaining Regional Occupational Centers must compete with other district priorities. Regional Occupational Centers and programs will remain viable if they provide courses key to local economic growth and maximize opportunities for students; but if they fail to do so, they will close . . . . For example, ROP programs have disappeared in San Diego County and Los Angeles County. Long Beach ROP and East Bay ROP in Oakland—have closed. The closed ROP programs (e.g., truck driving) did not meet CTE guided pathways and simply lost funding in high schools unless industry partners fill the void in funding. CDE should examine if the loss of these programs are overlooking students who want to be prepared to enter the work force or a short-term training program directly out of high school. Specific edits: Page 15 paragraph 2, line 3, add “...demands. Whether a school district or county office of education is considering maintaining an existing CTE program or starting a new one, CTE is a critical component of a broad and deep school curriculum which prepares all students to be career and college ready.”

Page 29: Several California Community Colleges are now offering specialized Bachelor’s Degrees. These degrees are not offered in any UC or CSU. All programs began the 2017-18 academic year.

- Airframe Manufacturing Technology, Antelope Valley College
- Automotive Technology, Rio Hondo College
- Biomanufacturing, Mira Costa College
- Biomanufacturing, Solano College
- Dental Hygiene, Foothill College
- Dental Hygiene, West Los Angeles College
- Equine and Ranch Management, Feather River College
- Health Information Management, Mesa College
- Health Information Management, Shasta College
- Industrial Automation, Bakersfield College
- Interaction Design, Santa Monica College

- Mortuary Science, Cypress College
- Occupational Studies, Santa Ana College
- Respiratory Care, Modesto Junior College
- Respiratory Care, Skyline College

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

We appreciate the commenter’s input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

**Comment Number: 35**

**Comment Source:** K–12 Administrators (CTE): Large organization; Pam Knapp, San Joaquin County Office of Education.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** On page 18 the following statement is made: "The **Comment Source:** K–12 system also supports apprenticeship opportunities through ROCPs, California Partnership Academies, and district adult school programs, providing on-the-job training in hundreds of occupations." Then on page 22 information is provided about Pre-Apprenticeship programs; on page 28 information is written about the CAI—California Apprenticeship Initiative grant through the CCC; then on page 38 a detailed explanation of apprenticeships is written. Moving forward, California needs to include a program for high school students to become registered apprentices, starting at the age of 16, and these efforts need to be supported by Perkins, CTEIG, and the K12 SWP. San Joaquin County Office of Education received a CAI for 2020-2022 that was specifically written to implement a high school apprenticeship program, with the goal to replicate state-wide. Area school districts have agreed to partner with this grant to promote and support the inclusion of a high school apprenticeship program as part of the CTE curriculum. These efforts were started through the local Workforce Development Board (WorkNet) by a committee tasked at determining the feasibility of hiring high school students as apprentices. Through the guidance of staff at the Department of Industrial Relations Division of Apprenticeship Standard, the Assistant Secretary of Labor for Apprenticeship at the California Labor & Workforce Development Agency, Partnership for Advancing Youth Apprentices at New America, and local apprenticeship committees, the CAI was submitted and approved for funding. It is the intent to use these grant funds to replicate the programs in Washington and Colorado whereby high school students become

registered apprentices and are enrolled in OJT and RSI starting their junior year in high school. These efforts are in the preliminary stages; however, they are in direct support of established CTE and pre-apprenticeship models, therefore it is suggested these efforts be included in the Perkins V plan.

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 35b**

**Comment Source:** K–12 Administrators (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** I believe that employers are concerned not just with "basic" academic skills, but rather with "fundamental" ones that allow higher-order academic and technical skills to be built upon them for success in the workforce. In addition to the introductory WBL experiences outlined above in this section, there should be additional emphasis on the continuum of WBL experiences that are more involved/complex which should be available at some level to all students throughout K–12 (e.g., job shadowing, informational interviews, PBL, internships, youth apprenticeships and pre-apprenticeships). Reference to Vocational Deans seems a bit out-dated, as it would seem that most use either "CTE" or "Career Education/Workforce Development". There should be additional effort placed toward streamlining apprenticeship and pre-apprenticeship/youth apprenticeship programs across educational segments to make them more effective for the students.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 36**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** I think that the whole system might be broken. At my school the counselors try to direct all students to the college programs. They send thousands of dollars each year taking AVID students to colleges where they just walk around the campus. They miss their current classes but get no real learning other than experience of being on the campus. There is no interaction with instructors or students at the colleges. It seems

this \$ could be spent better. How about a class where they come in and view in groups of 10 with a chaperone? With maybe a question and answer session for students. Maybe a hands on 30 minute workshop on what different career paths are like. This money savings could go to getting the students into CTE programs they want to be in. The districts has a mindset that only college bound students are interested in CTE Pathways. We had a CTE class and the instructor had many students interested but the counselors did not register them into the classes. So eventually the class was turned over to another school. We had a CTE class that had culinary but half the equipment was missing and the teacher was so frustrated she left after a year. The new teacher did the same thing and now the program is gone. The last comment is that our school is in the beginning steps of Project Lead the Way Programs but there is no real help or guidance to get this pathway created and articulated with the local colleges. What is the plan for getting the training for the students? Employers are coming forward with the qualifications that students must have but due to the starting and stopping of the programs at the will of the district, students miss the skill development. The link to this survey needs to be emailed to each teacher in California to get the best feedback possible.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision

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**Comment Number: 37**

**Comment Source:** K–12 Instructor (CTE); Manufacturing and Product Development; Plant Manager; Small organization; CITEA. Anonymous.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** 1.) District-Supported High School Programs: All should be required to have a dedicated CTE Coordinator to manage and coordinate CTE Programs within the LEA and community. 2.) Regional Consortia: Define How are these groups established? Are they academics or industry? How will the public/CTE teachers or LEAs have any input or learn about their Regional CTE Needs? 3.) I'm on the North Bay Area teaching Advanced Manufacturing and being put out on business by a school system who is focused primarily on UC/CSU. CTEig Funds are great but without the administrations' support and involvement, this NIMS accredited, PLTW, SME, SKillsUSA, HTEC will fail when I retire soon.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 38**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** As the education and training programs across K–12, CAEP, and the California Community Colleges are expanding to prepare the number of students and others that will be needed to meet employer demands for a prepared and trained workforce, it is important to recognize that diversity of students is expanding. As a result of more inclusive educational opportunities, more students with autism spectrum disorder (ASD), intellectual and other developmental disabilities are completing high school and are seeking equitable access to workforce training and job opportunities. Resources should be devoted to providing the professional development training that educators will need to provide education, counseling, and training to a more diverse student body. In the Perkins V implementation guidelines, and educational and training activities, categories of students should be articulated to include students with disabilities (including autism, intellectual and other developmental disabilities). Equitable access and equity can be advanced if students with these characteristics are included in the language of the implementation guidelines and the State Plan.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 39**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** My experience suggests, that program administration should be a partnership between three agencies. The Department of developmental services, the department of education and the department of rehabilitation. In fact, since we are dealing with people that were born with their disabilities, I think that the department of RE Habilitation, should be switched to just the department of habilitation, because rehabilitation should be for people that who is disabilities occurred after their 18th birthday, or as in this case after they reached their 22nd birthday, as special ed serves

kids until age 22 Years old, If necessary. That's not to say that every student should be mandated by law to stay in school until they're 22 years old. But it's time that the Department of developmental services, Thruway if it's 21 private nonprofit regional centers be involved in a developmentally/intellectually disabled child's life from the time they're diagnosed moving forward. And that this means being a part of their school activities. This will mandate and require a change in law. As always, the Department of Education should do everything that they can within their power first. If not, then that's where the regional centers need to step in and provide their own expertise and supports. Also, school psychologist and school counselors must have training in dealing with this population. They also should provide assessments and academic and educational performance, and not just behavioral assessments. And like I said at the beginning all three departments must all play a part in program administration and program development. Those being California department of education, California Department of developmental services and California Department of rehabilitation, switch to California Department of habilitation.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 40**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** On page 29 you discuss the K12 Strong Workforce Program as an ongoing funding opportunity aimed at developing high quality K12 pathways. You never state how much is allocated to this program.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 41**

**Comment Source:** Non-Profit Curriculum & Professional Development Provider, Non-Profit Curriculum & Professional Development Provider, Project Lead the Way, San Diego, CA. Anonymous.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** On behalf of Project Lead The Way (PLTW), we appreciate the opportunity to comment on the draft California Strengthening Career and Technical Education for the 21st Century Act (Perkins V) State Plan. We are thankful for the work done by the California Workforce Pathways Joint Advisory Committee (CWPJAC) and are excited to continue to participate with the California Department of Education (CDE) in the approval of the Perkins V State Plan. Employability Skills PLTW applauds the State’s vision for CTE programs and its recognition that skills such as “communication, critical thinking, problem solving and teamwork” are “essential prerequisites for work” (pg. 15). PLTW students engage in hands-on activities, projects, and problems that are reflective of real-world challenges. This compelling, real-world approach empowers students to learn essential, in-demand skills validated by the world’s leading companies, while also providing an invaluable connection between what students are learning in the classroom today and how it applies to the paths they’ll take in the future. California’s Standards for Career Ready Practice contain many of the skills PLTW students obtain through challenging coursework and measured through PLTW’s innovative assessments such as ethics, teamwork, technology skills, problem solving skills, and critical thinking. Elementary & Middle Grades PLTW appreciates the efforts to include Elementary and Middle grades into the plan (pg. 17). It is important that students are exposed early and often to career awareness and exploration. The State Board of Education (SBE) and CWPJAC have previously emphasized the importance of integrating 7th and 8th grades into the CTE frameworks; however the Perkins V plan does not articulate how far down in grade levels Perkins funding can be used or how those dollars can be accessed in lower grades. The Perkins V authorization allows for funding to be used for students as early as 5th grade to ensure students are exposed to career opportunities early in their education. PLTW asks that the Perkins V plan include language that specifically allows for schools to utilize funding for all middle grades as defined in Perkins V including 5th and 6th grade for articulated CTE career awareness and exploration and teacher development to support such offerings.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 42**

**Comment Source:** K–12 Administrator (CTE); Mary Whited; Merced County Office of Education.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** Pg. 18: K–12 CTE Delivery Structure: Paragraph on CA Division of Juvenile Justice: Research needs to be completed on how many Court Schools actually receive Perkins Funding. Perkins funding is not equitable for these students with the greatest need for CTE. Our organization was dropped from Perkins funding for our Court and Community Schools in 16-17 when we received \$24,138 but dropped under the \$15,000 threshold because we were told we lacked the numbers of ‘completers” we needed. If this is the case, it is just another obstacle to overcome to provide HQ CTE opportunities to the most underrepresented and at-risk youth. Pg. 23: CCC CTE Delivery Structure: Correction to following names of regions: Bay Area Central/Mother Lode Inland Empire/Desert

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 43**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 44**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** WORK EXPERIENCE EDUCATION (WE) CDE needs to clarify whether or not Work Experience is CTE. WE is included in the proposed State Plan, yet school districts are told it is not CTE and the CALPADS course code number are no longer in the CTE range of codes. PRE-APPRENTICESHIPS Please clearly state a definition for

pre-apprenticeship. How does this differ from Youth Apprenticeships? If it does differ will Youth Apprenticeships ever be added to the State Plan? REGIONAL CONSORTIA The seven regional consortia are listed. Should the "Desert" be Inland Empire/Desert? It is listed this way much later in the report.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 45**

**Comment Source:** Research, policy & advocacy organization; Research in higher education and the workforce; Small organization; California Competes; Gail, Oakland, CA

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** While it is great that Perkins V specifically calls out the need to align all of the different programs in secondary and postsecondary education and the workforce, there is a need for coordination or some type of governance structure between the secondary and postsecondary systems and the workforce. Without some form of close coordination between the secondary and postsecondary structures, and the workforce who are in charge of the programs, students can slip through the cracks and ultimately end up in a low-wage job. Close coordination among the programs between secondary and postsecondary education helps avoid duplication of courses and prepares students for the rigor and expectations of postsecondary curriculum. It will also help ensure that students are moving through a seamless education pipeline and gaining the skills and credentials necessary for success in our current economy.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 46**

**Comment Source:** County Office Director for Educational Options/CTE/Adult Ed; Education, Child Development, and Family Services; Large organization; Association of California School Administrators

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** Workforce Development Initiatives As an approved WIOA training provider I find the access to these funds for students with barriers near impossible to navigate. The guidance we are given by our WDB is the process takes no less than 6 weeks and

they are unable to change the process because the process is directed through legislation. For example, one student who came to us for training was turned away from the opportunity to use WIOA funds by the workforce development worker due to the fact that he currently has a certificate in forklift operation, however, while forklift operation is in demand, the pay is quite low for our region. This student was denied access to WIOA funds to up skill his training needs to obtain access to manufacturing mechanic training that would enable his wage to exceed that of the living wage in our community. Our request, please simplify the eligibility process to access valuable WIOA training dollars.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation, and in part to issues outside the purview of Perkins V. The intent of this comment requires a combination of policy changes at the State level and in local implementation. As such, we will defer the applicable elements in this comment for future consideration during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 47**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources.  
Anonymous.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** It is vitally important the properly credentialed teachers are teaching CTE. This is more effective and ensures that CTE and its structure is protected and secure throughout the state.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 48**

**Comment Source:** Director of Alternative Education and Child Welfare and Attendance; Education, Child Development, and Family Services; Large organization; California Association of Supervisors of Child Welfare and Attendance (CASCWA); Evelyn Ocasio, State President of CASCWA, Hayward Unified School District, and all of California for CASCWA

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** PLEASE NOTE, I USED THE FORMAT [[ add: text ]] to designate recommended additional text throughout the survey.

Page 16 These skills, knowledge, and attitudes are essential to success for all working adults across the spectrum of occupations, be they artists, scientists, nurses, or carpenters. They are, further, essential to society in addressing the challenges posed not only by a changing economy, but a changing world. CTE can therefore no longer continue to exist as a separate educational alternative; it must be woven into the very fabric of our educational delivery system. CTE—with its focus on rigorous and relevant content, hands-on learning, supportive relationships, and demonstrated outcomes—can set the standard for the kind of challenging, engaging, student-centered instruction that the CWPJAC recognizes as required for students of all ages to succeed. Integrated thoughtfully with the strong academic preparation and guided by basic principles of youth and adult development, CTE can complement and enhance learning in all disciplines, reinforcing rather than compromising the tenets of a solely academic education while preparing students for their future endeavors. [[ add: There has also been greater recognition that the extremely costly School-to-Prison Pipeline could be significantly reduced if students who have repeatedly presented attendance and other behavioral challenges were seen and supported within the CTE framework as needing to successfully develop related workforce readiness skills as preparation for a real viable future as contributing members of society. ]].

... Page 18 Students in continuation education, opportunity education, county community and court schools, district community day schools, and those incarcerated by the California Division of Juvenile Justice, are often disengaged from school and are at high risk for not receiving preparation for postsecondary education or employment. Therefore, such students have the greatest need for CTE. At the same time, as these schools usually, but not exclusively, are serving students who may be overcoming attendance and/or behavioral challenges, [[ add: which are workforce readiness issues, ]] it is important to have a framework of supportive interventions that are designed to be educational and developmental, rather than to have a punitive framework. [[add: Framing chronic absenteeism rates and incidences of behavioral challenges as showing a lack of development in workforce readiness skills can have a significant impact on reducing the likelihood that a student will drop out of school. Students who exhibit these behaviors have often experienced implicit and even explicit low expectations from adults regarding the students' futures. These students often internalize these negative viewpoints. Educators who frame their interventions positively as supporting students to develop skills they will need in their future careers underscore a belief that the student still has a positive future ahead, just as educators do when they

support students in learning to improve successive drafts of written assignments in an English class. ]] Page 20 In addition, many high schools develop academies and other integrated programs with internal resources, often in partnership with industry or other organizations such as the Linked Learning Alliance. [[ add: Continuation education, opportunity education, district community day schools, and county court and community schools have also shown promise as effective educational options that incorporate a focus on CTE. ]]

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 49**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** CTE in CA has previously been effective and efficient. In 1982, the Agriculture Incentive Grant was established. The ag teachers, under viable state leadership found in the positions of "consultants for agriculture education". At that time there were also consultants of the other sectors. However, due to poor leadership, misguided intentions and other faux pas, the positions eventually were eliminated. These sectors were then led only by the industry sector leads. The positions of the consultants, similar to the Ag consultants, currently headed by Mr. Charles Parker, need to be reinstated. State industry sector leads need to re-establish the "business and industry round table" to provide a CTE voice to the SSPI and the Governor. Previously \$50,000 per sector from Perkins funds was provided for advisory committee convening.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 50**

**Comment Source:** K–12 Administrator (CTE) , Matthew Wells Mountain Desert Career Pathways, Apple Valley, CA.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** Pg. 18—The description of need for continuing education, etc. to access CTE in the final paragraph is appreciated. However, the assessment of the need

surpassing resources is incomplete. The largest issue locally is that the need can't be met by current resources due to access restrictions. For instance, the 2-year/300-hr pathway requirement is overly restrictive, largely due to the often shortened time such students are served in these settings. Additionally, generalizing these students as "usually [...] overcoming attendance and/or behavioral challenges" over simplifies and marginalizes this area of critical need, even with the caveat of "but not exclusively". Solutions lie in not trying to fit these students into the same mold (i.e. square peg in round hole), but exploring other solutions. These students are often unsuccessful in the traditional mold, which is where the funding restrictions currently required are most easily met—comprehensive, traditional high schools. I suggest exploring alternative access routes to CTE funding to expand CTE support of students in these settings, akin to the short-term CTE funding support that is permissible through CAEP, as described on pg. 34... .

... Pg. 20—I suggest modifying the tenor of the ROCP section to have it in support of a section highlighting increased regionalization efforts. Upon reading the section as is, it conveys that regionalization is not lost, because of the ROCPs, but likewise implies something is lost due to LCFF/LCAP changes and reduction in ROCP numbers, celebrating that 49 ROCPs still exist (top and bottom of pg 21)Here's the issue—locally, we have seen regionalization scaling up and improving relationships between K12, CC, Industry, etc. in recent years due to a variety of requirements (e.g. CCPT, SWP, etc.) and acknowledgment of best practices (e.g. reduction in same-type requests of shared industry partners). Additionally, in our area, we formed a regional JPA focused on CTE to increase regionalization and high quality CTE ([www.mdcareerpathways.com](http://www.mdcareerpathways.com)), but, when we inquired about becoming an ROCP, we were informed the state will no longer approve new ROCPs. Thus, I believe this section doesn't tell an accurate story and would benefit from reworking to acknowledging that, yes, ROCPs have great strengths and their numbers have decreased, yet, the power of regionalization continues in various other efforts, continuing and expanding much of that great work. Pg. 25—The priority sectors

lists "Small Business". Our region uses "Business and Entrepreneurship" ([desertcolleges.org](http://desertcolleges.org)), which I believe is more powerful and encompassing for the state economy. Additionally, this feeds well into the CAEP reference to incubation. Additionally, our region reference ICT/Digital Media. It may be worth referencing Digital Media alongside ICT as we've noticed community college partners sometimes restrict ICT to computer science/networking type programs.

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 51**

**Comment Source:** K–12 Instructor (Non-CTE): Arts, Media, and Entertainment; Large organization ; California Teachers Association, Oakland, CA. Anonymous.

B.1.a. (pages 15-39) **Perkins V Application Prompt Number: B.1.a.**

**Comment:** Specific edits: Page 15 paragraph 2, line 3, add “...demands. Whether a school district or county office of education is considering maintaining an existing CTE program or starting a new one, CTE is a critical component of a broad and deep school curriculum that helps prepare all students to be career and college ready.”

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 52**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.1.a.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 53**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** As a person that who is blind and who has, what is called borderline intellectual disability, I’m afraid that the curriculum, Along with any testing materials are going to have to be adapted in a way that people can understand. The teaching methods that may work for people that do not have developmental/intellectual disabilities, sadly, are not going to work for those of us that do have developmental/intellectual disabilities. That even goes for people like myself, that who can speak very well that have a good verbal skills, But that would have a hard time with abstract ideas, abstract thinking and abstract understanding. We understand common sense in the every day sense of the word, but that when it comes to academics,

particularly in the areas of fictitious reading and also in mathematics, that's where I particularly have downfallS. We must also find a way for people like myself and others with developmental/intellectual disabilities to get into universities. I served up to six years on the California Department of developmental services consumer advisory committee. And not at my very last meeting, but at the meeting prior to my very last meeting, someone said, "if you have a learning disability, you do not need to meet the math requirements to get to a university. " we not only need to look at youth better at transitional age, we also need to look at people that have long since left the high school system and have had difficulty in community college.

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 54**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** There are many special needs students that are not even getting into the programs due to the push by the counselors to go college. This appears to be due to that this is where the funding is. Send them to college even though they might fail...this makes the numbers look good so the district gets more funding. If the student is failing a class or two they are placed into AVID instead of CTE Pathway that might stir their motivation.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 55**

**Comment Source:** Community-based organization; Sue Sawyer, Redding, CA

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** We appreciate the detailed descriptions regarding how to include and support members of "special populations." These comments are specific to issues of access and inclusion of students with disabilities. We are concerned that the plan does not describe specific strategies to recruit and provide equal access and support to the students with disabilities. It does not address teaching methodologies (universal design)

and ongoing tutorial support needed for success in CTE classes. We recommend that the metrics used to verify planning is student centered be defined.

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to the draft Perkins V application consistent with statutory requirements.

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**Comment Number: 56**

**Comment Source:** Self-advocates and family advocates of individuals with developmental disabilities, Cindy Smith, Sacramento.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** California has seen minimal growth in the labor force participation rate and employment rate for individuals with disabilities since the recession. The American Community Survey (ACS) reports in 2017, only eight percent of people with disabilities were actively looking for work compared to 18 percent of working-age people without disabilities. The ACS also reports that in 2017, the employment rate of working-age people with disabilities in California was 36.8 percent compared to 77.3 percent of working-aged people without disabilities. In 2018, the Department of Developmental Services (DDS) reports that 16.2 percent of people with developmental disabilities who receive services through the Regional Centers are working. These numbers demonstrate the critical need to ensure individuals with disabilities are fully accounted for and included in all aspects of the Perkins V Plan. •**Recommendation:** Given the data above, for individuals with disabilities, the Council believes the Perkins V Plan should include a goal to have a participation rate in CTE programs at the local agency and statewide level for individuals with disabilities similar to that of individuals without disabilities. To meet this goal, the Council encourages the CWPJAC to create goals for CTE programs to meet the needs of individuals with disabilities and to further increase their participation rate in these programs. The Council also believes that more robust cross-tabbed data needs to be collected regarding individuals with disabilities entry into and completion of CTE programs.

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to the draft Perkins V application consistent with statutory requirements.

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**Comment Number: 57**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** The implementation guidelines and program activities should require substantive levels of coordination and collaboration between K–12, CAEP and California Community Colleges so that students are prepared for the transition to higher education and workforce preparation. All activities should allow for access for diverse populations so that individuals with a range of abilities and disabilities may fully participate. Every effort should be made to provide the supports and training to students so that individuals with a range of disabilities (including autism, intellectual and developmental disabilities) may obtain the skills development needed to participate as members of a skilled workforce.

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to the draft Perkins V application consistent with statutory requirements.

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**Comment Number: 58**

**Comment Source:** Afterschool/Expanded Learning; California AfterSchool Network; Sacramento, CA. Anonymous.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** The state supports collaboration with community partners and youth-serving providers, such as Expanded Learning afterschool and summer programs, to rethink and expand the times, places, and resources students have access to in learning as they engage in career exploration, career pathways and hands-on and work-based learning experiences.

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to the draft Perkins V application consistent with statutory requirements.

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**Comment Number: 59**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** The emphasis on the need for systemic collaboration across K–12 into and through post-secondary and the workforce is well-stated.

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 60**

**Comment Source:** K–12 Administrator (CTE), Matthew Wells Mountain Desert Career Pathways, Apple Valley, CA.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** Pg. 40—The state vision is strong but seems to be missing implicit value for business & industry. I would suggestion adding something to the effect of "thereby becoming key assets to business and industry partners and economic growth statewide."

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 61**

**Comment Source:** County Office Director for Educational Options/CTE/Adult Ed; Education, Child Development, and Family Services; Large organization; Association of California School Administrators. Anonymous.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** Great vision statement

Unable to view the link for 7 "retrieved November 26, 2019."

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 62**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 63**

**Comment Source:** K–12 Administrator (CTE): Large organization ; Pam Knapp, San Joaquin County Office of Education.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** Pages 46-47 discuss JSPAC and goals for ensuring an equitable climate for special populations. Perkins V allows for \$150,000 toward these efforts, and this plan states an additional amount of \$50,000 will be allocated to JSPAC to develop a statewide initiative to recruit students from special populations. It is my opinion \$50,000 seems like a low amount to achieve the important and necessary goals for all high schools and community colleges to successfully meet the needs of ensuring special populations are adequately recruited and educated in CTE pathways and beyond.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 64**

**Comment Source:** Postsecondary Counselor or Career Staff. Anonymous.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** Implementation of CTE programs across the state should be broader in addressing the needs of Special Population students. The number of Special population students continues to increase, specially is the areas of mental health. Support systems

to support this population need to be strengthened thus more flexibility and funding must be dedicated to this population.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 65**

**Comment Source:** K–12 Instructor (CTE): Manufacturing and Product Development; Plant Manager; Small organization; CITEA. Anonymous.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** The vision is great... Achieving this vision will require a leader, not a network of bureaucracy's to independently drive their own agendas. Who will stand up and take charge?

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 66**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** Im confused how they will meet these goals. There is no workforce on the planet that will hire a high school student to do the job of someone more skilled. They could be in our programs for 4 years and STILL not get hired as a chef in a restaurant because they haven't gone to culinary school.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 67**

**Comment Source:** K–12 Instructor (Non-CTE): Arts, Media, and Entertainment; Large organization ; California Teachers Association, Oakland, CA. Anonymous.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** The state did not thoughtfully respond to the prompts in this section in a way that articulates a clear and thoughtful plan for the transition of high quality ROP programs to the broader CTE vision being funded through this plan. The Regional Occupational Centers and Programs, which for 40 years have offered a wide range of career classes from cosmetology to engineering as part of the high school curriculum, no longer receives dedicated funding. The loss of dedicated funding “has accelerated the demise of individual high school classes such as automotive shop. The loss of dedicated funding for the career centers and programs is part of the recent overhaul of California’s complex school finance system aimed at giving school districts more control over how they use state funds. The decline reflects a shift in the state’s priorities away from traditional occupational classes such as auto shop or carpentry to career-oriented programs that put students on a college track. Some stakeholders contend this shift is needed to ensure that students have as many options as possible when they graduate from high school. The plan narrative does not adequately explore why the remaining Regional Occupational Centers must compete with other district priorities. Regional occupational centers and programs will remain viable if they provide courses that are key to local economic growth and maximize opportunities for students; but if they don’t, they will close. Closed ROP programs not fitting within the CTE guided pathways plans simply were not picked up for funding by the high school unless industry partners stepped in. CDE should examine if the loss of these programs is overlooking students who want to be prepared to enter the work force or a short-term training program directly out of high school.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 68**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.1.b.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 69**

**Comment Source:** (2) K–12 Instructors (Non-CTE) and (1) K–12 Instructor (CTE):

- K–12 Instructor (Non-CTE): Arts, Media, and Entertainment; Large organization; California Teachers Association; Oakland, CA. Anonymous.
- K–12 Instructor (Non-CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Efrain Mercado, Sacramento, CA.
- K–12 Instructor (CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Kristin Montoya, Fullerton, CA.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** Page 43, new paragraph: “CTE provides proven models for assisting LEAs in offering programs and curricula consistent with the LCAP requirements: \*CTE helps satisfy the California Education Code (Ed Code) language encouraging districts to provide all pupils with a rigorous academic curriculum that integrates academic and career skills, incorporates applied learning in all disciplines, and prepares all pupils for high school graduation and career entry. \*All CTE programs are prepared in line with CTE Model Curriculum Standards and newly instituted Common Core State Standards requirements. \*CTE courses offer articulation agreements and dual enrollment options for schools to partner with local colleges so students have an early awareness that college is a possibility. \*Students in California Partnership Academies (CPA) were much more likely than their high school peers to complete academic a-g courses needed for admission to California’s public colleges and universities—57 percent to 36 percent. \*Students of Regional Occupational Centers and Programs were typically from lower achieving and lower socioeconomic status than peers, but were just as likely to enroll in postsecondary education and eventually earn higher wages... . \*CTE has been found to increase school connectedness, reduce behavioral problems related to suspensions and expulsions, and reduce dropout rates among all student groups—especially among students most at risk of dropping out.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation and requires more data than is currently available. As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V or during the development of the California State CTE plan.

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**Comment Number: 70**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** Besides using funds provided by the workforce innovation and opportunity act and state funding K through 12 and K through 14, any state and federal funds for public post secondary education and higher education funds must be used, along with any funding, if any provided under the individuals with disabilities education act, that which is a federal law and any state funding to provide supports to persons with disabilities to have, not only supports inside the classroom if necessary, but also supports outside the classroom. All funding streams, state and federal, and even local, both disability related and non-disability related must be used.

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 71**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 72**

**Comment Source:** Postsecondary Administrator (Non-CTE): Dr. Tammy Montgomery, Associate Vice Chancellor, Instruction; Los Rios Community College District

**Perkins V Application Prompt Number: B.1.c**

**Comment:** On July 31, 2018, the President signed into law the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), reauthorizing the Carl D. Perkins Career and Technical Education Act of 2006. The intent of the law is to 'develop more fully the academic knowledge, technical and employability skills of students enrolled in Career Technical Education (CTE) programs of study...(continue on

following page). ...One of the major changes in the reauthorization bill is the expanded scope on allowable projects, services or activities. In Perkins IV, the purpose of funding is for CTE course and program improvement, expansion, development or modernization. Using the AVA Audit Handbook Avoiding Audit Liability, the Chancellor's Office established the three-year rule to reduce the risk of supplanting. This rule states that when the same service or activity has been funded for three consecutive years, as of the fourth year the activities would be considered maintaining/sustaining effort and therefore not an allowable expense. This rule places a significant burden on CTE programs because of the imbalanced cost of operating career education programs relative to general education. The current funding formula rewards enrollments, which are capped at lower levels in CTE courses. When faced with an economic hardship and declines in the state general fund, colleges must decide between offering general education courses (with a higher enrollment cap) or lower enrollment CTE courses to increase total appropriation funding for the college. Unfortunately, as in the case of the 2008 recession, the rational decision to optimize funding led to the reduction of career education courses across the state, at a time when technical skill attainment was severely needed to retrain the increasing number of unemployed. While the new community college funding formula places more emphasis on student outcomes, enrollment is still a substantial variable that will influence local investment decisions. Consequently, a supplemental source of funds is needed to prevent erosion to California's CTE programs that prepare students for living wage careers. The new law states that the Perkins V funds may be used to develop, coordinate, implement, or improve CTE programs. The addition of 'coordinate' and 'implement' in the law broadens the scope of allowable expenditures. In the new law, support beyond three years does not indicate supplanting but rather maintenance of a quality career education program that may not exist without a reliable source of external funds such as Perkins. Consideration is requested for retraction of the three-year rule to prevent unintended consequences that reduce the availability of quality CTE programs. Elimination of the three-year rule will help to ensure access to quality career education programs, often the only path out of poverty for so many of our students.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 73**

**Comment Source:** Anonymous

**Perkins V Application Prompt Number: B.1.c**

**Comment:** We recommend that the plan mandates inclusion of representatives who advocate for students with disabilities are required members of local advisory groups on each LEA advisory Board.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 74**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** An effective, efficient, streamlined, coordinated data system across all segments is a "must" to make these efforts successful, and should be a time-critical priority. It would be great to see the "High Road Training Partnerships" and "Slingshot" initiatives scaled across all educational segments and made available to all micro-regions across the state, not just metropolitan/LMI reporting areas. There needs to be not only more PD, but joint PD across K–12 and post-secondary to increase the success of alignment efforts across segments. Quality indicators/metrics should be streamlined and better aligned across K–12 and post-secondary segments and on into the workforce so that data can be monitored more efficiently and effectively to drive and sustain program improvement. There is a mention of funding being used to provide additional money and flexibility, however, as some of the grant applications are competitive, that can create "winners and losers" in nearby geographical areas (including within a single community college district) which is challenging to have consistent college AND career readiness for ALL students within a particular region. This can be the antithesis of equity and access for all students.

**State Recommended Action:** 1, 3b

We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 75**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** CTE programming should include access to a range of credit-bearing and non-credit courses at California Community College that lead to a certificate, degree, and/or transfer to 4-year institutions. The State Plan should encourage the development of articulation agreements that create and build partnerships across K–12, community colleges, and 4-year institutions.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 76**

**Comment Source:** Representing Students: Michael Funk, Director, Expanded Learning Division California Department of Education

**Perkins V Application Prompt Number: B.1.c**

**Comment:** In the State’s Vision for Education and Workforce Development, page 41 describes the State’s strategy for any joint planning, alignment, coordination, and leveraging of funds between the State’s career and technical education programs and programs of study with the State’s workforce development system, including system alignment. Included in that description is acknowledgement of expanded learning organizations. California’s Perkins V Plan should also leverage the state-funded After School Education and Safety (ASES) as well as the federally-funded 21st Century Community Learning Centers (21st CCLC) and After School Safety and Enrichment for Teens (ASSETs) Expanded Learning programs, which total over 4,500 programs serving over 980,000 students in every region of California.

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 77**

**Comment Source:** County Office Director for Educational Options/CTE/Adult Ed; Education, Child Development, and Family Services; Large organization; Association of California School Administrators. Anonymous.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** WIOA is the best kept secret when it come to high school administration & districts, improve collaboration between LEA's and WDB to increase knowledge of paid and non-paid internship opportunities for high school students. Liability for student internship is one of the largest barriers for employers to agree to hosting high school students in job shadows or internships, using WDB funding the liability is covered by Workforce Development, another "best kept secret" to educators. I certainly support the identification of the need to make CTE a required element for the LCAP and the importance of linking dual enrollment to high school for certificate attainment stackable to a degree.

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 78**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** The state encourages innovative partnerships and relationships with community-based providers and intermediaries such as Expanded Learning afterschool and summer programs that help leverage resources towards achieving the state's vision of student goals for CTE success.

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 79, 80**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

Afterschool/Expanded Learning; California AfterSchool Network; Sacramento, CA.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** I do not think there is enough being done in this area. When there is a conference counselors are the ones attending the conference, not the teachers. There needs to be a plan and it must include the teachers.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 81**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture; Large organization; California Teachers Association; Debra Krikourian, Folsom Cordova USD.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** Page 43, new paragraph: “CTE provides proven models for assisting LEAs in offering programs and curricula consistent with the LCAP requirements:

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 82**

**Comment Source:** K–12 Administrator (CTE), Matthew Wells Mountain Desert Career Pathways, Apple Valley, CA.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** Pg 46: The JSPAC noteworthy efforts seemed to imply that JSPAC resulted in those efforts happening locally. This seems to be overstated as I'm not sure that's commonly the case. If I'm misreading this and this is meant to imply statewide advocacy for such things, that would be more accurate. Those things are happening locally but not commonly as a result of JSPAC.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 83**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.1.c**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 84**

**Comment Source:** K–12 Instructor (CTE): Manufacturing and Product Development; Plant Manager; Small organization; CITEA. Anonymous.

**Perkins V Application Prompt Number: B.1.d.**

**Comment:** Funds are made available for Administrators, Counselors, CTE Teachers, etc. 1.) HOW will they ever know about this PD opportunity 2.) Suggest making it a requirement for all Principals, AP's, and Counselors for 1 PD-Day per year. 3.) Give them a list of local opportunities coordinated by the County Office of Ed's or Regional Consortia.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 85**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture. Anonymous.

**Perkins V Application Prompt Number: B.1.d.**

**Comment:** If CTE teachers' salaries are matching to district teachers, cte teachers will not likely go look for another position. It is truly sad to see rop teachers struggle to make a living when they do they do more than a single subject teachers.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 86**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.1.d.**

**Comment:** It's all plain and simple. Each agency, will help the population(s) that are eligible according to each agency's criteria. For example, DDS will provide supports to those clients that fall under its criteria. The Department of Education will take care of those students that actually qualify for special education from five years old to 22 years old. And, DOR, As it is currently cold, will help those from 16 years old, or 14 years old moving forward. The only gray area to all this, is that you will have people that meet all three criteria, in which case all three agencies will provide all their expertise and supports. The question still remains, of the two Health and Human Services agencies, but which one will the client benefit from the most? That should be left up to the client and his or her family, based upon experience.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 87**

**Comment Source:** K-12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.1.d.**

**Comment:** I do not see any real leadership that is across the board. Everyone talks a good talk but ask them what is really happening and a different story comes out. Again, ask the teachers in a survey statewide to get a picture of what is really happening. If you want to truly change things for the better then you will need to want to get the positive and the negative.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 88**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.1.d.**

**Comment:** Please ensure that LDI is continued within the technical assistance "bucket."

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 89**

**Comment Source:** Afterschool/Expanded Learning; California AfterSchool Network; Sacramento, CA. Anonymous.

**Perkins V Application Prompt Number: B.1.d.**

- i. **Comment:** The state will use leadership funds to increase professional development of CTE administrators and teachers on how to improve parental and community involvement, including coordination with Expanded Learning, community partners, and youth serving providers.
- ii. The state will invest to support local recipients in building more broad collaborative coalitions with eligible partners including workforce, community based providers, Expanded Learning programs, youth serving organizations, educational entities, parents and students as envisioned under the law to leverage community resources and enhance seamless rather than segmented service provision.
- iii. The state will support funds that extend the reach of CTE programming including curriculum which can be used in Expanded Learning afterschool and summer programs.
- iv. The state will support funds that establish partnerships with Expanded Learning afterschool and summer programs to expand access to CTE programming among students from across a district that otherwise lacked access during the school day.
- v. The state will support innovative methods of delivering work-based learning including collaborations with intermediaries and Expanded Learning afterschool and summer programs that connect schools and students to hands-on learning opportunities
- vi. The state will support career exposure programs that coordinate with Expanded Learning afterschool and summer programs to increase youth experiences in a broad range of career pathways.

**State Recommended Action:**

We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 90**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.1.d.**

**Comment:** CTE in CA has previously been effective and efficient. In 1982, the Agriculture Incentive Grant was established. The ag teachers, under viable state leadership found in the positions of "consultants for agriculture education". At that time there were also consultants of the other sectors. However, due to poor leadership, misguided intentions and other faux pas, the positions eventually were eliminated. These sectors were then led only by the industry sector leads. The positions of the consultants, similar to the Ag consultants, currently headed by Mr. Charles Parker, need to be reinstated. State industry sector leads need to re-establish the "business and industry round table" to provide a CTE voice to the SSPI and the Governor. Previously \$50,000 per sector from Perkins funds was provided for advisory committee convening.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 91**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.1.d.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 92**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.1.d.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 93**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture. Anonymous.

**Perkins V Application Prompt Number: B.2.a.**

**Comment:** Provide more work base opportunity for high school students with companies who would hire students for long term.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 94**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.2.a.**

The programs of study, should be based on what each and every student wants to do as a job when they leave school. What’s going to work, or field trips and hands-on demonstrations, not doing worksheets out of a workbook. Again curriculums development is very important, as is testing development. Community colleges, that would have a culinary arts and hospitality management program already do this. There is an academic/lecture portion. And that there is, what is called a lab portion, where students actually do this work in the classroom. This may also depend on what field of work the student wants to go in. If a student wanted to be a captain of a ship, an airplane pilot and or a railroad engineer, this may not be possible. But job shadowing may or may not be feasible.

**State Recommended Action:**

While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 95**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.2.a.**

**Comment:** This is where the real change needs to happen. The planning needs to be in with the equipment and materials. What is happening is there is lots of planning but when the program starts the materials are not there and the teachers are either having to spend their own money or the program will fail. Oh, not right away, it will struggle as students and the teacher gets discouraged due to lack of materials to match the curriculum.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 96**

**Comment Source:** K–12 Instructor (CTE): Manufacturing and Product Development; Plant Manager; Small organization; CITEA. Anonymous.

**Perkins V Application Prompt Number: B.2.a.**

**Comment:** Local control allows eligible recipients flexibility, promotes fiscal responsibility, fosters timely responsiveness to regional needs and local communities, promotes innovative practices, and supports the vision for collaborative regional work. Local Control = Local Politicians / Administrators Control CTE State oversight must be very tight!

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 97**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.2.a.**

**Comment:** Definitely keep the 15 sectors viable, provided they have an advisory committee, a viable and federally recognized CTSO, credentialed teachers and updated and industry recognized curriculum.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 98**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.2.a.**

**Comment:** The response here seems to "beg the question" and doesn't explicitly address the question of how programs of study will be developed for state approval; there could be more clarity on the issue of local development with quality control at the state level. From a clarity standpoint, the final paragraph might be better at the beginning, after some explanation of local control, and then followed by the high quality indicators (as a whole, the document has many grammatical and punctuation errors throughout, which detract from the readability and quality of the responses, in my opinion).

**State Recommended Action:**

While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 99**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.2.a.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 100**

**Comment Source:** Community-based organization; Sue Sawyer, Redding, CA.

**Perkins V Application Prompt Number: B.2.a.**

**Comment:** Include language regarding the recruitment and engagement of students with disabilities.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 101**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.2.a.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 102**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; CATA. Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** I support allowing CTE teachers to be credentialed through traditional and through non-traditional means. The student teaching path doesn't work for everyone. To not allow for hiring/ credentialing through un-conventional means would be detrimental to the modern teaching candidate and the modern family.

**State Recommended Action:**

We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 103**

**Comment Source:** K–12 Instructor (CTE), Agriculture and Natural Resources; California Agriculture Teachers Association. Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** As a CTE instructor I believe it is important to have properly credential instructors teaching CTE courses in order to receive this funding.

I also believe that a CTE program should have a CTSO attached to it that is functioning and being used. These student organizations are key to students learning leadership skills and soft skills that many students don't learn while in high school.

I also am in favor of a CTE program having to have an industry advisory committee. I think that committee should have to meet at least twice per year and keep minutes of those meetings.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 104**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; FFA, California Agriculture Teachers Association (CATA); Noah Grossman, Calaveras High School.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** It is very important that CTE teachers are properly credentialed, to ensure not only expertise, but appropriate pedagogical instruction as well. Inclusion of advisory committees that include industry professionals and community stakeholders is very important, to ensure proper guidance and advocacy for a CTE program. Additionally these advisory committee meetings help connect the school to the local workforce community, creating bonds and avenues for work-based learning, and applicable classroom curriculum. We recently had a CTE advisory committee meeting and it was wonderful to get feedback from local industry about what high school graduates are lacking. And also learn of potential work-based learning opportunities. Additionally it is important to include alternate CTSO options so that more students can become plugged into CTE opportunities and find support to further their interests and education.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 105**

**Comment Source:** Postsecondary Instructor (CTE): CATA. Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** "Be taught by a teacher who meets the CTE teacher credential and occupational experience qualifications, as approved by the Commission on Teacher Credentialing (CTC)." At the K–12 level a teacher that meets the "CTE occupational minimums" still needs education in the area of instruction delivery. Most will have a

knowledge base of occupational experience but lack still set on delivery. These requirements should be future researched and basic education skill sets determine to ensure high levels of students success. Furthermore, in regards to CTSOs-I agree with, "Providing students with these opportunities for leadership development is paramount in addressing the key attributes employers seek." However, I would caution against the alternative leadership programs, if a school/district is able to provide the CTE programs then they must provide the appropriate leadership components tied to the given sector. Furthermore, stronger system needs to be implemented to ensure educators are providing appropriate leadership and community involvement skills.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 106**

**Comment Source:** K–12 Administrator (CTE): Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Engineering and Architecture; Health Science and Medical Technology; Hospitality, Tourism, and Recreation; Transportation; Tim Reid, Nevada Union High School.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Thank you for including some important items necessary for site administration and agriculture departments including ours. First, proper credentialing of CTE teachers—page 54, is extremely important for the longevity and integrity of our agricultural programs. Agriculture education is a very technical profession and teachers that are under qualified often do not last and burn out in a short amount of time. Additionally, they need to be experts in the field so that we can truly teach skills for a career in agriculture.

Industry Involvement (required two industry advisory committee meetings)—page 54, is imperative. Industry involvement in CTE education is vital to insuring that the needs of industry are being met by our CTE programs. We need to ensure students have an opportunity to earn a living wage once completing a CTE program. Increasing the number of required industry advisory committee meetings will help to connect CTE education and industry.

**State Recommended Action:**

We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 107**

**Comment Source:** K–12 Instructor (CTE): Agriculture and natural Resources; Small organization (<100 employees). Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Proper Credentialing is an enormous critical concern to the success of a CTE Program. I have been in this business for a substantial amount of time and have seen how teachers without the proper training continue to destroy our students' futures. I have taught with Designated Subject Teachers who have the proper training and those that do not. A person with Industry Experience does not qualify or quantify a persons ability to teach our students in a way that promotes student success. Many of the Designated Credential Teachers have never had the proper training to meet the needs of students. I would rate our campus at 60% success rate with Designated Subject Teachers. That means that 40% are inefficient and not preparing our students for their Future. We need to take a close look at the system of Designated Instructors Program of Qualification to better service our students. CTSO's are suppose to expose all students. I have seen the importance and purpose diminish. Many CTE programs state they have CTSO but the organizations exist on a piece of paper and there is no activities students grow from. There should be no alternative, because currently students are receiving no benefit from them. The CTSO's were implemented for a purpose and have continued to be part of this document do to the importance of them. If Teachers can not see the importance of CTSOs to our students through Leadership, Parliamentary Procedures, Cooperation, Goals and Objectives,etc; our students' will not be exposed to the same elements they will need in the workforce. Many of our Education Institutions have excellent CTSO running and they are a extreme benefit to our students. I continue to have former students express their gratitude for having to be able to experience in their local CTSO. I believe we have lost a lot of CTSOs because there are many Teachers that have little experience and no Criteria of CTSO. Many do not have any idea what they are, how to form them, the purpose of them, or how to keep them going. We need to address these issues because CTSOs make teachers better teachers, Teachers have a better understanding of our students, and Teachers have a better understanding of our students' futures. Advisory Committees are extremely important to guide the future of our Programs. Many new Teachers do not have a clear understanding of the Advisory committees purpose. I truly believe that we should not go without them. We all need to know the purpose and function of why we have them. Some have never worked with one. Some do not know how to organize and utilize them. Without direction from an Advisory Committee, we have no direction, no

focus, no idea of the needs of our students' future, and no idea of future areas of growth.

**State Recommended Action:**

We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 108**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** On page 50, re: the following definition: "A high-quality college and career pathway consist of a collaborative partnership among community colleges, primary, and secondary schools, workforce and economic development agencies, employers, labor groups, and social service providers." While CTE is not offered at the college level except in community colleges, a high quality college and career pathway (whether from a K12 or community college perspective) must include partnerships with BOTH community colleges and universities. As CTE supports career development for industry fields, many CTE students will transition from either high school or community college into "four-year" institutions. Nearly half of students earning a bachelor's degree from a University of California campus in science, technology, engineering and mathematics transferred from a California community college, and 51% of CSU graduates started at a community college. The CSU system has been an active partner in addressing the need to integrate academic and career technical education, particularly in the area of teacher preparation.

On page 53, in the definition of a qualified CTE teacher, the second criteria notes that employment experience must be documented "outside education" in the career pathway addressed by the program. It is unclear what "outside education" means. Does this mean that work experience in the field of education cannot count toward a CTE credential? (That would be problematic since we need to increase the number of secondary education career pathways). Or does it mean that education does not count as work experience? But wouldn't an internship count as work experience? Why would receiving education units of credit discount the learning? Page 55, the last bullet notes two to seven pathways per industry sector; top of page 56 says three to seven.

Page 58: I appreciate the value placed on UCCI "A-G" courses, encouraging their inclusion in CTE programs. Questions remain, however, regarding who can teach them. If a UCCI or other program course (e.g. CPA program courses) meets both "D" science

requirement and CTE standards, can an appropriately credentialed CTE teacher without a single subject science credential teach that course?...

**State Recommended Action:**

While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V

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**Comment Number: 109**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; California Agriculture Teachers Association; Tom Vazquez, West Valley High School, Cottonwood CA.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Page 53 of the draft Perkins V plan- the Requirements of LEA CTE Programs, to promote continuous improvement in academic achievement and technical skill attainment teachers must be qualified CTE credentialed. Industry experience is vital to be an effective CTE teacher. Educators that are strictly academic do not have a clear understanding of what industry demands from its workers. This is a vital statement in the plan. Also the statement regarding industry involvement through advisory committees is essential. As a CTE teacher of 28 years I came out of industry at the age of 30 to become a teacher. As I have lost touch with what is current in the industry, my advisory committee has kept me up to date with standards that I need to incorporate into my curriculum. Page 64 regarding CTSO's is extremely important to student development. The opportunities for leadership development are proven to be effective as I have seen my own students step into leadership positions in both post secondary education as well as in industry. I believe that the six CTSO's provide students opportunities that an alternative leadership development program can not offer. The regional, state and national opportunities that FFA offers students can't be matched by an alternative program. I believe the statement regarding the alternative program should be removed.

Also, the Cal PADS reporting system does not have a way to include that course as both CTE and academic.

Page 64–65: CTSOs are indeed valuable. Given the importance to California of developing education career pathways, an education specific CTSO such as Educators

Rising is needed. This would also facilitate mentor programs and alignment between secondary and postsecondary as Educators Rising is more common in postsecondary, and is endorsed by both major teacher associations. Also, the CTSO is essential for reaching potential future teachers in STEM or other career pathways—who need to stay in those pathways to gain subject matter competency.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 110**

**Comment Source:** K–12 Administrator (CTE): ROCP CAROCP, Melissa Dix CRY-ROP.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** ii. There is a paragraph on page 62 that mentions CTE Teach. This is a strange place to talk about the state model for CTE Teacher induction. While the CTE Teach PD modules do contain content for CTE teachers about how to differentiate instruction to meet the needs of ALL learners, it doesn't seem to make sense in this section that is focused on promoting and expanding programs to students. However, you will see in more comments below, that CTE TEACH was completely left out of Part 4 where it DOES belong!

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 111a**

**Comment Source:** Non-Profit Curriculum & Professional Development Provider, Project Lead the Way, Elly Garner San Diego, CA..

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** On behalf of Project Lead The Way (PLTW), we appreciate the opportunity to comment on the draft California Strengthening Career and Technical Education for the 21st Century Act (Perkins V) State Plan. We are thankful for the work done by the California Workforce Pathways Joint Advisory Committee (CWPJAC) and are excited to continue to participate with the California Department of Education (CDE) in the

approval of the Perkins V State Plan. CTE Programs The requirements of local educational agency (LEA) CTE Programs (pg. 53, 57) require that a career pathway must consist of not less than two full year courses, but then goes on to say that the pathway must include sufficient introductory, concentration and capstone courses. In application, this appears to mean that each pathway MUST consist of three courses, one of each in the three categories (introductory, concentration, capstone), rather than the two courses articulated in the Perkins V Plan. This can lead to problems for districts and schools when accessing funding and often results in less flexibility for developing pathways. PLTW respectfully requests the SBE and CDE to clarify the requirements of a pathway and ensure that those requirements are reflected within the California Longitudinal Pupal Achievement Data System (CALPADS). Industry Credentials Programs of Study (POS) are required to align with an industry recognized credential, while LEA CTE programs are required to “provide for certification of students who achieve industry-recognized skill and knowledge requirements” (pg. 54). The language does not clarify what “provide for certification” means; whether students must obtain an industry certification or rather obtain relevant technical knowledge and skills... . . . We agree that CTE programs should lead to employment opportunities but given that for certain industries such certification may not be appropriate or attainable, PLTW does not believe that the attainment of industry credentials should be the only way to measure the completion of a CTE program of study. PLTW suggests that CTE sequences of courses do not have to culminate in an industry credential, but that they meet the relevant technical knowledge and skills required by the industry.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 111b**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Clarification on page 57- regarding REQUIREMENTS OF SEQUENCE OF COURSES FOR CTE PROGRAMS- \*consist of Not less than Two Full year CTE courses with a combined duration of not less than 300 hours.... Adult Students drop in

and drop out of classes. For example, They may earn a certificate in Quickbooks but not necessarily stay to earn an Accounting Certificate in the Business and Finance Pathway.. Regarding Adult Schools- Clarification that this will still be validated with Participants at 20 hours and Concentrators at 40 hours, within a course would be helpful.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 112**

**Comment Source:** K–12 Instructor (CTE): Manufacturing and Product Development; Plant Manager; Small organization; CITEA. Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** 1.) Career Pathway sequence of courses should be incentivized over stand-alone or singleton elective programs. 2.) • Culminates in the attainment of a recognized postsecondary credential. ADD: or Career Certification 3.) Requirements of LEA CTE Programs: So someone who goes through a 4-year apprenticeship in a Naval Ship year and works to a senior management position over a 30-year career can get hired as a CTE teacher at the bottom of the pay-scale... This must be fixed. We must be paid according to the value we bring to CTE education. 4.) K12 CTE Requirements: Do they really teach CTE to Elementary school teacher in college? Are K-5 teachers required to integrate career into their curriculums?

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 113**

**Comment Source:** County Office Director for Educational Options/CTE/Adult Ed; Education; Child Development, and Family Services; Large organization; Association of California School Administrators. Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** i. promote continuous improvement...under the term "career pathway"...(service listed under letter) C. "Include counseling to support an individual in

achieving the individual's education and career goals;" In my experience as a CTE teacher, high school principal and now COE director counseling support at a comprehensive high school goes entirely towards the ideas that "No Child Left Behind" gifted us; all students will become a-g prepared in high school. While we are making a shift now towards college and career for all, the new draft of Perkins should use strong language to identify the counseling services are not just geared towards a 4-year college goal. The mindset of administrators, teachers and counselors alike must change to focus on an individual plan for all, modeled after a special education IEP, but on a much smaller scale. It was unethical for us as policy makers and educators to focus so strongly on college for all leaving 60-80% of students left behind (not a-g eligible) ,the adults on campus (teachers included) must have a mindset shift to prepare the workforce of the future, not just the bachelor degree achievers of the future. Every path has value, we must illuminate the pathways that lead to an ever increasing wage.

**State Recommended Action:**

While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the state level and in local implementation.

As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V

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**Comment Number: 114**

**Comment Source:** K–12 Instructor (CTE; Agriculture and Natural Resources).  
Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** It is beneficial to encourage schools to "provide opportunities for all students to participate in Career Technical Student Organizations (CTSO) clearly aligned to their specific industry sector" this will provide students with the essential leadership skills needed to develop a future work force as stated on page 65 and 66 of the California Perkins V State Plan. CTSOs are the best proven tool to teach leadership and soft skills to students. Clearly defining the criteria for an alternative leadership development program is essential to insure that all students get access to quality leadership training as mentioned on page 65 of the California Perkins V State Plan. This is something that should definitely remain in the plan. Industry involvement in CTE education is vital to insuring that the needs of industry are being met by the workforce being produced by CTE and that students have an opportunity to earn a living wage once completing a

CTE program. Increasing the number of required industry advisory committee meetings will help to connect CTE education and industry.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 115**

**Comment Source:** Non-Profit Organization; Engineering, Coding, Robotics; Small organization; Robotics Education & Competition Foundation; Nancy McIntyre, San Jose, California.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** I would like to request that schools be able to participate in “any” CTSO that provides the desired leadership skills development. There are additional programs that are providing services to meet these goals.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 116**

**Comment Source:** K–12 Administrator (CTE), Matthew Wells Mountain Desert Career Pathways, Apple Valley, CA.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** pg. 64: I suggest changing note 11 at the bottom of the page to the following: "If a district or school is unable to or elects not to provide....". Some districts are opting not to participate in CTSOs such as Skills USA due to the exorbitant costs, believing that resources can go further with high effect for more students if allocated towards alternative leadership development means. pg. 65: If the first full paragraph, I suggest adding "verbal" or "oral" communication skills to the list. In other words: "Problem-solving skills, teamwork abilities, written and verbal/oral communication skills, [...]".

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 117**

**Comment Source:** K–12 Administrator (CTE): John Buckmaster, Elk Grove Unified School District.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** There is a footnote regarding requirements of alternative leadership strategies. The list is specific, which is both helpful and troublesome. During our recent FPM review, it was noted that alternative leadership strategies must also include a portfolio, with presentation. If this strategy is no longer considered a requirement, the list is fine. If it is, the portfolio requirement really needs to be added, otherwise we may have difficulties with teachers and implementation.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 118**

**Comment Source:** Research, policy & advocacy organization; Research in higher education and the workforce; Small organization; California Competes; Gail, Oakland, CA

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Under "expand access to career and technical education for special populations," CA Competes commends Perkins V for expanding the list of special populations to focus on from Perkins IV. We recommend to also include specifically targeting traditionally underserved populations, such as racial/ethnic minority groups, student parents, immigrants, adults with SCND (25-64), incarcerated and formerly incarcerated students.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 119**

**Comment Source:** Afterschool/Expanded Learning; California AfterSchool Network; Sacramento, CA. Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Expand access to CTE for Special Populations: Local applications where applicable, shall mention community partnerships including with youth serving providers such as Expanded Learning afterschool and summer programs which support building student interest, exposure and experience in non-traditional and underrepresented career fields for students of special populations to expand the time and opportunity these students have to engage with career pathways. \* Special populations are defined below. Support the inclusion of employability skills: Applications are encouraged to show a plan to develop employability skills along a continuum from PreK to Post-

Secondary and in coordination with other partners and programs including CTSOs and other out of school time learning opportunities, such as Expanded Learning afterschool and summer learning programs, which can instill the skills early and reinforce them across time and setting.W14

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 120**

**Comment Source:** Director of Alternative Education and Child Welfare and Attendance; Education, Child Development, and Family Services; Large organization; California Association of Supervisors of Child Welfare and Attendance (CASCWA); Evelyn Ocasio, State President of CASCWA, Hayward Unified School District, and all of California for CASCW.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** PLEASE NOTE, I USED THE FORMAT [[ add: text ]] to designate recommended additional text throughout the survey Page 53 Provide appropriate, effective, and timely support services for all students, including special populations, [[ add: students enrolled in educational options schools and programs, ]] and those preparing for nontraditional occupations.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 121**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** As far as local programs, it should be based upon what industries and fields of work are in that particular part of the state. For example, the bay area has a combination of both biotech, marine and medical fields. However, it also has its fair share of food service, hospitality, recreation and tourism. Southern California also has biotech and medical, food service, hospitality, recreation and tourism and entertainment, particularly in film and television and radio broadcasting. Those are the two best examples that I could give. Each field is going to have its own set of mandates and requirements. And again, regardless of what your disability is, everyone must meet those requirements. And that there is no right or wrong way to get there and meet those requirements. Again, academic curriculums and testing will need to be developed in

order for persons with developmental and intellectual disabilities to understand. How can you expect persons with developmental and intellectual disabilities to be employable if they can't even pass the GED or high school diploma? You must include science, technology, engineering arts and math, or steam as it is known. Perhaps depending on what area of the state particular students reside in, maybe perhaps asking a particular industry to donate funds or to give funds to a particular district and programs within those school districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 122**

**Comment Source:** Postsecondary Instructor Administrator (CTE). Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Well-written and comprehensive overview of the importance of linking CTE with essential wrap-around student support and services.

**State Recommended Action:** Thank you for the comment.

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**Comment Number: 123**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Some reference to the MCSCTE from above might be served well here to underline the academic and technical skills attainment elements. There should also be coordination between K–12 and post-secondary to align the content being delivered (based upon industry input). There is a general move away from the term "soft" skills—could "employability" or "workplace readiness" or some other term denoting the importance of these skills be used instead? The organization of the "key definitions" section is confusing and cumbersome—makes it difficult to read. In a couple of places throughout this document, there is reference to a requirement for two advisory meetings per year, while in others it refers only to one required meeting per year; there should be consistency throughout. Provide some data to explain why CPAs are a reformatational

initiative leading to more positive student outcomes. The Standards for Career Ready Practice are beneficial for all California students, not only those in career pathways, and that premise should be clarified.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 124**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Within Section B(2), a, b, pp. 58—the definition of concentrator needs to be clarified, because for CALPADS, a Concentrator is the 2nd course in the sequence, but for Perkins, a Concentrator is a student who takes two courses in a sequence. This is confusing and needs to be clarified.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 125**

**Comment Source:** K–12 Instructor (CTE): Arts, Media, and Entertainment; Business and Finance; Large organization; California Business Education Association; Fred Jones, Auburn CA.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Appreciate the inclusions of at least two INDUSTRY ADVISORY COMMITTEE meetings to prove industry involvement/inclusion. These are key resources to ensure high-quality, relevant industry skills training and trajectory for CTE programs.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 126**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Refer to the Central Region Ag Education Career Pathway Trust Grant application. Fully developed to reflect this effort.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 127**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Project Lead the Way is a wonderful example of many career pathways that is working in many states in the US but not here yet. The teachers need more help in this area and the funding again needs to be their so the teacher is in a win, win course. It is very difficult to try and teach a lesson when the materials that the curriculum revolves around have not been purchased. So the class just becomes another class and the teacher has to spend their time trying to make up lessons that match the curriculum. There is no career follow through and the students fall through the cracks.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 128**

**Comment Source:** Postsecondary Instructor Administrator (CTE): Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Business and Finance; Education, Child Development, and Family Services; Energy, Environment, and Utilities; Engineering and Architecture; Fashion and Interior Design; Health Sciences and Medical Technology; Hospitality, Tourism, and Recreation; Information and Communication Technologies; Manufacturing and Product Development; Marketing Sales and Service; Public Services; Transportation; Large organization (>100 employees). Anonymous.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** On page 59, where it says "community college trustees and administrators are just as responsible for making sure they are supporting an effective and efficient

process" is not correct. College trustees and administrators are on the receiving end of what the faculty propose in curriculum. They cannot directly influence what is being taught at the community college. One cannot be responsible for something they do not control whatsoever.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 129**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 130**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.2.b.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 131**

**Comment Source:** K–12 Instructor (CTE): Arts, Media, and Entertainment; Business and Finance; Large organization; California Business Education Association; Fred Jones, Auburn, CA.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Also appreciate the strong definition and description of high-quality CTSO leadership development opportunities for students.

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 132**

**Comment Source:** K–12 Administrator (CTE): Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Engineering and Architecture; Health Science and Medical Technology; Hospitality, Tourism, and Recreation; Transportation; Tim Reid, Nevada Union High School.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Career Technical Student Organizations (CTSO) are cornerstones of leadership development in our career technical education systems— page 65 & 66. It is imperative for schools to “provide opportunities for all students to participate in Career Technical Student Organizations (CTSO) clearly aligned to their specific industry sector”. Students need to be provided with opportunities to learn these essential leadership skills needed to develop a future work force out of the classroom. CTSOs are a proven tool to teach leadership and soft skills to students.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 133**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** vi. County Offices of Education—this paragraph is written as of ALL county offices provide or facilitate PD and technical assistance. I do not believe this is an accurate statement. Not ALL county offices do this. I know because my county does not do this. Should this be rewritten more as the regional consortia or some different way?

I strongly support the inclusion of CTSOs are they are the premier high school leadership development program. However, this needs to be enforced by all State CTSO advisors. A tremendous amount of professional development and training will need to be done as many CTE teachers, especially those coming out of industry, have no idea what a CTSO is or what the expectations are of them. The alternative leadership development program needs to be clearly articulated (who, what, when, where and why)

I would add that an additional barrier teachers who will not go the extra mile unless there is some kind of financial reimbursement. Agriculture Education is the ideal model. What makes Ag Ed so good is that most of us grew up in the system and we understand the majority of ins and outs by the time we become ag teachers.

Worked-Based Learning opportunities need to be clearly defined and progressive. What age should the WBL continuum start?

Project-Based Learning needs to be clearly defined. Many people use work-based learning and project-based learning interchangeably.

**State Recommended Action: 1**

We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 134**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Need to maintain internships and mentorships. Use the Harbor Freight Model. Contact Mr. Charlie Plant (401) 741-8954 or [cplant@bigpicturelearning.org](mailto:cplant@bigpicturelearning.org).

Need to maintain viable, federally recognized CTSO's as effective methods of providing leadership options. To support this, post-secondary training and PD for teachers needs to be present.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation. As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 135**

**Comment Source:** Postsecondary Instructor Administrator (CTE). Anonymous.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Although not necessarily required to be included in the State CTE Plan, it might be beneficial to provide some more guidance and a framework for how LEAs and CCDs can better integrate planning and services with their local Workforce Development Boards and America's Job Center.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 136**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Each eligible agency, should not only describe, which programs are available out there for the populations that which they serve, but also describe the ways in that which each agency could help their respected eligible populations. Describe how they can assist in each program of study.

In terms of simulated work environments, in the last question, or two questions ago, I talked about community colleges that which provided culinary arts and hospitality management programs. At the community college that I went to, the culinary arts and hospitality management division of our department of fine and applied arts, has two student run businesses on site. We have the OK Café, that which is a student run café, that is open for lunch. Wow there is an instructional aid, usually two of them, that would help the students, the students run everything. Their line cooks and prep cooks as well as those that wash, sanitize and dry dishes, utensils and cookware. There is also a student run bakeshop. All of the baked goods that are made, are made in the baking classes, including the production baking class held from 5:30 to 7:30 Monday through Friday morning. Those are examples right There, of simulated work environments. Those work environments, that while simulated given provide students the training that they need when they go out for jobs out in the actual community. Our community college also has a career center. Each agency must collaborate, not only with each other, but with elementary, junior high and high schools, but also with community colleges, adult schools, that which provides these kind of programs and even, as I just mentioned adult schools, like the Charles a Jones business, education, employment and skills training center in my own backyard of Sacramento California. both adult schools and community colleges have career centers. And that all three agencies must collaborate with those career centers on those campuses. Even collaborate with the employment development department in order to collect data from each industry to find out, which industries are in demand and are actually looking to hire. Some industries hire from within, some higher from with out. Those that who hire from within, chances are, it might be a good idea to start with paid internships first. Have students/clients brought on as interns first. Also industries that do not require prior experience first, make sure that they say what they mean. Even if they say what they mean, make sure that the client/student knows what here she is getting into and support them in preparing him or herself first. For example, even though I have an introductory baking and pastry

certificate from my community colleges culinary arts and hospitality management program, I am willing to get more training, if the employer mandates and requires it.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 137**

**Comment Source:** K–12 Administrator (Non-CTE): Linked Learning Alliance, Rachel Zaentz, VP of Communications, Linked Learning Alliance, San Francisco, CA.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** (Recommendation 1) Section B: Program Administration and Implementation vii. improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V) vii. improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V) On page 84 of its draft plan the State indicates the following, “Moreover, given that the special population categories are the same as those under ESSA, performance gaps for special population students enrolled in CTE can be potentially compared to those special population students not enrolled in CTE for K–12 programming.” The groups identified as special populations in Perkins V and ESSA are not aligned. ESSA and Perkins both emphasize traditionally underserved students, but the two laws define these populations differently. ESSA, for example in section 1111(b)(2)(B)(xi), includes racial and ethnic subgroups, while Perkins V omits these sub-populations. We believe however, it is important for the State to treat racial and ethnic subgroups as special populations under Perkins V to target programming and implementation efforts that will improve outcomes and reduce gaps for all historically underserved student groups in the State. Additionally, because of the way the State has proposed to define its concentrator definition—more prescribed than Perkins V requires—, the State will not have comparable comparison groups. (See detailed recommendation in Section D: Accountability for Results, regarding the State’s concentrator definition). The consistency in the definitions would allow for a braiding of federal funding to meet the needs of all CTE students and ensure the districts develop a comprehensive approach to ensure student success. The prescribed state definition does not allow for flexibility of CTE course taking and take in account the transiency of many underserved students. It also does not accurately display the success of CTE

students who go through a two course sequence but are not considered a completer. Agree, that it is important the data is comparable for comparison groups.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 138**

**Comment Source:** Representing Students: Michael Funk, Director, Expanded Learning Division California Department of Education

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** In the section describing Implementing Career and Technical Education Programs and Programs of Study, page 74 states that California will ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations. It is important to note that Expanded Learning programs are federally required to serve student populations with a high percentage of students who qualify for Free or Reduced Price Meals (FRPM). Schools with Expanded Learning programs average over 75 percent student eligibility for FRPM. So partnerships between Expanded Learning programs and Perkins V funded programs will be beneficial in helping to achieve equal access for disadvantaged students to these CTE programs.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 139**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** page 65- (Regarding Adult Schools). Student Leadership Organization activities are difficult for Adult students to participate. We must be mindful not to place more barriers on the most vulnerable students. Adult students are already struggling with childcare, transportation and unemployment.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 140**

**Comment Source:** K–12 Administrator (CTE): ROCP CAROCP, Melissa Dix CRY-ROP.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** i. page 66 CTE TEACH clarification here: CTE Teach is a model for CTE Teacher induction that works with multiple credentialing LEAs throughout the state as well as provides resources for all districts in the state that need to develop their own mentoring programs for new CTE Teachers and provide ongoing CTE Teacher PD.

**State Recommended Action: 1**

We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 141**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** I think that when the teachers are involved in the planning of the CTE Pathways and the equipment purchased then there is going to be buy in. The students are only frustrated when they get a lesson and half of it has to be changed due to lack of materials. Why are there so few computer courses in the high schools? Businesses are begging for employees and even bringing employees from other countries to fill jobs, but our schools are so stuck in this college mode that the students do not even get a computer course in their 4 years of high school.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 142**

**Comment Source:** Educational Services Provider, (both direct and systems); Education, Child Development, and Family Services; Large organization; California Afterschool Network; Bill Fennessy Think Together, Statewide.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Expanded Learning Programs (EXLPs) are extremely well positioned to provide Work-Based Learning programming, activities and supports, as they have both the time and resources to provide different modalities of learning in direct support the

current instruction of the Instructional Day. This is one of EXLPs important goals, and a goal they were intended and designed to fill. Additionally, EXLPs are intended to be student-driven and centered around student services. They give students a voice at all levels, provide advocacy for counseling access, and support all transitions. EXLPs value more than just academic skills and the support for essential and technical skills is both provided and encouraged. In the context of student-centered services, EXLPs can help address current barriers and actions needed for CTE programs. These included addressing barriers to WBL, such as scheduling, transportation, and on-site supervision; dual enrollment barriers in operations, support for multiple entry and exit points, and the promotion or marketing needed to show CTE as a viable path to parents, business and industry. Additionally, EXLPs have an incumbent responsibility and opportunity to engage their entire community, especially business and industry partners. Therefore, EXLPs are well positioned to also provide the crucial intermediary support needed to help address the historic disconnect or divide between schools and both businesses and industries where work-based learning opportunities have been concerned, (as identified in Section b, Subsection vi).

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 143**

**Comment Source:** K–12 Administrator (CTE), Matthew Wells, Mountain Desert Career Pathways, Apple Valley, CA.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** pg. 84: Typo: "Under California state law, every LEA must adopt and annually update a three-year LCAP and update it annually"—remove "and update it annually". Already stated.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 144**

**Comment Source:** Afterschool/Expanded Learning; California AfterSchool Network; Sacramento, CA. Anonymous.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Describe how the eligible agency will make information available (c, i): The eligible agency will partner at the state level with community groups that serve youth and their parents, such as statewide PTOs and Statewide Afterschool Networks, to

communicate opportunities in career exposure, enrollment, work-based learning, and other resources available to students, including opportunities extending beyond the school day during afterschool and over the summer. Facilitate collaboration among eligible recipients in the development and coordination of CTE programs and programs of study and career pathways that include multiple entry and exit points (c,ii): The eligible agency will encourage local plans to discuss how they have considered leveraging local community and business resources that expand where, when and how students have access to career exposure and career pathway experiences, including opportunities before school, after school and or over the summer. Ensure equal access to approved CTE program of study and activities for special populations (c,iv): The agency will support supplemental learning environments and experiences that support the engagement of special populations such as targeted summer experiences, gender specific programming and near-peer and similar demographic mentors during and after the school day. Support effective, meaningful collaboration to provide students with experience in and understanding of all aspects of an industry which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities (c, vi): Collaboration will be supported by ensuring the local needs assessment engagement process include relevant stakeholders including local employers, Expanded Learning afterschool and summer programs, and other community based and youth serving organizations, as well as parents and students. Improve outcomes and reduce performance gaps for CTE concentrators including those who are members of special populations (c, vii): The agency will support research-based interventions which may include access to Expanded Learning afterschool and summer programs which provide additional time and engaging experiences as a means to provide extra resources to close gaps in performance.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 145**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Providing a reference to dual enrollment (as the system is implemented in California), such as the Career Ladders Project website, would be helpful to provide context.

It would be instructive to provide more information in this section about cross-segment work in K–12 SWP/SWP through the CWPJAC, such as data elements/metrics, etc.

Increased sources/availability and use of micro-regional labor market information (sub-county level) would be more helpful in determining needs and addressing gaps in programs across K–12 and post-secondary segments.

Work-based learning as part of the "student-centered" approach also provides context and relevance for learning, when properly integrated and delivered as part of both core academic and CTE subject matter content. CTE is particularly effective at this contextualization, which also assists English learners and students with disabilities in their understanding.

Transportation and choice issues are noted in the "yellow" part of the response, but not clearly within the "blue" sections—these are critical items to be addressed for many students, particularly those in low socio-economic areas. As noted later in the section, transportation and regional programs allow transferability of program coursework and skills to other areas, which is beneficial for students and the employer community at large. Greater efforts to make coursework portable statewide (e.g., through the Statewide Career Pathways Project) would also assist with this. It would be extremely helpful to include components about labor market information and employer needs/workplace readiness as part of teacher, counselor, and administrator preparation programs (both core and CTE) to increase familiarity with the concepts, not only for special populations, but also for all students. In addition to the reference to Guided Pathways for community colleges, the Linked Learning framework advises all students be afforded access to the full range of work-based learning continuum experiences, and should be included in section B.2.c.vi. The section on the Dashboard seems to be circular/repetitive.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local

implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 146**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 147**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.2.c.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 148**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** I provided West-ed the documentation I had regarding Title V in the stakeholder meetings. Community College will only articulate CTE classes. An example is Anatomy and Physiology (in the Perkins course sequence for Vocational Nursing). Community College considers the class academic and will be articulate. Same with Psychology for the healthcare worker- a pre-requisite for VN program, but Community College will not articulate deeming the class "academic". Concurrent Enrollment for adult school is difficult, most teachers don't have a masters in their subject area. Again, serving the disadvantaged adult, these are barriers that keep students from compressing and accelerating. Community College Academic Senate can easily prohibit the advancement in any collaboration towards accelerating and compressing curriculum. Therefore, articulation is limited for the adult student.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 149**

**Comment Source:** Postsecondary Instructor Counselor or Career Staff. Anonymous.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** Broader opportunities for Adult students in k-14 Districts must be established to accelerate training/educational via co-enrollment opportunities/articulation agreement with community colleges.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 150**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** It seems this is where most of the money is being spent along with the higher level AP classes. Half of the students put in these classes are not even prepared to succeed in them.

**State Recommended Action:** 4

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**Comment Number: 151**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 152**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** Dual enrollment options are not viable options in every institution, however work-based learning can support these goals. We also need to bring back work experience options.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 153**

**Comment Source:** Postsecondary Instructor (CTE): CATA. Anonymous.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** "California has committed considerable resources, as it continues to endorse and encourage eligible recipients in developing opportunities for secondary school students to participate in dual or concurrent enrollment programs..." I would agree that dual enrollment should be considered, however I do not believe currently programs should be rewarded or penalized in regards to dual enrollment. Even though Dual enrollment is currently being offered at community colleges state wide, each college has different criteria in the implementation-until dual enrollment can be similare state wide it should not be utilized as a performance indicator.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 154**

**Comment Source:** Dual Enrollment and Outreach Coordinator at College; WACAC; Elizabeth Loudon, Lake Tahoe Community College.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** I am not sure what it looks like to have “multiple entry and exit points.”

Clarity about the changes in dual enrollment policies is absolutely needed. I hope there will be multiple meaningful PD options available.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 155a**

**Comment Source:** (2) K–12 Administrators (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** Course to Course Articulation Agreements need to be counted as part of CCI. They are college classes. I support COLLEGE AND CAREER not College or Career. Every student deserves a full, inclusive, comprehensive education. In some parts of the proposed State Plan it is almost as if articulation and dual enrollment are being used interchangeably. However, only one counts on the CCI.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 155b**

**Comment Source:** K–12 Administrators (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** As both dual/concurrent enrollment and articulation are specifically addressed in this section, it is curious that LEAs are being informed that the CCI will not include articulated classes. Used properly, the system of articulation (through credit-by-exam) provides outstanding opportunities for students to gain college credit while still in high school, and thus should be included in the indicator. This is one area of potential conflict between dual enrollment and articulation, as referenced in this section.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 156**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** It is my experience, that each agency, particularly the department of education, and the department of rehabilitation, as it is currently called should provide the opportunity for students to take early high school college competency courses. Again, students will need supports to study and to understand what it is that they are reading, not just in the areas of reading comprehension, but also in the areas of math comprehension, in order for them to be able to answer questions and get them right. If a particular school does not offer early college competency courses, perhaps another school in the same district can provide them that opportunity.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 157**

**Comment Source:** K–12 Administrator (CTE), Matthew Wells Mountain Desert Career Pathways, Apple Valley, CA.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** Pg 85: Just wanted to acknowledge appreciation for the nod to building connections between CTE and LCFF/LCAP. The lack of explicit need to address CTE in LCAP sometimes leaves CTE inclusion a bit diluted. Pg. 87: Similarly, appreciate the celebration of articulation and dual enrollment expansion. In future years when good data is collected through CalPads, I suggest including baseline and growth numbers.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 158**

**Comment Source:** Community-based organization; Sue Sawyer, Redding, CA.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** We are encouraged by the array of opportunities listed. We need assurance that readiness of college level course work is not a reason to deny access for students with disabilities.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 159**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.2.d.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 160**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** Advisory committees are important; however, they should be more regional and accepted by the state. Our partners can only be spread so thin. Our local community college competes for the same industry partners as we do especially in relation to advisory committees, job shadows, internships and apprenticeships. Personnel dedicated to building and maintaining LEA and industry relationships is highly needed. My district has two people dedicated to this purpose; however, they are both grant funded (CTEIG, K12SWP). If these grants lose funding, my staff lose their jobs. Holding advisory committee meetings three times per year is adequate especially if your members participate in other advisory committees and the related activities of both committees. How do you hold educators accountable to business? There are 80 CTE teachers in my district. It is an unreasonable expectation to hold each individual teacher accountable to business. Will there be funding to increase the salaries of teachers or to provide stipends?

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 161a**

**Comment Source:** Postsecondary Instructor Administrators (CTE), (1) Postsecondary Instructor (CTE): CATA. Anonymous.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** While I am strong supporter in the need to link CTE programs with business and industry contacts, I am concerned that the new recommendation to hold quarterly versus annual advisory meetings would create an increased burden on these partners. For community colleges with many CTE programs, scheduling quarterly advisory

meetings could present a challenge. Perhaps a workable alternative would be to require a minimum of one (1) annual business/industry partner advisory meeting. Semiannual CTE program advisory committee meetings could be the recommended standard. This would afford additional opportunities to discuss curriculum updates and additions.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 161b**

**Comment Source:** Postsecondary Instructor Administrator (CTE). Anonymous.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** It was mentioned that stakeholders recommended that the state change the requirement from one per year to four per year (quarterly) for local advisory committee meetings. For many colleges/programs, this would be rather challenging to change from one to four. If a change were to be implemented, it seems as if changing the requirement to meeting twice per year would be more reasonable.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 161c**

**Comment Source:** Postsecondary Instructor (CTE): CATA. Anonymous.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** All CTE programs do need support of an active advisory meeting. However, I disagree with the suggestion of moving them to quarterly-many industry partners are asked to serve a multiple advisory committees, furthermore their time is a valuable commodity. I would suggest that advisory be planned out in accordance to local needs and the K-14 programs work with their local advisory board to have gainful well planned meetings, in which all stakeholders are able to attend.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 161d**

**Comment Source:** Postsecondary Instructor Counselor or Career Staff, Eric Anthony San Diego

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** Page 93 states “Teachers in particular suggested increasing the number of required local CTE program advisory meetings to quarterly”. Quarterly meetings between colleges and business and industry is unachievable. Regionally, many private sector representatives attend advisory committees for multiple colleges and struggle to attend once or twice per year per college. Increasing the number of required meetings to four would make this impossible to accomplish.

**State Recommended Action:**

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**Comment Number: 162**

**Comment Source:** Postsecondary Instructor Administrator (CTE): Education, Child Development, and Family Services; Large organization (>100 employees).

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** Page 95: The suggested change from requiring CTE Programs to meet with industry advisors once per year to quarterly is out of alignment with employer and faculty capacity. While requiring just one meeting per year does not seem like enough, requiring four per year is far too many. Employers will not be interested in attending four meetings per year. Additionally, faculty do not have the capacity to coordinate four meetings per year. Requiring two meetings per year is fantastic as this will ensure the advisory committees meet once per semester. Any more than this as the base line requirement is not taking into consideration the realities of employers times and faculty workload.

Page 97: incorporating the CLNA into the application makes sense—I hope for year one, this means general broad narrative questions about how the institutions completed the needs assessment and incorporated it into decision making as well as a question at the program/top code level. I'm assuming needs assessment process questions will also be part of the four year plan? Regarding the comment about a template in the future, I believe institutions are seeking guidance, but are also currently taking steps to complete the needs assessment—this is because they cannot wait until the spring to get all the work done before the application due date -unless due dates are changed. Page101—it is sounding like the local applicants will need to reply to self assessments based on the guiding principles and elements of high quality pathways—I think this is a great idea.

But will it occur at the program level or the institution level? What timeframe will be allowed for completion of this self-assessment? how will evidence of the completion of the self-assessment be requested?

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 163**

**Comment Source:** K–12 Instructor (CTE): Manufacturing and Product Development; Plant Manager; Small organization; CITEA. Anonymous.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** Must define a Requirement for local LEA CTE Advisory Committees. They should meet twice a year.. just like CTE Teachers are required to do!

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 164**

**Comment Source:** Community-based organization; Sue Sawyer, Redding, CA.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** We recommend adding representatives from special education be required members of the advisory system.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 165**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** I can't stress this enough. It's definitely all about collaboration.! All three agencies are going to have to collaborate with each other, as well as with elementary, junior high, high school's and community colleges along with adult schools and even universities. You're also going to have to collaborate with career and technical education teachers along with those in labor, including organized labor small Business

owners, and yes even with tribal governments. It's all about collaboration. Just like it takes a village to raise a child, it's going to take a village to support a person with a disability, not just during their childhood years but in their adult years.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 166**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** The accountability system, particularly the CCI, should also be such that LEAs (along with parents and other community stakeholders) understand the benefit of CTE and career readiness.

Incentives (e.g., tax breaks) should be provided for businesses to participate in a meaningful, sustained fashion in work-based learning opportunities for students and externships for teachers to keep them updated on current and future industry trends, while not over-burdening their time and efforts.

Alignment of data systems/metrics and application processes across Perkins and other state grant initiatives such CTEIG and SWP would be a welcome change.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 167**

**Comment Source:** K–12 Instructor (CTE): Arts, Media, and Entertainment; Business and Finance; Large organization; California Business Education Association; Fred Jones, Auburn, CA.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** Appreciate the inclusions of INDUSTRY ADVISORY COMMITTEE to prove industry involvement/inclusion. These are key resources to ensure high-quality, relevant industry skills training and trajectory for CTE programs.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 168**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** Woodland Senior High School's Ag Education program could be a great model. We have accomplished this exactly. Using boosters, advisory committees, industry partners, the local tribe (Yoche De He) to plan and develop our local educational options. Contact Mr. Eric Dyer 530-681-0251, eric.dyer@wjusd.org

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 169**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** People need more guidance to support how to do this.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 170**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** This is a good question. The groups that are included are usually not there. I am a teacher and when I went to a conference...the only teachers were the ones that pushed themselves to get the approval. It should be mandatory attendance for the teachers and not a district call. Parents need to be invited so the input of all is there. I think that businesses are there if they invited but this takes some knowledge of the district leadership to implement. I think this would be a great growth step for students in leadership.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 171**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 172**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.2.e.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 173**

**Comment Source:** Postsecondary Instructor Administrator (CTE). Anonymous.

**Perkins V Application Prompt Number: B.2.f.**

**Comment:** Page 95, 98 & 99: Regarding a common CLNA template—The CLNA “template” should not focus on a product and standards but rather on the process of conducting a thorough needs assessment. The outcomes and product will vary by CC and LEA depending on the various programs, student outcomes, and local economic needs. A template product and standards will inhibit innovation by prescribing the format of CLNA outcomes. Rather having guidance on what should be considered during CLNA processes (similar to the work produced by ACTE) would be more productive to producing stronger systemic outcomes.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 174**

**Comment Source:** K–12 Administrator (CTE): Mary Whited; Merced County Office of Education.

**Perkins V Application Prompt Number: B.2.f.**

**Comment:** Pg. 95: Response to f: it would be great to be able to use a regional CLNA that was already developed (possibly using CC Regional Plans) that LEAs could then localize and plan around. This could eliminate the possibility of the issue of equity and fairness to those who do not receive enough Perkins dollars to validate the expense of a total CLNA. Local Perkins dollars should not be used to hire a grant writer or other personnel to satisfy this requirement.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 175**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: B.2.f.**

**Comment:** Timelines need to be aligned to LCAP meetings as well.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 176**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: B.2.f.**

**Comment:** Agreed—the state needs one application for all state and federal programs.

**State Recommended Action:**

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**Comment Number: 177**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.2.f.**

**Comment:** Applications need to include the total plan with the teacher's input for equipment and materials with timelines. Consumables should also be included in the plan.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 178**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.2.f.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 179**

**Comment Source:** Postsecondary Instructor Counselor or Career Staff, Eric Anthony, San Diego, CA.

**Perkins V Application Prompt Number: B.2.f.**

**Comment:** Quarterly

**State Recommended Action:**

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**Comment Number: 180**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.2.f.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 181**

**Comment Source:** Postsecondary Instructor Administrator (CTE). Anonymous.

**Perkins V Application Prompt Number: B.2.g.**

**Comment:** Regarding a common CLNA template—The CLNA “template” should not focus on a product and standards but rather on the process of conducting a thorough needs assessment. The outcomes and product will vary by CC and LEA depending on the various programs, student outcomes, and local economic needs. A template product and standards will inhibit innovation by prescribing the format of CLNA outcomes. Rather having guidance on what should be considered during CLNA processes (similar to the work produced by ACTE) would be more productive to producing stronger systemic outcomes.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 182**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.2.g.**

**Comment:** Our local plan LCAP needs to include teachers input and where they can give their input on funding and what is needed to make the programs work.

**State Recommended Action:**

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**Comment Number: 183**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.2.g.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 184**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** This needs to be a transparent plan that is posted on all district schools and the district sites. The funding should be transparent and part of the total plan.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 185**

**Comment Source:** K–12 Administrator (CTE): Mary Whited; Merced County Office of Education.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** Pg. 101: Response to h: Could there be some kind of waiver so that Court and Community Schools could qualify for Perkins? Comments on page 18 of this plan call out the need to serve the juvenile justice population that contains high percentages of the special populations, yet because of their size, these students and programs are often left out of this funding. This is an access and equity issue.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 186**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** Some schools and institutions claim huge appropriations and leave others with meager amounts. With the 85%-10%-5% and the balance 50% at secondary and post-secondary, keep this formula. A per student formula needs to be present with enhances established programs over new programs. I would support “full implementation of funds after 5 years of effective instruction, based on “the eleven elements of a high quality CTE program” assessment and only 50% funding for programs 0-4 years with the districts/ LEA's responsible to support the start-up programs with the remaining 50%. This will establish an “incentive program” versus an entitlement allotment.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 187**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 188**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** The state's response is general in nature. The field will want more details. Does the Cal State and UC systems need to be involved in the plan? CTE continues to fight the “college for all” misconception, yet it is the UC that pretty much drives the K–12 education system.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 189**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture. Anonymous.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** Class sizes should be smaller for better practices and learning experience. A class size of 10 students

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 190**

**Comment Source:** Director of Alternative Education and Child Welfare and Attendance; Education, Child Development, and Family Services; Large organization; California Association of Supervisors of Child Welfare and Attendance (CASCWA); Evelyn Ocasio, State President of CASCWA, Hayward Unified School District, and all of California for CASCWA.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** PLEASE NOTE, I USED THE FORMAT [[ add: text ]] to designate recommended additional text throughout the survey.

Page 102 Scope for California is defined using the CWPJAC’s Guiding Policy Principles that help to define state expectations for high-quality college and career pathway programs in California. Taking a student-centered focus, promoting equity and access, achieving system alignment, and supporting continuous improvement all impact the scope and quality of California’s CTE programs. Curricula content should align to state standards as laid out within the CTEMCS. Additionally, students should be able to access a continuum of learning that allows them to progress in an industry pathway at the secondary level, pursue a career field of their choice at the postsecondary level, and then have the opportunity to avail themselves of off and on ramps. Furthermore, all student groups, including special populations, must have equitable access to high quality CTE programs. [[ add: Delivery of services using a student-centered approach for all K–14+ college and career pathways incorporates the identification, addressing and removal of individual, institutional or systemic barriers that impede the progress of students in achieving their education and career goals. ]]

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 191**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** Here again, micro-regional (sub-county/suburban) economies should be considered in the nature of CTE program offerings within an area, and data resources

should be more readily available to support needs assessment and program maintenance/improvement.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 192**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.2.h.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 193**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** How a person is provided with equal access under this act, depends upon their disability. For example, if a person is blind, depending on what level of vision they have, they will need materials in braille, or in large print. Cursive will not work. It will need to be in print only. For those with little, or no eyesight, braille is best. For someone who is deaf, interpreters Will need to be provided. And for those that who are deaf and blind, if a person who is deaf and blind is taught to read braille, then they know how to read braille. Also, that there are interpreters that who can finger spell everything into their hand, if the blind/deaf person can read fingerspelling. If a person cannot walk, and Hass to be in a wheelchair, wheelchair access is definitely important. If If A persons arms and or legs don't work at all, accommodations will need to be provided for them. This may involve the use of special joysticks and other devices, including ropes and handles and gears. Nobody, regardless of what kind of disability they have she'll never be discriminated.! People that only have developmental/intellectual disabilities might feel uncomfortable around people that are just blind. But that's part of life. We are all one people. Everyone must be given the same opportunities and have the same rights to develop, to the best of their ability further learning for high demand, high skill and highway jobs. And do it by any means necessary and legal under the law. we already have only a handful of programs that are doing this, but not enough. We must move away from sheltered and segregated settings. In order to achieve all of these goals,

each person must be provided appropriate accommodations just based on their disability, or disabilities, should they have more than one so as to allow them and give them the right to work in the integrated and competitive setting.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 194**

**Comment Source:** California Committee on Employment of People with Disabilities, Maria Aliferis-Gjerde Sacramento, CA.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** An overview of Special Education Local Plan Areas (SELPA) and Disabled Student Programs and Services (DSPS) are included, beginning on page 105. Additional language is needed on how SELPA and DSPS can collaborate with CTE programs to address both system alignment and the student-centered delivery of services. Partnerships with the DOR and the DDS are referenced on page 107. The current language is overly-broad and does not describe how CTE programs will interact with DOR and DDS. The State of California has adopted the Competitive Integrated Employment (CIE) Blueprint and created Local Partnership Agreements (LPA) among DOR, DDS, and the Department of Education. CIE is referenced briefly, but we believe additional language should be included that describes these efforts in more detail, and how CTE programs can coordinate with these LPAs. Although the State Plan for CTE mentioned DOR, more discussion is needed on how DOR’s existing programs can collaborate with CTE and DOR’s Students Services. These two strategies will help promote system alignment with DOR and DDS. Accommodations, including the need for support services such as “adaptive equipment and services,” for students with disabilities are mentioned on page 110. Language should be added that CTE programs can use existing processes such as the individual education plans and 504 plans for students with disabilities to secure adaptive equipment and service needs. Strategies can be developed through independent living centers for the use of devices from the Assistive Technology Device Lending Library. Stakeholder concerns on the lack of understanding of disabilities, including employer concerns, begin on page 112. Existing entities, such as DOR, DDS, DSPS and independent living centers, have an expertise in working with businesses, understanding disabilities, and disability benefits planning.

Strategies should include developing partnerships in those areas. The language for preparing teachers, beginning on page 114, provides a basic overview of needs for all CTE teachers, but special populations are only referenced briefly and without specific strategies. Cultural competency curriculum for professional development should include content on disabilities, implicit bias and trauma-informed practices. Partnerships can be developed with existing entities to provide content for CTE teachers.

**State Recommended Action: 1**

While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 195**

**Comment Source:** Self-advocates and family advocates of individuals with developmental disabilities, Cindy Smith, Sacramento.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** One of the barriers for individuals with disabilities in attaining or retaining CIE is having to work with multiple state agencies and providers to get access to services and supports. California has undertaken multiple initiatives to reduce these barriers. For example, to operationalize the Employment First Policy, the Departments of Education (CDE), Department of Developmental Services (DDS) and Department of Rehabilitation (DOR) have adopted the Competitive Integrated Employment Blueprint. Local Partnership Agreements (LPA) have been created to streamline services and supports needed for CIE between Regional Centers, DOR Districts and local education agencies (LEAs). The Perkins V Plan recognizes this agreement as an important step for students working towards CIE through CTE programs. • **Recommendation:** The Council believes that the Perkins V Plan should more fully describe how CTE programs will coordinate services and supports with DOR and DDS (p. 107) and with the LPAs. In addition, the Plan recognizes that Special Education Local Planning Areas (SELPA) and Disabled Student Programs and Services (DSPS) play an important role in ensuring equitable access to CTE programs, but the Council believes additional language is also needed on how SELPAs and DSPS can collaborate with CTE programs to align services and supports and ensure services are student-centered (p. 106). The Plan should also recognize that the Independent Living Centers play an important role in providing services and supports to individuals with disabilities who are not eligible for services from the Regional Centers.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 196**

**Comment Source:** Community-based organization; Sue Sawyer, Redding, CA.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** This language is generic to all members of special populations. We recommend that the descriptors for recruitment, access, and engagement for each member of the special populations should be defined in the local plan.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 197**

**Comment Source:** Representing CA Community College Teacher Preparation Programs; Education, Child Development, and Family Services; Renee Marshall, Santa Clarita, 661-755-4125, Education@Renee-Marshall.com.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** Page 111 of the Perkins V state Plan stated that “Stakeholders also noted the importance of diversifying the teacher workforce to more closely match student populations...” This is a primary objective of the CA Community College Teacher Preparation Programs (CCCTPP). CCCTPP would like CA’s education systems to work more closely together on teacher preparation efforts. CCCTPP currently has 25 (of the 115) community colleges involved in Communities of Practice, focusing their efforts on teacher preparation and diversifying CA’s teacher workforce. The CCCTPP colleges have the program infrastructure and student population California needs to diversify the teacher workforce. Almost 70% of California’s teachers attend a community college at some point on their education pathway. CA Community College Teacher Preparation Programs play an essential role in the development of California’s teacher workforce.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 198**

**Comment Source:** Afterschool/Expanded Learning; California AfterSchool Network; Sacramento, CA. Anonymous.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** iii: Programs will expand student exposure through, where applicable, engaging in community partnerships that leverage time, spaces, volunteers, and experiences to help students of special populations learn in ways that are engaging and effective at building and sustaining interest in their chosen pathways, which can include Expanded Learning afterschool and summer programs designed to increase exposure and confidence in non-tradition and underrepresented fields

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 199**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** Employer concerns about workers' compensation and liability in implementing WBL experiences are coupled with competing time and resource limitations; incentives (tax and otherwise) could encourage sustained, scaled participation in these efforts (B.3.a.v).

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 200**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** Students need to be included in this plan so they have buy into their own education. The pathways need to be posted on each school's website to allow the students to choose.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 201**

**Comment Source:** Community-based organization; Workforce Development Board. Anonymous.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** CTE and WIOA Title I need to be aligned. There are many businesses that WIOA Title I works with that say that CTE does not meet their current needs. Both CTE and WIOA Title I should work together to avoid duplication of services and to ensure businesses are getting the trained workforce that is needed. There also needs to be clarity in defining priority industry sectors for CTE and WIOA. The two should both align and need to work better together.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 202**

**Comment Source:** K–12 Administrator (CTE): Large organization ; Pam Knapp, San Joaquin County Office of Education.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** My concern on this section is the total amount of funding earmarked to execute these much needed goals.

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 203**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 204**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** All students need full access to all provisions of the Perkins and Federal Law. To overtly bias one over another regardless of past practice in highly inappropriate but from this time forward, it shall be required.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 205**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.3.a.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 206**

**Comment Source:** (2) K–12 Instructors (CTE) and (1) K–12 Instructor (Non-CTE):

- K–12 Instructor (CTE): Engineering and Architecture; Large organization; California Teachers Association; Debra Krikourian, Folsom Cordova USD.
- K–12 Instructor (Non-CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Efrain Mercado, Sacramento, CA.
- K–12 Instructor (CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Kristin Montoya, Fullerton, CA.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** CTE programs need well qualified CTE instructors; yet, CTE teachers are disappearing from the workforce. California schools are still dealing with the 20% drop in the number of career technical high school teachers which occurred between 2011-

12 and 2012-13. The problem continues to grow while the solutions do not grow more innovative. The pipeline to recruit these instructors varies with the industry sector. The Association asserts the plans for teacher recruitment is incomplete and doubts the success for the strategies suggested. The responses to the prompts are not aligned to our current reality. For example, existing state law defines any person who is employed to teach at a CCD for not more than 67 percent of the hours per week be considered to be a part-time, temporary employee. (EC § 87482.5). Nursing instructors must meet a unique set of qualifications from other community college faculty. Many clinical nursing instructors continue to serve as practicing licensed nurses while teaching, leading to a larger number of part-time nursing faculty. Due to the long hours required in the clinical component and clinical rotations, part-time faculty can quickly exceed the 67 percent cap. An exemption to this cap is necessary to ensure the continuity of education for students and to meet the requirements of clinical sites. In 2006, an exemption to the 67 percent cap for part time faculty was established for clinical nursing faculty SB 1309, (Scott, Chapter 837, Statutes of 2006), the law was renewed in 2014 (SB 860, Budget Committee). The law sunset on December 31, 2015... .. The exemption allowed part-time clinical nursing faculty to be employed full-time on a temporary basis for up to four consecutive semesters at one district. According to the CCCCO during the four year period that this exemption was in place, 21 colleges hired a total of 155 adjunct nursing faculty and were able to serve an additional 351 students each year. Colleges also reported that this exemption allowed them to be more competitive with the private sector in hiring and retaining faculty. The plan applies an “one size fits all” approach of teacher recruitment at a macro level and across industry sectors without considering the variance of recruitment needs and likely outcomes as illustrated by the example about nursing programs. Beyond recruitment, the plan does not fully consider a very important retention policy. For example, the Association asserts there is a need to give CTE teachers the right to earn permanent status. Most CTE teachers are considered “ROP.” Under ED Code, ROP teachers are not considered permanent teachers with due process rights. Similar to all the ideas proposed in this section, changing the employment status of CTE instructors will require legislation. Current law prohibits teachers at regional occupational centers or programs (ROC/Ps) from being classified as a permanent employee of a school district, regardless of the amount of time they work. Existing law distinguishes school districts with an average daily attendance of less than 250 students by utilizing different criteria when determining an employee's classification status, which has prevented many employees from receiving permanent status. For county office of education, only certificated employees in teaching positions may be eligible for permanent status, leaving other certificated employees without the

ability to receive proper classification.” Specific edit: Page 115, paragraph 3: “In addition, the state must review out of date statutory limitations on permanent status based on ADA.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 207a**

**Comment Source:** K–12 Administrator (CTE): Large organization ; Pam Knapp, San Joaquin County Office of Education.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** All information provided in this section is crucial and valuable, not to mention imperative to the future of CTE. Inclusion of some type of incentive or stipend needs to be provided to assist with the costs of earning a CTE credential for those coming from an industry background that will show value in the recruitment process of non -CTE credentialed teachers.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 207b**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** Currently, CTE teachers are very difficult to find. There is no incentive to advantage industry professionals to the classrooms. Industry professionals are often required to forfeit their Social Security benefits. Most have over 40 quarters invested. Please protect them. Post secondary institutions, maybe community colleges, need to

provide a four-year degree option for CTE instructors. Ag is solid but the other areas are non-existent. Make a CTE teacher specific induction program. Recognize the California Ag Teachers Association efforts to establish an Ag Teacher specific induction program. Actually teach CTSO's for CTE Teachers

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 208**

**Comment Source:** K–12 Instructor (Non-CTE): Arts, Media, and Entertainment; Large organization; California Teachers Association; Oakland, CA. Anonymous.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** CTE programs need well qualified CTE instructors; yet, CTE teachers are disappearing from the workforce. California schools are still dealing with the 20% drop in the number of career technical high school teachers which occurred between 2011-12 and 2012-13. The problem continues to grow while the solutions do not grow more innovative.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 209**

**Comment Source:** K–12 Instructor (CTE): Manufacturing and Product Development; Plant Manager; Small organization; CITEA. Anonymous.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** 1.) Grow Your Own: Thanks a lot! 2.) CTE Workgroups Discussions: Teacher Prep-Suggest the Bachelors of Vocational Education be re-established (Sac State 1998) Could be set up as a summer or on-line program. Retain Teachers-Equitable pay is required to attract qualified CTE Teachers. 3.) Recruiting CTE Teachers: Survey the needs NOW and develop recruiting taskforces to replace retiring teachers.

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 210**

**Comment Source:** Postsecondary Instructor (CTE): CATA. Anonymous.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** I agree with the recommendation-however be sure to include continued support within the first 5 years of teaching and possible develop a CTE evaluation/assistance program outside of the normal employer provided.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 211**

**Comment Source:** California Committee on Employment of People with Disabilities, Maria Aliferis-Gjerde Sacramento, CA.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** The language for preparing teachers, beginning on page 114, provides a basic overview of needs for all CTE teachers, but special populations are only referenced briefly and without specific strategies. Cultural competency curriculum for professional development should include content on disabilities, implicit bias and trauma-informed practices. Partnerships can be developed with existing entities to provide content for CTE teachers.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 212**

**Comment Source:** K–12 Administrator (CTE): ROCP CAROCP, Melissa Dix CRY-ROP.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** There is no mention of CTE Teach in this section! CTE Teach has been the model for CTE Teacher induction/preparation for the state for the past 11 years and has served more than 160 educational organizations and over 3500 teachers. It also partners with 8+ CTE credential programs to provide curriculum for CTE teacher Early Orientation (a CTC credentialing requirement).

<https://www.cteonline.org/cms/page/cteteach> In partnership with the California Department of Education, CTE TEACH supports the unique needs of new Career Technical Education (CTE) teachers transitioning from industry into the classroom as well as veteran CTE teachers. CTE TEACH provides training and professional development using three strategies: -An on-line early orientation program -An online professional development program -A two year teacher induction program THE FOUR CORNERSTONES OF CTE TEACH -Increase teacher retention -Improve teacher training -Enhance teacher effectiveness -Advance student learning

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 213**

Representing CA Community College Teacher Preparation Programs; Education, Child Development, and Family Services; Renee Marshall, Santa Clarita, 661-755-4125, Education@Renee-Marshall.com.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** CA Community College Teacher Preparation Programs (CCCTPP) are involved in statewide and regional Communities of Practice, focusing their efforts on teacher preparation and diversifying the teacher workforce. There are 25 colleges formally involved in this effort, with the infrastructure to scale teacher preparation efforts across the community college system. The CCCTPP statewide Community of Practice has a primary objective to help bridge teacher preparation efforts across education systems. The majority of CCTPP campuses are currently operating at a fraction of capacity due to CCCTPP's primary funding sunset in October 2019. At a time when there is a critical teacher shortage across the state impacting many disciplines of the field of education, California Community College Teacher Preparation Programs are in a

prime position to scale efforts of teacher preparation, including professional development opportunities and an emphasis on recruiting and training CTE teachers, across education systems. If given the resources to do so, CCCTPP colleges have the program infrastructure and student population California needs to diversify the teacher workforce. Almost 70% of California's teachers attend a community college at some point on their education pathway. CA Community College Teacher Preparation Programs play a critical role in the development of California's teacher workforce and the movement to improve instruction for special populations. CCCTPP pledges to scale the "Grow Your Own" model of teacher recruitment and to work together, across education systems, to come up with solutions. Please consider including and supporting CA Community College Teacher Preparation Programs within Perkins V.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 214**

**Comment Source:** Postsecondary Instructor (CTE): Education, Child Development, and Family Services. Anonymous.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** Institutions can provide full teacher education for early care and education and elementary education offering certificates, local and transfer degrees. Pipelines beginning in high school can be effective in appropriately preparing pre-service teacher with pedagogy and experience with children. Liberal Arts should not be allowed for teachers of children under age 12 years and education/pedagogy can be included for Middle school through High School pre-service teachers. Internships could also be provided for all pre-service teachers through the community college that would help ensure that students are well suited to the field. Creating media resource centers/labs for students would also allow access to resources and materials that many students would not otherwise have access to. Many students have themselves come from a background where they did not have access to simple play materials. We can not expect adults without these experiences themselves to be able to appropriately teach children and use age appropriate materials with them. Lab techs or student workers for these labs would also provide additional supports while allowing faculty to focus primarily on teaching and developing partnerships in the community.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this

comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 215**

**Comment Source:** Non-Profit Curriculum & Professional Development Provider; Project Lead the Way, Elly Garner San Diego, CA.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** On behalf of Project Lead The Way (PLTW), we appreciate the opportunity to comment on the draft California Strengthening Career and Technical Education for the 21st Century Act (Perkins V) State Plan. We are thankful for the work done by the California Workforce Pathways Joint Advisory Committee (CWPJAC) and are excited to continue to participate with the California Department of Education (CDE) in the approval of the Perkins V State Plan. CTE Programs CTE courses must be taught by a teacher who meets the CTE teacher credential and occupational experience (pg. 52). “The lack of CTE credentialed teachers in the state of California has been a growing concern” (pg. 117). While the plan acknowledges the challenge and points to working groups at the California Commission on Teacher Credentialing (CTC) (pg. 114, 117), it is vital that the CTC and CDE prioritize modifying/updating the requirements to obtaining a CTE credential and create flexibility within credentialing pathways. Without more credentialed CTE teachers, the Perkins V plan will have limited impact.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 216**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** Military spouses/dependents who are trained as teachers in other jurisdictions are another under-utilized resource; making the out-of-state credentialing processes more user-friendly for them could also assist with these efforts (particularly for non-DOD on-base schools). Here again, providing incentives for employers to offer teacher externships could be a step forward in gaining more opportunities for educators. An additional issue with dual enrollment for CTE courses is that a teacher may be required to meet not only the secondary credentialing requirements, but also the community college minimum qualifications, which severely limits the pool of instructors, and thus of the sections offered to students to gain college credits while in high school.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 217**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** The plan for using the funds needs to include funding for each teacher to get the training that is appropriate to their needs and not for a district teacher on special assignment that teaches a general course for all. Teacher know what they need and have the education to help them further their skills. I am thinking that a shared assignment with a special ed teacher and a CTE teacher in the same class might be a plan that would help special populations be more successful.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 218**

**Comment Source:** Postsecondary Instructor Counselor or Career Staff. Anonymous.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** Our agency (LAUSD-Division of Adult and Career Education) will accomplish these goals by:

- Having a dedicated and specialized staff (CTE Teacher Navigator/Recruiter).
- Expanding high-quality and industry specific professional development opportunities for CTE staff.
- Strengthening professional learning communities and developing an on-line hub for CTE staff training resources.

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 219**

**Comment Source:** Community-based organization; Sue Sawyer, Redding, CA.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** We recommend that training topics include understanding disabilities. 90% of students with disabilities have average to above average intellectual abilities. It is critical they have the opportunity to learn.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 220**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** Rather than segregate and shelter all special education students in a room with special education teachers, all homeroom teachers, given my experience must have training in special education. In addition there should be specialized instructional support professionals and parent professionals. Also, principles must be trained in special education as well. In addition, All classrooms must be small and not have very many students. Not large classrooms. The smaller the classroom size, the more attention the teacher is able to give to each and every student. Still, it makes absolute sense to have Specialized instructional support personnel. As I said a few pages back, school counselors and school psychologists must have training and experience dealing

with persons with disabilities, including developmental and intellectual disabilities, not only in providing behavioral assessments, but also academic assessments. Also parent professionals are critical.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 221**

**Comment Source:** Self-advocates and family advocates of individuals with developmental disabilities, Cindy Smith, Sacramento.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** Both Title II of Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act apply to CTE programs because they are operated by local government and/or receive federal financial assistance. The ADA provides that public entities, such as local and state government must not exclude individuals with qualified disabilities from participation in or be denied the benefits of services, programs and activities (42 U.S.C. 12131). Public entities are required to make reasonable modifications to policies, practices and procedures. For individuals with disabilities, this includes not only equitable access to the CTE program but also likely accommodations to benefit from the CTE program. CTE teachers and other professionals need to be provided appropriate training on working with individuals with disabilities to ensure equitable access and accommodations. • Recommendation: Given these requirements, the Council believes that the Perkins V Plan should more fully describe how the State will ensure the provision of accommodations for individuals with disabilities in CTE programs. The Council also recommends that the Plan identify additional strategies that would prepare CTE teachers and other professionals to work with individuals with disabilities. For example, CTE teachers and other professionals should be provided professional development opportunities and technical assistance that include training on providing accommodations, universal design for learning and teaching diverse learners (p. 76 and p.114). Lastly, the Council believes the Plan should describe what action the State will take with CTE programs should they discover discriminatory practices during the State's monitoring of CTE programs.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 222**

**Comment Source:** Director of Alternative Education and Child Welfare and Attendance; Education, Child Development, and Family Services; Large organization; California Association of Supervisors of Child Welfare and Attendance (CASCWA); Evelyn Ocasio, State President of CASCWA, Hayward Unified School District, and all of California for CASCWA.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** PLEASE NOTE, I USED THE FORMAT [[ add: text ]] to designate recommended additional text throughout the survey.

Page 116 CTE focused PD can be valuable for non-CTE faculty, counselors, administrators, and other staff as well. While K–12 non-CTE teachers may have single-subject or multiple subject credentials, they often lack extensive experience in the workplace outside of education. Preparation programs do not emphasize knowledge of workplace needs, career development issues, or CTE-academic integration, as described above. Greater exposure to the needs of the workplace could also enhance administrators' ability to provide vision and leadership in CTE. [[ add: It is also important to encourage the inclusion of educational options school and program educators and administrators in CTE professional development and planning activities. ]]

**State Recommended Action:** We appreciate the commenter's input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 223**

**Comment Source:** K–12 Administrator (CTE), Matthew Wells Mountain Desert Career Pathways, Apple Valley, CA.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** Pg 118, last full paragraph: "LDI" is referenced but not defined. I suggest defining it and spelling out the acronym (especially since I'm an LDI-alum and huge advocate).

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 224**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture. Anonymous.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** More instructional administrators job need to be created with CTE background.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 225**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** How is this possible for districts in declining enrollment that are losing teachers?

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 226**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: B.4.a.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 227**

**Comment Source:** Director of Alternative Education and Child Welfare and Attendance; Education, Child Development, and Family Services; Large organization; California Association of Supervisors of Child Welfare and Attendance (CASCWA); Evelyn Ocasio, State President of CASCWA, Hayward Unified School District, and all of California for CASCWA.

**Perkins V Application Prompt Number: C.1.**

**Comment:** PLEASE NOTE, I USED THE FORMAT [[ add: text ]] to designate recommended additional text throughout the survey.

Page 116 CTE focused PD can be valuable for non-CTE faculty, counselors, administrators, and other staff as well. While K–12 non-CTE teachers may have single-subject or multiple subject credentials, they often lack extensive experience in the workplace outside of education. Preparation programs do not emphasize knowledge of workplace needs, career development issues, or CTE-academic integration, as described above. Greater exposure to the needs of the workplace could also enhance administrators' ability to provide vision and leadership in CTE. [[ add: It is also important to encourage the inclusion of educational options school and program educators and administrators in CTE professional development and planning activities. ]]

**State Recommended Action:1**

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**Comment Number: 228**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: C.1.**

**Comment:** PLEASE NOTE, I USED THE FORMAT [[ add: text ]] to designate recommended additional text throughout the survey.

Page 116 CTE focused PD can be valuable for non-CTE faculty, counselors, administrators, and other staff as well. While K–12 non-CTE teachers may have single-subject or multiple subject credentials, they often lack extensive experience in the workplace outside of education. Preparation programs do not emphasize knowledge of workplace needs, career development issues, or CTE-academic integration, as described above. Greater exposure to the needs of the workplace could also enhance administrators' ability to provide vision and leadership in CTE. [[ add: It is also important to encourage the inclusion of educational options school and program educators and administrators in CTE professional development and planning activities. ]]

The wording here is missing the most important element. You can write achievement and I agree this is important—to make it work—you need to add the equipment and materials. Distribution of funding needs to be more in the teacher's planning with the district so the correct materials for the course will be ordered. If there is a plan that includes the funding then it needs to specify what is needed and how it will be used. There is so much waste due to district science person (that has no knowledge of the CTE Pathway) ordering materials that are not needed and not ordering what is really needed.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 229**

**Comment Source:** K–12 Instructors (CTE): Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD (1); and other respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: C.1.**

**Comment:** For years the emphasis has been put on districts, schools, educators, staff, to make sure our students in California become college ready. However the shift to make sure all students have the chance to make an impact and have a successful career is here. One of the Governor's many platforms is a 'cradle-to-career' student. By providing hands-on skills training, no matter what the career path is, it allows students to have the opportunity to be career ready when they get to that spot in their life. By selecting option (C) in the Accountability for Results section on page 130 of the CA Perkins V State Plan, this would allow students to have access to these work based learning opportunities for years to come. It would also insure that California's growing population would continue to have an educated/skilled work force and will not only benefit this great state but also future generations to come.

Need to support and recognize “industry Certifications” for students. Need to support articulations from secondary to post-secondary institutions.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 230**

**Comment Source:** Postsecondary Instructor Administrator (CTE): Denise Brooks, Long Beach CA.

**Perkins V Application Prompt Number: C.1.**

**Comment:** Roll CTE Transitions into the full Perkins IC as one allocation so that the colleges only have one report for the funds. This would then be a local decision to call out the transitions activities.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation. As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 231**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: C.1.**

**Comment:** What does the WBL continuum look like? Need examples of activities by grades or by some other method. What data supports the line "significant progress with developing education and industry partnerships?" What is the tool that will provide "real time labor data?" Is this a valid number? I listened to a Georgia Data Analyst during the ACTE Vision Conference and he said the be very careful using real time labor data.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 232**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.1.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 233**

**Comment Source:** Postsecondary Instructor Administrator (CTE): Denise Brooks, Long Beach CA

**Perkins V Application Prompt Number: C.1.**

**Comment:** I would like to formally request that the "3 year rule" with not being able to fund the same project more than three years before.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 234**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: C.1.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 235**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: C.2.a.**

**Comment:** I think here that the word skills ...is a very general word ....what skills :: Teacher input is important. What are the funds going to be spent on....salary, equipment, consumables?

**State Recommended Action:**

While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 236**

**Comment Source:** K–12 Instructor (CTE; Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: C.2.a.**

**Comment:** Need to maintain 85-10-5 levels with 50% going to secondary and 50% to post-secondary/adult. Need to maintain career assessments and skill certifications. Funding should be tied to program completion of articulated programs.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan., 5

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**Comment Number: 237**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.2.a.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 238**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: C.2.a.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 239**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County.

**Perkins V Application Prompt Number: C.2.b.**

This needs to be specific and have the teacher giving input into what materials are needed to make the course a success and therefore provides students with the skills needed to succeed.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 240**

**Comment Source:** K–12 Instructor (CTE; Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: C.2.b.**

**Comment:** Current funding is effective however, approximately 1/3 goes to LAUSD. All LEA's must demonstrate maintenance or growth on the CTE dashboard. New programs should only be funded at 50% a with the balance required by the LEA's involved. This will incentivize effective implementation. Long term, CTE support should be matched by the LEA's.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 241**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.2.b.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 242**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: C.2.b.**

**Comment:** The minimum grant award amount is \$15,000 (says \$15,00).

**State Recommended Action:** We appreciate the commenter’s input and have made corresponding changes to draft Perkins V application consistent with statutory requirements.

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**Comment Number: 243**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: C.2.b.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 244**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: C.2.b.**

**Comment:** This needs to include not just how the allocations are distributed but what programs they are going to and what equipment and materials will be purchased to make the class successful for students.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 245**

**Comment Source:** K–12 Instructor (CTE; Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: C.2.b.**

**Comment:** Eligible LEA's must establish their CTE funding mechanism within their LCAP, identifying specific CTE funding to be used as direct match for PERkins funds.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 246**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.2.b.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 247**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation

**Perkins V Application Prompt Number: C.2.b.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 248**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: C.4.**

**Comment:** Again, this is not enough to make the programs work. The district allocates funds but if the teacher teaching the class does not get what they need then the class should not be taught. The plan.....Teacher, district and CTE Coordinator work together....then plan the class.... teacher inputs what is needed the funding is given and class is a success. Students learn.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 249**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.4.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 250**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: C.4.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 251**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.5.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 252**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: C.5.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 253**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.6.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 254**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: C.6.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 255**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.7.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 256**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: C.7.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 257a**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; FFA, California Agriculture Teachers Association (CATA); Noah Grossman, Calaveras High School.

**Perkins V Application Prompt Number: C.8.**

**Comment:** As a teacher of CTE classes, one of which is dual enrolled. I do not believe that dual enrollment is a good indicator, as only a small minority will take advantage of the dual enrollment options through college. Instead work-based learning opportunities

are the criteria that would really show whether a program and its students were flourishing, and becoming connected with real opportunities in their local workforce. This is currently the focus of our school district and our CTE program, to get more work-based learning opportunities in place. As dual enrollment is not a priority for students or staff.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 257b**

**Comment Source:** K–12 Administrator (CTE): Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Engineering and Architecture; Health Science and Medical Technology; Hospitality, Tourism, and Recreation; Transportation; Tim Reid, Nevada Union High School.

**Perkins V Application Prompt Number: C.8.**

**Comment:** In terms of concerns, I really only have one. Accountability for Results—The committee has chosen option (b) as California’s accountability measure. Option (b) measures the percentage of students completing dual enrollment classes.—page 131. The preferable option would be option (c) the percentage of students participated in work-based learning.—page 130. Providing hands on skills training in a real world environment is the best way to insure that students have the needed skills and experiences to be successful in the workforce and earn a living wage. Selecting option (c) would insure that students have access to those work based learning opportunities.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 258**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; CATA. Anonymous.

**Perkins V Application Prompt Number: C.8.**

**Comment:** Providing hands on skills training in a real world environment is the best way to insure that students have the needed skills and experiences to be successful in the workforce and earn a living wage. Selecting option (c) in the Accountability for Results section on page 130 of the California Perkins V State Plan would insure that students have access to those work based learning opportunities.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 259**

**Comment Source:** K–12 Instructor (CTE; Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: C.8.**

**Comment:** CTE Programs must be assessed using “the eleven essential elements of a High Quality CTE program”. Failure will reduce funding. Districts/ LEA's not supporting CTE with at least a 50%-50% match as identified in their LCAP will not be funded.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 260**

**Comment Source:** California Committee on Employment of People with Disabilities, Maria Aliferis-Gjerde Sacramento, CA.

**Perkins V Application Prompt Number: C.8.**

**Comment:** There is no reference to special populations or students with disabilities in the accountability for results section, beginning on page 130. The State Plan for CTE did not reference data for students with disabilities. CCEPD proposes that the percentage of students with disabilities participating in CTE programs should be in parity with the percentage of all people with disabilities in their local areas as a goal for the State of California. This would serve as a goal to increasing the number of students with disabilities participating in CTE programs.

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 261**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: C.8.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 262**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: C.8.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 263a**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; California Agriculture Teachers Association; Tom Vazquez, West Valley High School, Cottonwood CA.

**Perkins V Application Prompt Number: D.1.**

**Comment:** Program quality should be measured by the CTE students that have graduated having participated in work based learning. Work based learning not only exposes students to what the work industry has to offer them, but more importantly show them the relevance of the academic courses they are taking. It gives them application for math and English language arts. I believe that work place learning is a strong indicator of a quality CTE program.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 263b**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; CATA (1). Anonymous.

**Perkins V Application Prompt Number: D.1.**

**Comment:** Providing hands on skills training in a real world environment is the best way to insure that students have the needed skills and experiences to be successful in the workforce and earn a living wage. Selecting option (c) in the Accountability for Results

section on page 130 of the California Perkins V State Plan would insure that students have access to those work based learning opportunities.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 263c**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: D.1.**

**Comment:** Not all community colleges are willing or able to “play ball” when it comes to developing and implementing dual enrollment courses. Work-based learning is about career ready, sorely missing in the CCI. Worked-based learning (hands-on learning) is much more indicative of the real world rather than completion of a dual enrollment course. High schools are much more able to provide WBL opportunities the they are dual enrollment courses; thus making WBL accessible to all students. Additionally, most students who will do well in dual classes are already “good” students and can handle the additional seat time. High schools in my district offer dual classes after school thus adding to the length of the school day for students. I believe students, especially special populations, do not have equal access to dual courses. C should be the priority option here

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 264a**

**Comment Source:** K–12 Instructor (Non-CTE):

Education, Child Development, and Family Services; Large organization; California Teachers Association; Efrain Mercado, Sacramento, CA..

**Perkins V Application Prompt Number: D.1.**

**Comment:** LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state’s school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 264b**

**Comment Source:** K–12 Instructor (Non-CTE): Arts, Media, and Entertainment; Large organization ; California Teachers Association, Oakland, CA. Anonymous.

**Perkins V Application Prompt Number: D.1.**

**Comment:** LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state’s school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically disagrees with the proposed SDPL as printed on page 149. In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly completed the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance. The Association does not believe that it is the state’s intent to create a policy that would expect lower performance in CTE programs as compared to traditional academic programs but the performance standards as outlined in the plan would accomplish just that. Specific edits: p. 149. The baseline can be set based on the data developed about CTE concentrators as a student group; however, the long term goal

must be the same as the goal for all student subgroups as adopted by the SBE. • Four-Year Graduation Rate: The four-year graduation rate is based on who should be counted in the numerator and denominator. While the CDE staff recommend that the SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCAPExtended Graduation Rate: The state's long-term goal for the extended graduation rate is 90.5%. CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE to address ESSA accountability. • Academic Proficiency in Reading Language Arts: Statewide, California students are 3 points below the standard in English language arts. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long-term performance goals in English language arts for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state's long-term goal. • Academic Proficiency in Mathematics: Statewide, California students are 33.5 points below the standard in Mathematics. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long term performance goals in English language arts for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state's long-term goal.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 265**

**Comment Source:** K–12 Instructor (CTE): Arts, Media, and Entertainment; Business and Finance; Large organization; California Business Education Association; Fred Jones, Auburn, CA.

**Perkins V Application Prompt Number: D.1.**

**Comment:** I disagree with the current draft's recommendation to use (b)—college credit/dual enrollment, as the primary accountability indicator. This is another bias toward college as the primary filter of success, which would also bias against rural districts, at-risk students, and underserved populations—all of whom are hampered in their access to such dual enrollment coursework for a number of various reasons (proximity to college campus; presence of high-achieving instructors who reach beyond their campus to form relationships with college faculty/administrators; stuck in remediation coursework that minimizes opportunities to enroll in a sequence of CTE courses that could end in a capstone, college-credit course, etc.). Therefore we suggest the State should prioritize (c)—work-based learning.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 266**

**Comment Source:** K–12 Instructor (CTE): Agriculture and Natural Resources; Small organization; California Agriculture Teachers Association, North Coast Growers Association.. Anonymous.

**Perkins V Application Prompt Number: D.1.**

**Comment:** I am an agriculture teacher in Northern California and I am concerned about the amount of dual enrolled students being a large factor is this iteration of the Perkins State Plan. Each individual high school has to work with their junior colleges to create dual enrollment opportunities for their students. This takes a lot of time between the teachers and administration at both the high school level and junior college level. Small high schools, who cannot afford to pay someone full time to work on dual enrollment are at a significant disadvantage. Also, college staff have the entire say between my specific high school and our junior college as to whether or not a class qualifies for dual enrollment. This puts way too much power in the hands of the colleges and high schools

are out of luck if they cannot make dual enrollment work. I do not think this is a good indicator of a quality CTE program; there are way too many factors at play that are out of the hands of the high school.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 267**

**Comment Source:** Former high school and community college student; Rick Hodgkins, Citrus Heights, CA.

**Perkins V Application Prompt Number: D.1.**

**Comment:** Outcomes and quality results, should not depend on how well students are doing, but rather on how well the staff are supporting them. This goes for administrators all the way down to specialized instructional aids.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 268**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: D.1.**

**Comment:** I think they all need to be included as the district can take the student in dual enrollment and only use that data as a quality indicator.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level

(SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 269**

**Comment Source:** California Committee on Employment of People with Disabilities, Maria Aliferis-Gjerde Sacramento, CA.

**Perkins V Application Prompt Number: D.1.**

**Comment:** There is no reference to special populations or students with disabilities in the accountability for results section, beginning on page 130. The State Plan for CTE did not reference data for students with disabilities. CCEPD proposes that the percentage of students with disabilities participating in CTE programs should be in parity with the percentage of all people with disabilities in their local areas as a goal for the State of California. This would serve as a goal to increasing the number of students with disabilities participating in CTE programs. Duplicate

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 270**

**Comment Source:** K–12 Administrator (CTE): John Buckmaster, Elk Grove Unified School District.

**Perkins V Application Prompt Number: D.1.**

**Comment:** I am somewhat concerned about inclusion of college credits as a SDPL due to multiple issues obtaining articulation agreements and reporting through CALPADS. This puts secondary institutions at the mercy of postsecondary institutions and instructors. There are cases in which the community college administration is very much in favor of articulations while the faculty refuses to move. Dual/concurrent enrollments come with a host of challenges, including min. qualifications; as noted elsewhere in the report, recruitment/retention of CTE teachers is difficult and a high-need area. Asking for one more qualifier makes that much more difficult. While I agree that things like work-based learning may be harder to track (and qualify, for that matter), they are in more direct control of teachers and administrators and relationships built with industry partners. If this indicator were somehow tied to postsecondary reporting/accountability,

that would be a different matter. As long as it is more important to the secondary than postsecondary institution, accountability is skewed.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 271**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Perkins V Application Prompt Number: D.1.**

**Comment:** The CCI should be designated as the “College \*and\* Career Readiness Indicator” to emphasize the need for students to be prepared for college, career and life. The “college credit courses” indicator should explicitly call out dual/concurrent enrollment and articulation opportunities for students, and provide mechanisms for both types of courses to be accurately reported in the CalPADS system.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 272**

**Comment Source:** Director of Alternative Education and Child Welfare and Attendance; Education, Child Development, and Family Services; Large organization; California Association of Supervisors of Child Welfare and Attendance (CASCWA); Evelyn Ocasio, State President of CASCWA, Hayward Unified School District, and all of California for CASCWA.

**Perkins V Application Prompt Number: D.1.**

**Comment:** YOUR SURVEY DID NOT PROVIDE A BOX FOR INPUT RE PAGE 131. IT SKIPPED TO “Please use the space below to provide feedback on the State's response to Prompt D.1. (pages 133-135):” Page 131 California is fortunate to have an already developed CCI with sound definitions, established collection procedures, and an easy-

to-understand reporting mechanism. The CCI is one of the state indicators on the California Dashboard and is an additional state indicator of student success for high schools. The SBE is working to adopt performance standards (i.e., five-by-five grid) for the CCI. In addition, the CCI is designed to include multiple measures in order to value the multiple pathways that students may take to prepare for postsecondary learning. [[ add: Student Engagement (attendance rates, chronic absenteeism rates, dropout rates, graduation rates) and School Climate (suspension and expulsion rates) are other California School Dashboard priorities and data indicators that reflect CTE workforce readiness skill development. ]] More to the point, the CCI becomes a potential source from which California can choose, determine, and establish the Perkins V secondary quality indicator.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 273**

**Comment Source:** Research, policy & advocacy organization; Research in higher education and the workforce; Small organization; California Competes; Gail, Oakland, CA.

**Perkins V Application Prompt Number: D.1.**

**Comment:** We need data and clearly we’re suffering from an inability to measure. CA Competes recommends including more specifics of how the postsecondary sector is going to go about collecting data on the effectiveness of these CTE program.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 274**

**Comment Source:** K–12 Administrator (CTE): Hatha Parrish; CVUSD/Los Angeles.

**Perkins V Application Prompt Number: D.1.**

**Comment:** We have been implementing a method to track student WBL for the past few years; I would like to understand more about the methodology that will be used to report this OR be part of the committee that determines this.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 275**

**Comment Source:** Postsecondary Instructor Administrator (CTE): Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Business and Finance; Education, Child Development, and Family Services; Energy, Environment, and Utilities; Engineering and Architecture; Fashion and Interior Design; Health Sciences and Medical Technology; Hospitality, Tourism, and Recreation; Information and Communication Technologies; Manufacturing and Product Development; Marketing Sales and Service; Public Services; Transportation; Large organization (>100 employees). Anonymous.

**Perkins V Application Prompt Number: D.1.**

**Comment:** Your web form missed page 131. I would suggest to make the CCC's mission binding on specific TOP codes at each college. If a department representing a TOP code is not making any progress towards those goals, continuing to finance their activities does not seem like a good investment. Obsolete programs not making any progress should no longer be funded.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 276**

**Comment Source:** Respondent did not provide any professional or identifying information.

**Perkins V Application Prompt Number: D.1.**

**Comment:** Definition of concentrators does not align with CALPADS definition of concentrator—this is confusing.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 277**

**Comment Source:** K–12 Administrator (CTE): CTE; Small organization; CAROCP. Anonymous.

**Perkins V Application Prompt Number: D.1.**

**Comment:** If (a) and (b) are to be truly instituted and high schools are to be held accountable, the Community Colleges need to do their part. The State needs to work with the Chancellor's Office to hold the Community Colleges accountable for supporting the high schools with post-secondary credentials or dual enrollment, etc. In some regions of the state, there is a disconnect between the high schools and the community college, including a lack of access to a variety and competitive programs in all sectors found in other regions. Thus, high schools lacking this type of support would struggle meeting (a) and (b). And local Community Colleges should allow and support easier routes for high schools to establish agreements to support (b) with other Community Colleges.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 278**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: D.1.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 279**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: D.1.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 280**

**Comment Source:** K–12 Administrator (CTE): Hatha Parrish; CVUSD/Los Angeles.

**Perkins V Application Prompt Number: D.2.**

**Comment:** On the CAASP results website, you are able to drill down to see the ELA and Math proficiency data for a range of student groups. CTE isn't one of them. There needs to be a central/publicly available way to track this data. And/or can you let me know where I can find this data? AND, as far as I am familiar with the dashboard, the current 5x5 grids don't disaggregate CTE completers as a subgroup, so it's very hard for me to understand where our students would fall in the table on pages 151-152.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 281**

**Comment Source:** K–12 Administrator (CTE): CTE; Small organization; CAROCP. Anonymous.

**Perkins V Application Prompt Number: D.2.**

**Comment:** Not all LEAs have the same resources, industry partnerships, and supportive Community Colleges to create an even playing field in meeting the performance indicators. In other words, a lack of equity across the State, combined with common performance measures for all will result in LEAs not being able to meet performance.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 282**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: D.2.**

**Comment:** What are the levels of performance for the CTE Pathways and how are they determined? Are teachers included in this input?

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 283**

**Comment Source:** K–12 Administrator (Non-CTE): Linked Learning Alliance, Rachel Zaentz, VP of Communications, Linked Learning Alliance, San Francisco, CA.

**Perkins V Application Prompt Number: D.2.**

**Comment:** (Recommendation 2) Section D: Accountability for Results Provide the eligible agency’s measurement definition with a numerator and a denominator for each of the quality indicator(s) the eligible agency selects to use. Page 135-142 California has chosen to align its concentrator definition at the secondary school level with one of the existing College/Career Indicator (CCI) measures within the state’s overall accountability system. The State’s new concentrator definition however will preclude many students from being included in the State’s Perkins V accountability system.

Perkins V was written to require accountability in two primary manners: First, it requires accountability for students the law defines as “concentrators” which at the secondary level is defined as: “a student served by an eligible recipient who has completed at least 2 courses in a single career and technical education program or program of study” [Section 3(12)]. The U.S. Department of Education Office of Career, Technical, and Adult Education further explains the concentrator definition on page 23 of its Guide for the Submission of State Plans by stating, “This means that once a student completes 2 courses in a single CTE program or program of study, they are counted as a CTE concentrator.” Second, the law requires accountability only in the aggregate—at the ‘all student’ level, negating state determined performance levels for student subgroups. Given these requirements within the Perkins V federal accountability system, if California moves forward with its proposed concentrator definition, the State will not achieve its desired goal of having similarly comparable groups—comparing the performance of students in CTE programs versus students not enrolled in CTE programs—as expressed on page 84... Duplicate ... Moreover, the State will be limiting its improvement efforts by omitting students who fall outside of the State’s concentrator definition: “A CTE student who completes at least 300 hours of course sequence in an industry pathway, and the sequence includes the capstone course; and the CTE student receives a grade of C- or better in the capstone course.” Finally, the State’s definition will not be aligned with the Perkins V statutory definition. The State would be able to achieve its vision of equity and access for all students as endorsed in the “Guiding Policy Principles to Support Student-Centered K-14+ pathways” by adopting a CTE accountability system that includes more students, and one that more closely aligns accountability with efforts as required under ESSA. Additional Comments: Even though the CCI is set with a grade of C- or better, this does not support the importance of student achievement in subgroups and reinforces the perception of a low standard for CTE students. The students in a capstone course should have a higher level of knowledge and have taken the prerequisite CTE courses that would give them the foundational knowledge to succeed. Note in districts, such as Antelope Valley Unified High School District, the CCI is not reflective of the CTE pathway success due to the academic indicators in which our student performance level is low. If the system was more aligned with ESSA it would allow districts like AVUHSD to work toward serving the whole student, using multiple resources across many divisions.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level

(SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 284**

**Comment Source:** K–12 Instructor (CTE; Agriculture and Natural Resources; Transportation; CATA, CITEA Woodland Ag Boosters; Eric Dyer Woodland Senior High, Woodland JUSD.

**Perkins V Application Prompt Number: D.2.**

**Comment:** Need to include CTE industry recognized certifications

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 285**

**Comment Source:** K–12 Instructor (Non-CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Efrain Mercado, Sacramento, CA.

**Perkins V Application Prompt Number: D.2.**

**Comment:** LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state’s school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically disagrees with the proposed SDPL as printed on page 149. In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly completed the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance. The Association does not believe that it is the state’s intent to create a policy that would expect lower performance in CTE programs as compared to traditional

academic programs but the performance standards as outlined in the plan would accomplish just that. Specific edits: p. 149. The baseline can be set based on the data developed about CTE concentrators as a student group; however, the long term goal must be the same as the goal for all student subgroups as adopted by the SBE.

- Four-Year Graduation Rate: The four-year graduation rate is based on who should be counted in the numerator and denominator. While the CDE staff recommend that the SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCAP...
- Extended Graduation Rate: The state's long-term goal for the extended graduation rate is 90.5%. CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE to address ESSA accountability.
- Academic Proficiency in Reading Language Arts: Statewide, California students are 3 points below the standard in English language arts. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long-term performance goals in English language arts for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state's long-term goal.
- Academic Proficiency in Mathematics: Statewide, California students are 33.5 points below the standard in Mathematics. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long term performance goals in English language arts for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state's long-term goal.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 286**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: D.2.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 287**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: D.2.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 288**

**Comment Source:** K–12 Administrator (CTE): Hatha Parrish; CVUSD/Los Angeles.

**Perkins V Application Prompt Number: D.3.a.**

**Comment:** Since there is currently nothing in the table for WBL... We have been implementing a method to track student WBL for the past few years; I would like to understand more about the methodology that will be used to report this OR be part of the committee that determines this. Duplicate

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 289**

**Comment Source:** K–12 Administrator (Non-CTE): Linked Learning Alliance, Rachel Zaentz, VP of Communications, Linked Learning Alliance, San Francisco, CA.

**Perkins V Application Prompt Number: D.3.a.**

**Comment:** (Recommendation 3) Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—b. an explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8. (Page 135-136) California’s state determined performance levels (SDPLs), as currently proposed, do not adequately meet the statutory requirements of Perkins V to ensure adequate and ongoing improvement for CTE students. Specifically, the SDPLs jeopardize the State’s ability to “continually make meaningful progress toward improving the performance of all career and technical education students...”, including historically underserved subgroups and special populations, as required under the law [Section 113(b)(3)(A)(i)(III)(bb)]. First, California’s SDPLs do not demonstrate improvement year over year—which precludes continual progress. For example, the SDPLs for secondary schools for the following indicators show no improvement between fiscal year 2020 and fiscal year 2021: the four year-graduation rate, proficiency in reading language arts, proficiency in mathematics, and post-program placement. The non-traditional program concentration indicator demonstrates no improvement year over year until the third program year. Although the State’s draft Perkins V plan attempts to align Perkins V indicators with other federal programs, including ESSA, the State appears to fall short. One specific example is the four-year graduation rate. Under California’s draft Perkins plan, the four-year graduation rate target is 88.5% by fiscal year 2022, while under ESSA the target is 89.0%. Additionally, the State’s ESSA indicators show year over year improvement while Perkins indicators do not... . Second, the State may be depressing its targets by maintaining the same performance target over two years (as described above) in an effort to comply with the following provision in Perkins V that allows the state to adjust its performance levels after two years: “Prior to the third program year covered by the State plan, each eligible agency may revise the State determined levels of performance for any of the core indicators of performance for the subsequent program years covered by the State plan...” [Section 113(b)(3)(A)(ii)]. The state may adjust its performance levels after two years, but they must be “higher than the average actual performance of the 2 most recently completed program years...” [Section 113(b)(3)(A)(i)(III)(ee)]. Given the State’s most robust improvement currently set for its SDPLs occurs after the second program year, the State may choose to adjust

its performance levels down considerably which might further stifle continual meaningful progress for CTE students. We recommend the State set its SDPLs for all indicators in a manner that demonstrates annual improvement for all CTE students to better align with the State’s approach under ESSA—and that the improvement is quantifiably meaningful. The challenge for setting the term is that the indicator for CTE pathway success in the completion of a course sequence vs. a test score. Agree, that there should be a consistency but factors contributing to CTE pathway success is not a hard number or a benchmark.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 290**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: D.3.a.**

**Comment:** Informants is a poor choice of words.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 291**

**Comment Source:** K–12 Administrator (CTE): CTE; Small organization; CAROCP. Anonymous.

**Perkins V Application Prompt Number: D.3.a.**

**Comment:** No mention of the type of stakeholder to be involved in this “special group.” The specific stakeholders that should be involved should include principals, and CTE/Perkins Coordinators.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 292**

**Comment Source:** K–12 Instructor (Non-CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Efrain Mercado, Sacramento, CA.

**Perkins V Application Prompt Number: D.3.a.**

**Comment:** LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state’s school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically disagrees with the proposed SDPL as printed on page 149. In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly completed the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance. The Association does not believe that it is the state’s intent to create a policy that would expect lower performance in CTE programs as compared to traditional academic programs but the performance standards as outlined in the plan would accomplish just that. Specific edits: p. 149. The baseline can be set based on the data developed about CTE concentrators as a student group; however, the long term goal must be the same as the goal for all student subgroups as adopted by the SBE. • Four-Year Graduation Rate: The four-year graduation rate is based on who should be counted in the numerator and denominator. While the CDE staff recommend that the SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCAP... . Duplicate; important.

Second, the State may be depressing its targets by maintaining the same performance target over two years (as described above) in an effort to comply with the following provision in Perkins V that allows the state to adjust its performance levels after two years: “Prior to the third program year covered by the State plan, each eligible agency may revise the State determined levels of performance for any of the core indicators of performance for the subsequent program years covered by the State plan...” [Section 113(b)(3)(A)(ii)]. The state may adjust its performance levels after two years, but they must be “higher than the average actual performance of the 2 most recently completed program years...” [Section 113(b)(3)(A)(i)(III)(ee)]. Given the State’s most robust improvement currently set for its SDPLs occurs after the second program year, the State may choose to adjust its performance levels down considerably which might further stifle continual meaningful progress for CTE students. We recommend the State set its SDPLs for all indicators in a manner that demonstrates annual improvement for all CTE students to better align with the State’s approach under ESSA—and that the improvement is quantifiably meaningful. The challenge for setting the term is that the indicator for CTE pathway success in the completion of a course sequence vs. a test score. Agree, that there should be a consistency but factors contributing to CTE pathway success is not a hard number or a benchmark.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 293**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: D.3.a.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 294**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: D.3.a.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 295a**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture; Large organization; California Teachers Association; Debra Krikourian, Folsom Cordova USD.

**Perkins V Application Prompt Number: D.3.b.**

**Comment:** LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state's school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically disagrees with the proposed SDPL as printed on page 149. In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly completed the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance. The Association does not believe that it is the state's intent to create a policy that would expect lower performance in CTE programs as compared to traditional academic programs but the performance standards as outlined in the plan would accomplish just that. Specific edits: p. 149. The baseline can be set based on the data developed about CTE concentrators as a student group; however, the long term goal must be the same as the goal for all student subgroups as adopted by the SBE. • Four-Year Graduation Rate: The four-year graduation rate is based on who should be counted in the numerator and denominator. While the CDE staff recommend that the

SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCA. Second, the State may be depressing its targets by maintaining the same performance target over two years (as described above) in an effort to comply with the following provision in Perkins V that allows the state to adjust its performance levels after two years: “Prior to the third program year covered by the State plan, each eligible agency may revise the State determined levels of performance for any of the core indicators of performance for the subsequent program years covered by the State plan...” [Section 113(b)(3)(A)(ii)]. The state may adjust its performance levels after two years, but they must be “higher than the average actual performance of the 2 most recently completed program years...” [Section 113(b)(3)(A)(i)(III)(ee)]. Given the State’s most robust improvement currently set for its SDPLs occurs after the second program year, the State may choose to adjust its performance levels down considerably which might further stifle continual meaningful progress for CTE students. We recommend the State set its SDPLs for all indicators in a manner that demonstrates annual improvement for all CTE students to better align with the State’s approach under ESSA—and that the improvement is quantifiably meaningful. The challenge for setting the term is that the indicator for CTE pathway success in the completion of a course sequence vs. a test score. Agree, that there should be a consistency but factors contributing to CTE pathway success is not a hard number or a benchmark.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 295b**

**Comment Source:** K–12 Instructor (CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Efrain Mercado, Sacramento, CA.

**Perkins V Application Prompt Number: D.3.b.**

**Comment:** 133-138b. An Explanation of the SDPL Alignment to Statutory Requirements LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the

state's school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups. have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically disagrees with the proposed SDPL as printed on page 149. In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly completed the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance... . . .The Association does not believe that it is the state's intent to create a policy that would expect lower performance in CTE programs as compared to traditional academic programs, but the performance standards as outlined in the plan would accomplish just that. Specific edits: p. 149. The baseline can be set based on the data developed about CTE concentrators as a student group; however, the long-term goal must be the same as the goal for all student subgroups as adopted by the SBE. •Four-Year Graduation Rate: The four-year graduation rate is based on who should be counted in the numerator and denominator. While the CDE staff recommend that the SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCAP • Extended Graduation Rate: The state's long-term goal for the extended graduation rate is 90.5%. CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups as set by the SBE to address ESSA accountability. • Academic Proficiency in Reading Language Arts: Statewide, California students are 3 points below the standard in English language arts. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long-term performance goals in English language arts for CTE concentrators should be aligned to the long-term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state's long-term goal. • Academic Proficiency in Mathematics: Statewide, California students are 33.5 points below the standard in Mathematics. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of

Perkins V to close the achievement gap. CTA asserts that the long-term performance goals in English language arts for CTE concentrators should be aligned to the long-term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state’s long-term goal.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 296**

**Comment Source:** K–12 Administrator (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District.

**Perkins V Application Prompt Number: D.3.b.**

**Comment:** CCI needs to be College AND Career. Students are capable of meeting both.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 297**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: D.3.b.**

**Comment:** Include the teachers in the planning of the level's of performance. This can be done by survey sent to each teacher teaching that CTE course each year.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level

(SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 298**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: D.3.b.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 299**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: D.3.b.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 300a**

**Comment Source:** K–12 Instructor (CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Efrain Mercado

**Perkins V Application Prompt Number: D.3.c.**

**Comment:** LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state’s school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically

disagrees with the proposed SDPL as printed on page 149. In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly completed the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance. The Association does not believe that it is the state's intent to create a policy that would expect lower performance in CTE programs as compared to traditional academic programs but the performance standards as outlined in the plan would accomplish just that. Specific edits: p. 149. The baseline can be set based on the data developed about CTE concentrators as a student group; however, the long term goal must be the same as the goal for all student subgroups as adopted by the SBE. • Four-Year Graduation Rate: The four-year graduation rate is based on who should be counted in the numerator and denominator. . . .

... While the CDE staff recommend that the SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCAP. Second, the State may be depressing its targets by maintaining the same performance target over two years (as described above) in an effort to comply with the following provision in Perkins V that allows the state to adjust its performance levels after two years: "Prior to the third program year covered by the State plan, each eligible agency may revise the State determined levels of performance for any of the core indicators of performance for the subsequent program years covered by the State plan..." [Section 113(b)(3)(A)(ii)]. The state may adjust its performance levels after two years, but they must be "higher than the average actual performance of the 2 most recently completed program years..." [Section 113(b)(3)(A)(i)(III)(ee)]. Given the State's most robust improvement currently set for its SDPLs occurs after the second program year, the State may choose to adjust its performance levels down considerably which might further stifle continual meaningful progress for CTE students. We recommend the State set its SDPLs for all indicators in a manner that demonstrates annual improvement for all CTE students to better align with the State's approach under ESSA—and that the improvement is quantifiably meaningful. The challenge for setting the term is that the indicator for CTE pathway success in the completion of a course sequence vs. a test score. Agree, that there should be a consistency but factors contributing to CTE pathway success is not a hard number or a benchmark.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the

stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 300b**

**Comment Source:** K–12 Instructor (CTE): Education, Child Development, and Family Services; Large organization; California Teachers Association; Sacramento, CA, Kristin Montoya, Fullerton, CA.

**Perkins V Application Prompt Number: D.3.c.**

**Comment:** LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state's school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically disagrees with the proposed SDPL as printed on page 149. In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers found that included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly complete the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance... .

... The Association does not believe that state intent is a tacit policy that lower performance in CTE programs when compared to academic programs is okay. Nonetheless, the outcome that these performance standards set an achievement gap in cement is still the result of these current recommendations. Specific edits: p. 149. The baseline can be set based on the data developed about CTE concentrators as a student group; however, the long term goal must be the same as the goal for all student subgroups as adopted by the SBE. • Four-Year Graduation Rate: The four-year graduation rate is based on who should be counted in the numerator and denominator. While the CDE staff recommend that the SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCAP. •

Extended Graduation Rate: The state's long-term goal for the extended

graduation rate is 90.5%. CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE to address ESSA accountability. • Academic Proficiency in Reading Language Arts: Statewide, California students are 3 points below the standard in English language arts. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long-term performance goals in English language arts for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state’s long-term goal. • Academic Proficiency in Mathematics: Statewide, California students are 33.5 points below the standard in Mathematics. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long term performance goals in English language arts for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state’s long-term goal.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 301**

**Comment Source:** K–12 Administrator (CTE): CTE; Small organization; CAROCP. Anonymous.

**Perkins V Application Prompt Number: D.3.c.**

**Comment:** I really hope the State offers substantial support to LEAS on the development of the CLNAs, and more opportunities for technical support for Perkins V. It would be nice if the State could add some language that would outline that support.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 302**

**Comment Source:** K–12 Administrator (CTE): Hatha Parrish; CVUSD/Los Angeles.

**Perkins V Application Prompt Number: D.3.c.**

**Comment:** I'm not questioning HOW these values were determined, only WHERE I can see them.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 303**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: D.3.c.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 304**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: D.3.c.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the

stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 305**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: D.4.**

**Comment:** Please get input from the teachers.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 306**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: D.4.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 307**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: D.4.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level

(SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 308**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Perkins V Application Prompt Number: D.5.**

**Comment:** I think, more important than this is.....If you want the programs to succeed then give the teachers what they need. At my school more classes have not worked due to: 1. Lack of Equipment and materials to teach the class correctly and get by in from students. 2. Counselors not giving information to all students about the class.... or the class information is not posted on the school's website as a choice. 3. Dual enrollment classes seem to be the priority.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 309**

**Comment Source:** K–12 Administrator (Non-CTE): Linked Learning Alliance, Rachel Zaentz, VP of Communications, Linked Learning Alliance, San Francisco, CA.

**Perkins V Application Prompt Number: D.5.**

**Comment:** Recommendation (4) Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V). On page 145 of its proposed Perkins V State Plan, California indicates that it will “encourage” districts and consortia not meeting at least 90 percent of SDPLs for any core indicator for two consecutive years to determine root causes and propose solutions to close large achievement gaps. Rather than encouraging districts in this particular strategy, the state should require all districts to execute a strategy that is evidence-based, substantive, and specific. Perkins V requires eligible agencies and eligible recipients to implement an improvement plan if a state or an eligible recipient fails to

meet at least 90 percent of the performance level for any of the indicators of performance for all CTE concentrators. Additionally, when developing and implementing an improvement plan, eligible agencies and eligible recipients must “include an analysis of the performance disparities or gaps identified . . . and actions that will be taken to address such gaps” [Sections 123(a)(1) and 123(b)(2)]. In order to make continuous and meaningful progress toward improving the performance of student subgroups, which includes closing performance gaps, the State and its eligible recipients can implement an improvement plan specifically for CTE concentrator student subgroups that are not meeting at least 90 percent of the SDPLs for any indicator of performance. For example, if the State or an eligible recipient fails to meet at least 90 percent of the performance level for the state-selected program quality indicator (e.g. students earning college credit with a grade of C- or better) for a specific student subgroup (based on annual performance data), the State or eligible recipient could implement an improvement plan for the student subgroup(s) with the largest gaps in performance first. . . . The State could target state leadership funds—and the local Perkins V allocation for eligible entities and/or reserve funds—specifically to improve the performance of the individual student subgroups on the lagging indicator. A note, that the college credit is still controlled by the community college system. As an example, in Antelope Valley a community college does not have any CTE courses for dual enrollment and a limited number of core classes. There should be a more prescribed plan to address the improvement of both academic and technical content. Again, if the system was more aligned with ESSA it would allow for these plans to be streamlined across the district and divisions and not siloed for CTE improvement.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter’s input and have taken it into consideration in the revised version of this section.

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**Comment Number: 310**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Perkins V Application Prompt Number: D.5.**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 311**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

**Perkins V Application Prompt Number: D.5.**

**Comment:** Please see letter submission included at the end of this document.

**State Recommended Action:** N/A—letter

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**Comment Number: 312a**

**Comment Source:** K–12 Administrator (CTE): Craig Shiflett, Alvord Unified School District.

**Other Feedback**

**Comment:** As a past Agriculture Education CTE teacher and a current High School Assistant Principal, I feel compelled to support some parts of the draft and have some concerns. Thank you for your time and effort in improving Career Technical Education systems in the state. This plan is very important to our schools and students

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 312b**

**Comment Source:** K–12 Administrator (CTE): Craig Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Engineering and Architecture; Health Science and Medical Technology; Hospitality, Tourism, and Recreation; Transportation; Tim Reid, Nevada Union High School.

**Other Feedback**

**Comment:** The plan is comprehensive and allows up to better monitor our outcomes. In regards to fiscal, I like how this is set up for funding and the ideas behind accountability

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 313a**

**Comment Source:** K–12 Administrators (CTE): ACTE, ACSA; Gina Boster, Corona-Norco Unified School District..

**Other Feedback**

**Comment:** Thank you to everybody for their efforts in developing this document. Be sure to have an English teacher read and revise for grammatical errors and proper use of words.

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 313b**

**Comment Source:** K–12 Administrators (CTE): ACTE, ACSA, CCCAOE; Diane Walker Antelope Valley.

**Other Feedback**

**Comment:** While the overall principles and sentiments that are expressed in the plan are generally good, the document as a whole has many grammatical and punctuation errors which detract from that, sometimes making it difficult to read. For example, semi-colons are used without an initial colon at the beginning of a series throughout the document, words are missing or mis-used, tenses are incorrect, etc.

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 314**

**Comment Source:** Representing CA Community College Teacher Preparation Programs; Education, Child Development, and Family Services; Renee Marshall, Santa Clarita, 661-755-4125, Education@Renee-Marshall.com.

**Other Feedback**

**Comment:** Thank you for the opportunity to provide feedback

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: 315**

**Comment Source:** K–12 Instructor (CTE): CAWEE. Anonymous.

**Other Feedback**

**Comment:** Please reach out to the California Association of Work Experience Educators (CAWEE) and include them in this initiative. They are the driving force behind CTE and a major stakeholder but for some reason have not been consulted. [www.cawee.org](http://www.cawee.org) Thank you!

**State Recommended Action:** We appreciate the commenter’s input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 316**

**Comment Source:** K–12 Instructor (CTE): Health Science and Medical Technology; NEA; Riverside County. Anonymous.

**Other Feedback**

**Comment:** I think the most important input is that there needs to be input from the teachers that are in the classroom teaching the classes. The planning and the purchases of materials and consumables. The waste is unbelievable..

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 317**

**Comment Source:** Postsecondary Instructor (CTE): Education, Child Development, and Family Services. Anonymous.

**Other Feedback**

**Comment:** Parent feedback on community surveys is inappropriate as most parents sending their children to community colleges do not know what their child needs or how higher education systems work. Collecting this data would likely prove to be difficult, and not fruitful in meaningful information.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 318**

**Comment Source:** Postsecondary Instructor Counselor or Career Staff. Anonymous.

**Other Feedback**

**Comment:** In regards to participation in the committee, can our agency (LAUSD- Division of Adult and Career Education) be invited to participate in future Perkins V conversations.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 319**

**Comment Source:** Community-based organization; Sue Sawyer, Redding, CA.

**Other Feedback**

**Comment:** We recommend JSPAC inclusion of representatives from K–12 education that advocate for and support students with disabilities

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 320**

**Comment Source:** Director of Alternative Education and Child Welfare and Attendance; Education, Child Development, and Family Services; Large organization; California Association of Supervisors of Child Welfare and Attendance (CASCWA); Evelyn Ocasio, State President of CASCWA, Hayward Unified School District, and all of California for CASCWA.

**Other Feedback**

**Comment:** There is a crisis in California and in our nation. Our tremendous concern is that students who have been commonly described as “troublesome” due to chronic absenteeism, tardiness, incomplete assignments or not turning in work at all (often without seeking help), or not meeting deadlines, and/or other behavioral challenges for which they might have been suspended or expelled, and dropping out of school, are all severely at-risk of not successfully joining the workforce and becoming contributing members of their communities. While a significant number of these students may become enrolled in educational options/alternative schools, such as community day schools or continuation high schools that might better meet their needs than the traditional school settings in which their problems arose, these schools are too often left out when career technical education funding and services are allocated. Not only is this eventual failure to join the workforce extremely damaging for these students and their futures, it is extremely socially and economically damaging to our communities and our country. All of what was just described fall under the category of workforce readiness skills. With positive, appropriate support, many students are able to return to a path toward future personal and career success. Without such focused support on workforce readiness, many of these youth will never be able to reach and maintain a place on what is commonly considered the first rung of a career ladder. Instead, they succumb to

a permanent place in the school-to-prison pipeline. Our input today is all directly intended to add very important detail to content that our colleagues previously presented and that was incorporated into the draft plan, for which we are grateful. PLEASE NOTE, I USED THE FORMAT [[ add: text ]] to designate recommended additional text throughout the survey. PLEASE NOTE: YOUR SURVEY DID NOT PROVIDE A BOX FOR INPUT RE PAGE 131. IT SKIPPED TO " Please use the space below to provide feedback on the State's response to Prompt D.1. (pages 133-135)" WHICH I USED FOR THE FOLLOWING INPUT: Page 131 California is fortunate to have an already developed CCI with sound definitions, established collection procedures, and an easy-to-understand reporting mechanism.... The CCI is one of the state indicators on the California Dashboard and is an additional state indicator of student success for high schools. The SBE is working to adopt performance standards (i.e., five-by-five grid) for the CCI. In addition, the CCI is designed to include multiple measures in order to value the multiple pathways that students may take to prepare for postsecondary learning. [[ add: Student Engagement (attendance rates, chronic absenteeism rates, dropout rates, graduation rates) and School Climate (suspension and expulsion rates) are other California School Dashboard priorities and data indicators that reflect CTE workforce readiness skill development. ]] More to the point, the CCI becomes a potential source from which California can choose, determine, and establish the Perkins V secondary quality indicator.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 321**

**Comment Source:** K–12 Instructor (CTE): Agriculture and natural Resources; Small organization (<100 employees). Anonymous.

**Other Feedback**

**Comment:** The Importance of CTSO in Career Technical Education is vital to the growth of our students and must be a component that is supported stronger today than ever before. Students who have experience in a well organized CTSO have an extreme advantage over students that have no experience. Alternative Credentials and evaluations should be a priority if allowed in the future. A clear understanding of Advisory Committees must be a priority for the Future Success of CTE Programs.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 322**

**Comment Source:** Dual Enrollment and Outreach Coordinator at College; WACAC; Elizabeth Loudon, Lake Tahoe Community College.

**Other Feedback**

**Comment:** I appreciated the inclusion of information suggesting that community colleges and high schools need to better cooperate, and get over the territorial boundaries. I am concerned that there is no real suggestion for how to do this. Also, in the section about concurrent enrollment, it appears that concurrent is supposed to be offered very sparingly. It is implied that this is only an option for really elite students, and only when a course is exceptional (and not at the HS too). This is concerning because concurrent is one of the best ways to really bridge students to college, having them on a college campus building connections with teachers and other students. Concurrent has been too restricted, and should be supported like WBL with transportation and scheduling.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: 323**

**Comment Source:** K–12 Administrators (Non-CTE): Education, Child Development, and Family Services; Large organization (>100 employees). Anonymous.

**Other Feedback**

**Comment:** Please include Students with Disabilities in this -It is imperative!

**State Recommended Action:** We appreciate the commenter's input. Because students with disabilities are considered a special population in Perkins V, they have been included in Section B3. As such, the concern raised in this comment is already included in the plan.

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**Comment Number: 324**

**Comment Source:** K–12 Administrators (Non-CTE): Education, Child Development, and Family Services; Large organization (>100 employees). Anonymous.

**Other Feedback**

**Comment:** Might deliberate consideration and focused planning be provided in the interest of students with disabilities? Currently, this group does not have equal access

to CTE programs at the high school level. In planning for Perkins V, it might be equitable for funds to be earmarked to ensure that high school students with unique abilities, including those 18-22, are provided with CTE opportunities

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 325**

**Comment Source:** Self-advocates and family advocates of individuals with developmental disabilities, Cindy Smith, Sacramento.

**Other Feedback**

**Comment:** The State Council on Developmental Disabilities (SCDD) was created close to 50 years ago by Congress in the Developmental Disabilities Assistance and Bill of Rights Act. The purpose of the Council in every state and territory is to ensure that individuals with developmental disabilities and their families design and can access services and supports that “promote self-determination, independence, productivity, and integration and inclusion” in community life. It is this purpose that grounds the Council's comments on the State's Plan to implement the Strengthening Career and Technical Education for the 21st Century (Perkins V) Act (P.L 115-224). The reauthorization provides new opportunities to better align services and supports for individuals with disabilities to ensure they can truly access and benefit from opportunities for Career Technical Education (CTE) in a student-centered approach. CTE is an important and unique pathway to ensure individuals with disabilities develop the skills needed to be employed in competitive integrated employment (CIE), decrease poverty and move towards a life of economic self-sufficiency, independence and inclusion. SCDD commends the efforts of the California Workforce Pathways Joint Advisory Committee (CWPJAC) for its development of the Perkins V Plan but believes the Plan can be strengthened by including additional focus on individuals with disabilities and information about the strategies that CTE programs will use to ensure individuals with disabilities have equitable access to and are fully included and accounted for in CTE programs. SCDD is pleased to see the Perkins V Plan recognize that “CTE can therefore no longer continue to exist as a separate educational alternative; it must be woven into the very fabric of our educational delivery system.” (p. 16). SCDD offers the

following specific comments on the Perkins V Plan: The Act uses the term “Special Populations” (20 U.S.C. 2302(48)) to define a group of individuals who are considered to be economically and socially disadvantaged in their opportunities to access and successfully complete CTE programs. Individuals with disabilities (20 U.S.C. 2302(28) citing 42 U.S.C. Section 12102) are listed as a distinct group of individuals included in the definition of “Special Populations.” Recommendation: Given that “individuals with disabilities” is the defined term in the Act, to ensure a consistent understanding of who the Act applies to, the Council believes that the Perkins V Plan should reference “individuals with disabilities” or “disabilities” and not “special needs” through-out the Plan (See pg. 46, 49, 76, 83, 106, 108, and 166)...(continued on the following page). Thank you for considering the Council’s comments on the draft Perkins V Plan. The Council believes CTE programs provide additional opportunities for individuals with disabilities to attain or maintain CIE. The Council is interested in continuing to work to improve CTE programs for individuals with disabilities. If you have any questions or concerns, please contact our Deputy Director of Policy and Public Affairs, Cindy Smith at 916-799-8805 or cindy.smith@scdd.ca.gov.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 326**

**Comment Source:** K–12 Instructor (CTE): Health Sciences and Medical Technology; Gonzales High School; Fidencio Cuevas.

**Other Feedback**

**Comment:** Please develop a method to ensure the funding gets to the classrooms and not hoarded by districts.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 327**

**Comment Source:** Postsecondary Instructor Administrator (CTE). Anonymous.

**Other Feedback**

**Comment:** Please eliminate the "three year rule" for the use of Perkins funding.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 328**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture; Large organization; California Teachers Association; Debra Krikourian, Folsom Cordova USD.

**Other Feedback**

**Comment:** Please note: the following feedback is identical to that offered by same respondent on the state's response to prompt D.3.b.

133-138      b. An Explanation of the SDPL Alignment to Statutory Requirements LCFF, and its local accountability counterpart, the LCAP—Local Control and Accountability Plan—are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state's school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically disagrees with the proposed SDPL as printed on page 149. In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly completed the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance. The Association does not believe that it is the state's intent to create a policy that would expect lower performance in CTE programs as compared to traditional academic programs, but the performance standards as outlined in the plan would accomplish just that... ... Specific edits: p. 149. The baseline can be set based on the

data developed about CTE concentrators as a student group; however, the long-term goal must be the same as the goal for all student subgroups as adopted by the SBE. •

**Four-Year Graduation Rate:** The four-year graduation rate is based on who should be counted in the numerator and denominator. While the CDE staff recommend that the SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCAP.

**Extended Graduation Rate:** The state's long-term goal for the extended graduation rate is 90.5%. CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups as set by the SBE to address ESSA accountability. •

**Academic Proficiency in Reading Language Arts:** Statewide, California students are 3 points below the standard in English language arts. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long-term performance goals in English language arts for CTE concentrators should be aligned to the long-term goal for all student groups as set by the SBE. This will mean that because CTE

concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state's long-term goal. •

**Academic Proficiency in Mathematics:** Statewide, California students are 33.5 points below the standard in Mathematics. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long-term performance goals in English

language arts for CTE concentrators should be aligned to the long-term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state's long-term goal.

**State Recommended Action:** In response to the combined public comment on this section, feedback from members of the advisory committee, conversations with the stakeholder group, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table. We appreciate the commenter's input and have taken it into consideration in the revised version of this section.

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**Comment Number: 329**

**Comment Source:** K–12 Instructor (CTE): Business and Finance; Large organization (>100 employees). Anonymous.

**Other Feedback**

**Comment:** Thank you for giving me the opportunity to provide feedback. I like the additional focus on "equity and accessibility" but find this new focus inconsistent with the restrictions of limited schools to only six sanctioned CTSO's. I believe this restriction hurts students and limits their access to legitimate leadership opportunities and competitions. I can't help but believe that these six CTSO's were selected based on lobbying efforts rather than thinking about what is best for students and what gives students the greatest access to the numerous other options that are out there but for some reason not sanctioned by CDE.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: 330**

**Comment Source:** K–12 Instructor (CTE): Engineering and Architecture. Anonymous.

**Other Feedback**

**Comment:** All CTE teachers must have the same pay rate as any teachers.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. As a local control state, the concern raised in this comment remains a local decision.

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**Comment Number: 331**

**Comment Source:** K–12 Administrator (CTE). Anonymous.

**Other Feedback**

**Comment:** The overall process from application to reporting is so cumbersome that it makes the little amount received from the grant practically unusable. For a small district to complete all the compliance measures for a few thousand dollars is almost impossible. Small districts or grants under a certain threshold should have a simplified process.

**State Recommended Action:**

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**Comment Number: 332**

**Comment Source:** K–12 Instructor (CTE): Arts, Media, and Entertainment; Business and Finance; Large organization; California Business Education Association; Fred Jones, Auburn, CA.

**Other Feedback**

**Comment:** It would be helpful for the State to actually establish in writing the definition of what "career readiness" actually means.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 333**

**Comment Source:** Community-based organization; Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Business and Finance; Education, Child Development and Family Services; Energy, Environment, and Utilities; Engineering and Architecture; Fashion and Interior Design; Health Science and Medical Technology; Hospitality, Tourism, and Recreation; Information and Communication Technologies; Manufacturing and Product Development; Marketing Sales and Service; Public Services; Transportation; Small organization; American Association for Career Education, High School Inc., Jack E. Oakes.

**Other Feedback**

**Comment:** The development of a Perkins V updated plan in conjunction with the changes in the CTE State Plan required extensive work to meet the complex needs of California. Superintendent Thurmond is to be commended in his efforts to receive input from "all stakeholders" in the creation of a plan for the 21st Century. One specific example of how thorough the California Department of Education (CDE) pursued excellence in its State Plan is in the section on "Essential Elements of a High-Quality College and Career Pathway"(Page 165 of the State Plan). As stated in the State Plan (Page 7). "In November 2019, in response to additional public comment, the CWPJAC added a new Essential Element of a High-Quality College and Career Pathway: Strong partnerships with Industry. (listed under L. of the Essential Elements). It should be noted that additional comments also came from rank and file CTE practitioners as well as private citizens. Hopefully, the inclusion of the importance of Business and Industry

partnerships will be included in the CDE's rubric for evaluating the quality of state CTE programs.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the State level and in local implementation.

As such, we will defer this topic for future consideration either during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: 334**

**Comment Source:** K–12 Administrator (CTE): Agriculture and Natural Resources; Arts, Media, and Entertainment; Building and Construction Trades; Education, Child Development, and Family Services; Engineering and Architecture; Health Science and Medical Technology; Hospitality, Tourism, and Recreation; Information and Communication Technologies; Manufacturing and Product Development; Marketing Sales and Service; Transportation; Large organization (>100 employees). Anonymous.

**Other Feedback**

**Comment:** Who is reading this document/plan? How are we insuring this is a statewide plan for education, not just CTE?

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: 335**

**Comment Source:** K–12 Administrator (Non-CTE): Linked Learning Alliance, Rachel Zaentz, VP of Communications, Linked Learning Alliance, San Francisco, CA.

**Other Feedback**

**Comment:** The Strengthening Career and Technical Education for the 21st Century Act (Perkins V) presents a unique opportunity for California's education and industry leaders to collaboratively explore the partnerships and policies needed to integrate college and career preparation, and ultimately create more equitable opportunities across K–12, postsecondary and the workforce. Linked Learning sets the standard for excellence and equity in education. Students work harder and dream bigger when their learning connects with them and connects them to the world. Linked Learning is a proven, systemic approach that creates these connections for all students. In California and

across the nation, progress in high school achievement is encouraging. High school graduation rates are hitting historic highs in multiple locales. More students are engaging in college-level coursework and work-based learning before they complete high school—experiences that are formative to understanding career options and crystalizing personal aspirations. This is happening because more educators, district leaders and postsecondary partners are committed to delivering a high-quality pathway experience for every student and work closely with industry partners to integrate academic preparation with rigorous real-world training, as envisioned by Perkins. However, postsecondary outcomes, are not inevitable for all students. But the journey to and through postsecondary education is difficult to navigate, especially for low-income students and students of color. Far too many do not persist to earn a degree, certificate, or other workforce credential, thereby falling short of their career and lifetime earning potential. Educators, policymakers, and employers have the power to change this situation. Independent evaluation, practitioner experience, and student voices all tell us what works for young people. The measurable gains made in high schools can translate to postsecondary and workforce achievements. Strategies and lessons gained through a decade of implementation of Linked Learning—now in more than 100 school districts serving about 250,000 students –can help ensure California’s Perkins V plan is well positioned to better connect and enhance the quality of student learning experiences through K–12 and postsecondary, and to the workforce... Linked Learning is a proven approach to education that combines four components: rigorous academics, career technical education, work-based learning, and comprehensive support services. It gives students the educational and social-emotional learning supports they need to prepare for both college and career, and it helps them grow through real work experiences so they can fully participate in shaping civic, cultural, and economic life. Established in May 2008, the Linked Learning Alliance ensures that the Linked Learning approach not only grows, but flourishes in every school it touches. With a focus on continuous improvement and equipping every district to pursue high quality college and career preparation, today, 5,000 students are educated in Linked Learning’s Certified Gold Pathways—the highest quality certification. As a statewide coalition of education, industry, and community organizations who share a commitment to providing students with the highest quality college and career preparation, the Linked Learning Alliance appreciates the opportunity to reflect on over a decade of Linked Learning in California and offer the preceding feedback on California Perkins V state plan. If you have any questions regarding this feedback, please contact Anne Stanton, president and CEO of the Linked Learning Alliance at [astanton@linkedlearning.org](mailto:astanton@linkedlearning.org). For more information about the Linked Learning Alliance please visit [www.linkedlearning.org](http://www.linkedlearning.org).

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the State level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: 336**

**Comment Source:** Joe Xavier, Director, California Department of Rehabilitation.

Please see letter submission included at the end of this document.

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**Comment Number: 337**

**Comment Source:** California Committee on Employment of People with Disabilities, Maria Aliferis-Gjerde Sacramento, CA.

Please see letter submission included at the end of this document.

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**Comment Number: 336: Letter**

336. The following letter was submitted as “Other Feedback” in one submission by Joe Xavier, Director California Department of Rehabilitation. This letter was referenced in every other opportunity for feedback provided by the feedback form in a second submission by Mr. Xavier.

Dear Dr. Kotamraju: The California Department of Rehabilitation (DOR) appreciates the opportunity to provide comments in response to the California State Board of Education and Board of Governors of the California Community Colleges draft California Perkins V State Plan. The DOR agrees that California has a unique opportunity to reshape the role of career technical education (CTE) as a driver for education, workforce development, and economic prosperity for the State. The DOR is committed to ensuring that all individuals with disabilities have the services and supports necessary to obtain and maintain competitive integrated employment, achieve independence, and realize equality. Individuals with disabilities are unemployed at a higher rate than individuals without disabilities. For 2017, the American Community Survey (ACS) indicated that the employment rate of working-age individuals with disabilities in California was 36 percent, versus 75 percent for individuals without disabilities. It is imperative that individuals with disabilities have equal access to education and training opportunities, including CTE, to prepare for and achieve competitive integrated employment that provides a family-sustaining wage. Below, please find the DOR comments (note: information in brackets reflect sections and page numbers on the Draft California Perkins V State Plan as of November 2019): 1. Equal Access to CTE for Students with Disabilities The DOR applauds the early delivery of CTE to K–12 and strongly supports collaboration and coordination to achieve the plan goals and outcomes. Inasmuch as the State Plan is intended to guide state policy and practice across partner programs, as well as inform local policy and service delivery, local CTE plans should include a needs assessment related to the inclusion of students and youth with disabilities in collaboration and coordination with the local DOR district and local partners. The plan discusses how CTE begins as early as elementary school and progresses throughout the middle grades, high school, and higher education. [Section II.B.1(a), pages 17-18] For students with disabilities who are included in general education classrooms, they would likely have the opportunity to participate in the same CTE programs as all students. However, if students with disabilities are in segregated classrooms, there is concern that they would not have equal access to CTE programs as students in general education classrooms. Are there mechanisms in place to ensure students with disabilities in segregated classrooms and settings are able to access CTE? For

instance, will CTE elective classes be open to all students? The plan discusses ensuring and expanding access to CTE for special populations. [Section II.B.2(b)(ii), pages 61 and Section II.B.2(b)(iv), pages 74] While DOR appreciates that “K–12, adult schools, and the California Community College system are committed to ensuring equal access to CTE programs and support activities and services for all its students, particularly members of identified special population groups,” [Section II.B.2(b)(ii), page 61] the plan would be stronger if it included specific measures to ensure students with disabilities who receive the majority of their education in segregated K–12 settings have equal access to CTE programs. The DOR appreciates that the plan provides statistics on economic, racial, and English language learner special populations. [Section II.B.2(c)(iv), page 74] Providing such statistics demonstrates the scale of impact that CTE can have on these identified special populations. Students with disabilities may also be part of economic, racial, and linguistic special populations. It is also worth noting that in 2018 there were approximately 795,000 students enrolled in special education in California. [Special Education Enrollment by Age and Disability Statewide Report as of December 1, 2018, California Department of Education, Special Education Division. <https://data1.cde.ca.gov/dataquest/SpecEd/SpecEd1.asp?cChoice=SpecEd1&cYear=2018-19&cLevel=State&cTopic=SpecEd&myTimeFrame=S&submit1=Submit&ReptCycle=December>] In addition, the wage gap between working-age people with and without disabilities is significant. In 2017, the full-time/full-year median annual earnings of working-age people with disabilities was \$40,353. Conversely, people without disabilities out-earned people with disabilities by \$5,096 (\$45,449 median annual earnings). According to the 2018 Annual Report on People with Disabilities in America, the national poverty rate of individuals with disabilities (ages 18-64) was almost 30 percent in 2017. In contrast, the poverty rate of individuals without disabilities was estimated at 13 percent. To provide equal access to CTE that helps individuals achieve competitive integrated employment and fully participate in the community, DOR echoes the efforts to ensure individuals with disabilities can fully participate in CTE, which may include counseling and guidance, provision of adaptive equipment, and other accommodations and supports, as appropriate to the individual. [Section II.B.2(c)(iv), pages 76 and 78] 2. Cross-Agency Systems Alignment The DOR appreciates being a partner in supporting special student populations, including students with disabilities. The DOR agrees that partnerships with state agencies are essential to “better plan, implement, and evaluate services to increase opportunities for students with disabilities to enter into competitive integrated employment.” [Section II.B.3(a)(i), page 107] The DOR advocates for a “One Person—One Plan” approach when

developing the Individualized Education Program and the Individualized Plan for Employment (and Individual Program Plan, as appropriate) to ensure that transition services and career assessments support opportunities, among all partners, to explore CTE, work experience, and competitive integrated employment. Partners may include LEAs, California Schools for the Deaf, and California School for the Blind, among others. From start to finish, families must be included in the person-centered planning process, including linkages to family empowerment centers and other family organizations. It is important to identify, leverage, and align existing training programs, ensuring programs have methods of identifying and applying best practices for incorporating students with disabilities and cross training among agencies and systems. Examples of relevant collaborative training programs include: DOR College 2 Career (C2C), [The C2C program is a partnership with select community colleges to serve individuals with intellectual disabilities (I/D) and autism.] CDE Workability I (WAI), [The WAI program provides comprehensive pre-employment skills training, employment placement, and follow-up for high school students in special education who are making the transition from school to work, independent living, and postsecondary education or training.] DOR Transition Partnership Program (TPP), [The TPP builds partnerships between select local education agencies (LEAs) and the DOR to provide enhanced, coordinated vocational services including pre-employment transition services to successfully transition students with disabilities into meaningful employment.] DOR pre-employment transition services for potentially eligible students who have not yet applied for vocational rehabilitation services, and America's Job Center of California (AJCC) training services. Independent Living Centers (ILC) and local community colleges should continue or forge partnerships to engage out of school youth with disabilities in CTE. In addition to identifying, leveraging, and aligning existing training programs, the DOR supports collaborative leadership, cross-system training, and strategic initiatives to identify evidence-based practices between DOR, CDE, and other partners. These collaborative efforts could enhance participation of special populations, including students with disabilities. With respect to the braiding of funds and improving alignment between DOR and CDE, [Section II.B.3(a)(iii), page 113] DOR has increased its focus on transition services, including pre-employment transition services for students with disabilities, consistent with the Workforce Innovation and Opportunity Act (WIOA). Such services help meet the unmet transition needs for students with disabilities and help meet the need for coordinated career exploration activities that have not been widely available before or during the high school years. [Section II.B.3(a)(i), page 107] 3.

Local Control Accountability Plan (LCAP) and Multi-Tier System of Support (MTSS) Alignment The DOR supports the State's strategy of leveraging funds through

the Local Control Funding Formula (LCFF) system. [Section II.B.1(c), page 41] The DOR strongly encourages that the Local Control Accountability Plan (LCAP) establishes equal access goals that allow all students with disabilities to succeed at all levels. The DOR encourages the LCAP to consider input from stakeholders, including local special population advisory groups. The DOR strongly encourages an inclusive “carve-in” approach for CTE rather than a separate treatment for students with disabilities. This approach is more aligned with the Multi-Tier System of Support (MTSS) framework and a culture of inclusiveness. The MTSS is “an integrated, comprehensive framework that focuses on instruction, differentiated learning, student-centered learning, individualized student needs, and the alignment of systems necessary for all student’ academic, behavioral, and social success.” [Orange County Department of Education, <https://ocde.us/MTSS/Pages/LCAP-and-MTSS-Alignment-Document.aspx>] Each individual experiences their disability uniquely. The MTSS framework provides the most inclusive learning environment specific to individual student’s needs regardless of physical challenge, intellectual ability, capacity, or competency. [Connecting the Dots: California MTSS and Inclusive Academic Instruction,” Orange County Department of Education, [https://ocde.us/MTSS/Documents/CA\\_MTSS\\_and\\_Inclusive\\_Academic\\_Instruction.pdf](https://ocde.us/MTSS/Documents/CA_MTSS_and_Inclusive_Academic_Instruction.pdf)] Additionally, the MTSS framework allows students with disabilities to access CTE that is specific to their individual needs and learning style.

4. Preparing School Personnel, including Special Education Teachers, and all CTE students for Equity and Inclusion

The plan has a section on preparing teachers and faculty, including special education teachers, to provide CTE instruction. [Section II.B.4, page 114] It also discusses “CTE Teach” which provides instruction and support for individuals desiring to earn a teaching credential in specific CTE Industry Sectors. [Section II.B.2(b)(ii), page 62 and Section II.B.2(c) page 67] To further strengthen teacher preparation in working with and improving instruction for adults and students with disabilities, DOR suggests that teachers receive trauma-informed training to help them better support students in building better relationships, preventing conflict, and learning more effectively. [<https://thecornerstoneforteachers.com/truth-for-teachers-podcast/trauma-informed-teaching/>] This training is appropriate for all faculty and school personnel, including general education and special education teachers who provide instruction to students with or without disabilities, including foster youth and juvenile justice-involved youth. Many of these students have been impacted by trauma and/or have hidden disabilities. Trauma-informed training can foster positive learning environments, where students can grow, learn, and succeed in school, including in CTE. In addition to general education and special education teachers, this training would be appropriate for all staff who

support students in or outside of the classroom, including guidance counselors and paraprofessionals. In addition to trauma-informed training, DOR suggests that teachers receive disability awareness training; disability awareness training focuses on overcoming attitudes and human factors that create fears, biases, and myths related to individuals with disabilities. The DOR suggests including disability awareness and workplace diversity and inclusion in the Standards for Career Ready Practice. [Section II.B.2(b)(iii), pages 63 and 64] Disability is a natural and integral part of the human experience. The enhanced competencies on workplace diversity and inclusion further support students' long-term success, given that the workforce may involve multiple changes in career, economic, and/or medical and health conditions during the span of an individual's working years.

5. Partnering with Business and Industry The DOR agrees that local business and industry should have a role in supporting CTE and would also like to see "active industry participation, building relationships for authentic engagement and stronger connections between industry and schools." [Section II.B.2(e), page 92] Participation on local CTE advisory boards and committees are ways for business and industry to actively participate in CTE programs. The DOR recognizes that the CDE developed a CTE Advisory Committee Manual to provide information on forming an advisory committee and its functions and duties. [Career Technical Education Advisory Committee Manual, California Department of Education, Career and College Transition Division. <https://www.cde.ca.gov/ci/ct/pk/documents/cteacmanual15.doc>] A function of the CTE Advisory Committee is to help "determine what type of CTE program is offered," [Ibid, page 6] which is why it is critical that advisory boards should have a role in local needs assessments. The DOR encourages individuals with disabilities and professionals trained to work with individuals with disabilities to fully participate in CTE Advisory Committees to ensure CTE opportunities are fully inclusive.

6. Increasing CTE Opportunities through Dual Enrollment Recent State initiatives have demonstrated the State's commitment to improve cross system collaboration and program alignment to incentivize students to dually enroll in both secondary and postsecondary education. [Section II.B.2(d), page 86] The DOR supports California committing considerable resources, as it continues to endorse and encourage education agencies to develop opportunities for dual or concurrent enrollment programs. [Section II.B.2(d), page 89] Investments in technology, including online courses or distance learning, affords greater access to learning opportunities for dually enrolled students. Providing students, including individuals with disabilities, the opportunity to take CTE courses at a community college or other postsecondary education institution prior to high school graduation can help facilitate transition from secondary school to postsecondary

education and the workforce. As California strives to create a truly aligned system of education, it is imperative it builds in access points to CTE for all California students, including students with disabilities. The DOR appreciates the opportunity to provide comments on the draft California Perkins V State Plan and looks forward to ongoing collaborative efforts to further the role of CTE in providing equity and access to special populations, including students with disabilities. Sincerely, Original signature on file Joe Xavier Director

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: 337: Letter**

337. The following letter was submitted as “Other Feedback” in one submission by Maria Aliferis-Gjerde of Sacramento, CA, representing the California Committee on Employment of People with Disabilities,

January 3, 2020

Ms. Lisa Reimers, CCTD

California Workforce Pathways Joint Advisory Committee

California Department of Education

1430 N Street, Suite 4202

Sacramento, CA 95814

Dear Ms. Reimers: The California Committee on Employment for People with Disabilities (CCEPD) advances policies that promote the employment of people with disabilities in the state. With a variety of representation, the CCEPD provides a forum for state departments, the business community, and others to develop better state program coordination to increase labor market success for people with disabilities. The CCEPD commends the efforts of the California Workforce Pathways Joint Advisory Committee (CWPJAC) and appreciates the guiding principles used for the development of the California State Plan for Career Technical Education (CTE) for all students, including students with disabilities. However, the CCEPD strongly encourages additional focus on students with disabilities and strategies to ensure these students are included in CTE programs. CTE programs are the building blocks to skill attainment, allowing for entry into various career pathways based on a person’s interest and needed skills. Inclusion of students with disabilities in CTE programs is essential to improving employment outcomes thus decreasing reliance on benefits, escaping a life of poverty, and promoting a life of independence. In October 2019, the unemployment rate for people with disabilities in California was 8.9%, compared to 3.9% for those without disabilities. More alarming, the labor force participation rate for people with disabilities in the state was only 17.2%, compared to 66.8% for those without disabilities. These stark numbers illustrate why intentional and specific strategies should be included in the State Plan for CTE for students with disabilities. Overall, the CCEPD supports additional language that describes how various entities within education, such as Special Education and Disabled Student Services Programs--and entities such as Department of Rehabilitation (DOR), Department of Developmental Services (DDS) and

Independent Living Centers--can be aligned to assist students with disabilities in CTE programs, work to educate businesses, and provide professional development content for teachers related to their students with disabilities. Currently, the State Plan for CTE lacks specific strategies to increase system alignment among these entities for students with disabilities. Furthermore, the CCEPD is concerned about the data on students with disabilities, both in how it relates to the performance measures and the participation rate of students with disabilities in CTE programs. The CCEPD encourages the CWPJAC to review data as it relates to students with disabilities to determine participation rates and whether these are meeting the performance measures. The CCEPD strongly encourages and supports additional inclusion strategies for students with disabilities to both understand how students with disabilities participate and increase their numbers in CTE programs. Creating specific strategies will further the guiding principles of promoting equity and access for this population of students. Below are recommendations to improve the existing draft of the plan.

- An overview of Special Education Local Plan Areas (SELPA) and Disabled Student Programs and Services (DSPS) are included, beginning on page 105. Additional language is needed on how SELPA and DSPS can collaborate with CTE programs to address both system alignment and the student-centered delivery of services.
- Partnerships with the DOR and the DDS are referenced on page 107. The current language is overly-broad and does not describe how CTE programs will interact with DOR and DDS. The State of California has adopted the Competitive Integrated Employment (CIE) Blueprint and created Local Partnership Agreements (LPA) among DOR, DDS, and the Department of Education. CIE is referenced briefly, but we believe additional language should be included that describes these efforts in more detail, and how CTE programs can coordinate with these LPAs. Although the State Plan for CTE mentioned DOR, more discussion is needed on how DOR's existing programs can collaborate with CTE and DOR's Students Services. These two strategies will help promote system alignment with DOR and DDS.
- Accommodations, including the need for support services such as "adaptive equipment and services," for students with disabilities are mentioned on page 110. Language should be added that CTE programs can use existing processes such as the individual education plans and 504 plans for students with disabilities to secure adaptive equipment and service needs. Strategies can be developed through independent living centers for the use of devices from the Assistive Technology Device Lending Library.
- Stakeholder concerns on the lack of understanding of disabilities, including employer concerns, begin on page 112. Existing entities, such as DOR, DDS, DSPS and independent living centers, have an expertise in working with businesses, understanding disabilities, and disability benefits planning. Strategies should include

developing partnerships in those areas. • The language for preparing teachers, beginning on page 114, provides a basic overview of needs for all CTE teachers, but special populations are only referenced briefly and without specific strategies. Cultural competency curriculum for professional development should include content on disabilities, implicit bias and trauma-informed practices. Partnerships can be developed with existing entities to provide content for CTE teachers. • There is no reference to special populations or students with disabilities in the accountability for results section, beginning on page 130. The State Plan for CTE did not reference data for students with disabilities. CCEPD proposes that the percentage of students with disabilities participating in CTE programs should be in parity with the percentage of all people with disabilities in their local areas as a goal for the State of California. This would serve as a goal to increasing the number of students with disabilities participating in CTE programs. The CCEPD's belief is that more detailed strategies are needed for students with disabilities. CTE programs can improve employment outcomes and labor force participation rates for students with disabilities. The CCEPD's goal is to strengthen system alignment to improve employment outcomes for students with disabilities to decrease their reliance on benefits and a life of poverty. We look forward to ongoing collaborative efforts with the CWPJAC regarding students with disabilities. Furthermore, we have already reached out to the Joint Special Populations Advisory Committee on potential collaborative efforts. If you have questions, or would like to discuss the CCEPD's comments, please call Maria Aliferis-Gjerde, the Executive Officer of the CCEPD, at (916) 558-5698.

Sincerely,

Original Signed Damien Ladd Chair, CCEPD cc: Sharon Hilliard Acting  
Director Employment Development Department Joe Xavier Director  
Department of Rehabilitation Department Designees to CCEPDb

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

## Verbal Feedback

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**Comment Number: V1**

**Comment Source:** Craig Durfey

[cadurfey@gmail.com](mailto:cadurfey@gmail.com)

Parents for the Rights of Developmentally Disabled Children

K–12 Instructor, Researcher/policy analyst, legislative staff, consultant

Community-based organization

**Prompt: B3 and throughout**

**Comment:** My name is Craig Durfey, I'm a founder of Parents for the Rights of Developmentally Disabled Children and I've spent 23 years doing research on CTE programs in Orange County. I have documentation and records of the need for oversight and accountability for our program. There is really a need for honesty and effectiveness in our education. I've also gone across America and my website is [socialemotionalpaws.com](http://socialemotionalpaws.com). The current state of our manual for our state, 2015, we have no phone numbers, no education codes, no protocols for meetings, no Brown Act, yet Santa Rosa Junior College has the Virginia standard and Michelle has this information and I have not heard from her. I've talked to Tony Thurmond and I hope these comments will be provided to the governor and his staff as well. We need a special needs manual as well. The Career 21st Century Act (?) calls for special needs; we need to ensure that community stakeholders have transparency and now they don't. I would encourage these committees to ensure that we have for the issue of our technology K–12, it is a myth, it is causing interruption to the education process and medically and on my website, [socialemotionalpaws.com](http://socialemotionalpaws.com), I cite it's been proven medically. On your boards of education there is no transparency or documentation of their decision-making as to what we use technology for, and it's taking kids into a world that changes character and creates chronic ADHD. So if we're to do CTE programs in California, we have to realize that medically K to 12 is a fallacy and a myth and we need more transparency. Stop learning and you start dying and our society and psychologists are not keeping up and my website deals with all this.

I'm hoping you will look closely at this with a microscope and ensure that you have integrity K–12 in the process of education. Otherwise, too many kids are taking their lives over it so you have a challenge before you start your CTE program. Thank you.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is beyond the scope of the Federal Perkins V Application.

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**Comment Number: V2**

**Comment Source:** Elly Garner

Project Lead the Way

[egarner@pltw.org](mailto:egarner@pltw.org)

Curriculum provider

**Prompt: B1, B2, B4**

**Comment:** I'm Elly Garner, Curriculum and professional development provider for Project Lead the Way and CTE issues

**Section B 1 & B 2**

Two things: 1) We have some Significant concern about the level of interaction with industry and certifications in previous drafts. I was not able to attend the meeting last week in light of the holidays and we have significant concerns. We're hopeful that's been added and clarified, that workforce meetings need to be part of that process as well.

Secondly, regarding LEAs and the Local Needs Assessment; in short it should not be just one school district that's involved in a local needs assessment. Primarily because a school district is not going to cover all the regional areas and students come from outside the school district. The workforce needs can be a lot broader than the footprint of an individual district. Looking at a higher level, regional or county level or a county department of education would allow for workforce development that would be broad enough to meet those needs.

Finally, something that has been a conversation in CTE for a while, especially in California, in light of dollars for "techie" (*Inaudible*)

CTE versus more traditional CTE categories; and ensuring that dollars are available for both kinds of CTE. Both are very important for workforce needs especially in light of computer science, engineering, manufacturing all those things are vital. Perkins V on the federal level allows for all those areas to be covered, but there have been territorial issues and ensuring those are workforce needs that are addressed as well, going back to CLNA issue. A lot of computer science jobs don't require a 4 year degrees they can be certifications or programs can take students right out of high school. So ensuring those options are available and highlighted in the Perkins opportunities, especially in northern California and Silicon Valley, those are workforce needs that need to be addressed.

**Section B4**

Finally in the area of **preparing teachers and faculty**. An ongoing conversation with CTC about a CTE credential issue. There have been a number of barriers for teachers, either coming over from academic areas and not having industry hours or experience or

looking at how to get someone in the door and past the emergency CTE credential to an actual credential. Because this new Perkins plan allows for preparation of faculty, ensuring the CTC is capable of getting through all the paperwork [is important] because the backlog of paperwork is as important as the actual process of getting teachers in the door.

**State Recommended Action:** While we appreciate the commenter’s input, no changes have been made. The concern raised in this comment relates to a state policy issue and as such cannot be addressed within the Federal Perkins V Application. The intent of this comment requires a combination of policy changes at the state level and in local implementation. We will defer this topic for future consideration during the development of the California State CTE plan.

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**Comment Number: V3**

**Comment Source:** Nicholas E. Dibs

[NickDeibs1@gmail.com](mailto:NickDeibs1@gmail.com)

Substitute teacher for both CTE & Non-CTE,

Water Districts industry representative,

CTE Advocate for increasing/improving CTE in K–12 public schools

**Prompt: B2 CTE Programs and Programs of Study Implementation;  
B4 Preparing Teachers and Faculty**

**Comment:** I’ve been a credentialed science teacher since 1992; I’ve taught in 4 or more school districts in variety of capacities, including substituting in CTE classes. The draft document is 169 pages so I can’t make all my comments in 5 minutes. I will make a suggestion since there are only 7 of us here, if there’s time at the end to make additional comments, that would be nice.

I would like to comment on the local application and local needs assessment area:

**B2 CTE Programs and Programs of Study Implementation**

We have on page 48 that California by design is a local-control state, however there needs to be regional and state oversight. There also needs to be oversight by community members and stakeholders, not just by government entities. That is parents, stakeholders, individuals should have the right to have access to each school district’s local application plan and the implementation of that plan, including—because we have over 1200 LEAs in the state—each LEA should not be operating as a silo; there should be open transparency and mutual aid and accountability so that Individuals should be able to access what are the specific CTE programs that each LEA is offering. We shouldn’t have to go through a process to get the information; it should be readily

disclosed, mainly in the K–12 LEAs. **I want to suggest in the final plan, a requirement that each LEA that receives Perkins V grant money include readily available public access and transparency of the local application plan as well as a list a list of all the CTE programs and courses they provide.** This will aid the state in a number of ways; number one, the districts, the public and the parents can see what's offered in the different districts. Like we have at the community college level, if you can't get something at one community college, you can go to another one. So we need to see what's offered in a school district so that the parents can see what's offered, so that if I want my son or daughter to take this CTE class that's offered in another district, I can go over there. We can't do that unless there's readily available access to the information without a long data search to get it. Make it readily available so all the K–12 LEAs will have that information available.

I want to also comment on

#### **B4 Preparing Teachers and Faculty**

The state of New York is way ahead of us; they have the people. This is a catch22; in the sense that if you don't have the CTE classes, then the universities won't prepare the CTE teachers. We're way behind as we all know in this room- the pendulum has swung too far—that everyone is going to go to college and get a four-year degree—we know that is not the case. The state of Tennessee is providing funding for 2 year college preparation and certificate programs for anyone who wants to go tuition free. We need to get that and also implement a college promise program like Long Beach is doing, where everyone who graduates from a public high school gets at least one year and possibly two of free college tuition that they can use in either CTE pathway or academic areas. That should be included in this plan.

There are a number of other things. We need to have more involvement of the public; these statewide commissions and specialty groups; we need to have a group of lay people. The other thing is we have a significant workforce shortage. I ran for school board in Garden Grove Unified three years ago. And as I was campaigning, the district cut all 10 wood shop classes from intermediate schools and cut the auto shop program from seven down to three. As I'm meeting the public and the parents, I was told by 99% of the people that we should bring back our wood shop and auto shop classes. At the intermediate and junior high level, just have a survey class, with a little electrical, plumbing, wood shop, a little of this and that, and we have the pathways at the high school. I would request we have additional time when everyone has had their five minutes.

Thank you.

**Nicholas Dibs** (*requests additional time and given five more minutes*)

In addition to working as a substitute teacher, I worked for the California Department of Water Resources on a state water project where my job was to provide water education programs and provide tours of state water project facilities for VIPs, community members, teachers, and so on. In that capacity and having successfully completed 3 community college courses in the water science program; I'm a licensed water treatment operator, licensed water distribution operator and have my waterworks association certification in water conservation. Having gone to a number of water district meetings, we have a shortage on the horizon in water operations and the water field—that's one of the areas. Yet very few high schools have any way of letting students know about this. That isn't the only career shortage area, there are many others including construction. We have a housing shortage in this state yet many LEAs are refusing to have any construction pathway, including Garden Grove Unified. They don't have a construction pathway or a water operations pathway. Garden Grove cut all the wood shops and auto shops in the intermediate One of those auto shops was due to shut down and I intervened and got it reinstated back to full time a couple yoears ago. I recognize that we have to have more CTE, not less.

We need to have more CTE, not less and we need to have it done in a way that's more transparent to the public. That's why I'm urging that in this plan we need a mechanism whereby the Local Application Plan and all the CTE courses and pathways are provided by each LEA, so we can see what's being offered statewide, from north to the south, whos' offering what. That will help parent groups and industry groups see where do we have a particular need for CTE in this area. Because a student in K–12, in high school particularly, if they know they want to focus in on water operations, if it's not offered in Garden Grove but it's offered in Long Beach, then they can go over there and take that. But if we're kept in the dark, as stakeholders, community members and the public, if we don't have readily access to what is being provided by each LEA, simple list—what CTE classes are being offered and the local application plan, so we can see from district to district what's being done where.

So we can see from district to district what's being done where. That will be a big help. We have to use what the state of TN is doing already; they have the most, the highest offering of graduates that graduate from a community college with certificates and para-professional training and we need to implement the College Promise program statewide. A number of districts have the College Promise program but many don't. Long Beach Unified started it but many don't. Ortiz is well aware of it and what it's doing and it needs to be statewide. College Promise will include the CTE in there, so they go from the high school pathway to the community college.

Thirdly, I'm asking that there be some sort of a committee or entity allowed so someone like myself, parents and stakeholders can be part of a citizens advisory group. Let's have another opportunity for teachers and lay people to weigh in so we can improve our CTE programs. Thank you for letting me have another 5 minutes.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the state level and in local implementation.

As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: V4**

**Comment Source:** Lisa Amos

Mt San Antonio College

[Lamos1@mtsac.edu](mailto:Lamos1@mtsac.edu)

CTE Post-Secondary Instructor & Perkins Faculty Coordinator at Mt San Antonio College

**Prompt:** Did not state

**Comment:** I started working on Perkins IV eight years ago and thought I would do it for a couple years until Perkins V—but here we are just transitioning.

My concern is that we're seeing all this and hearing about the state plan and it's going in April 15 and as it's been in the past, our applications are due May 15. We know nothing about the process; we know nothing about what anything is going to look like, including our Comprehensive Needs Assessment. We don't even know where to start. We're told we have to put together an advisory committee and start planning, but we don't know what to plan to. We're working in the dark. We're telling our programs they need to have their advisory committees meet to plan what their needs are. We don't know if we should tell them to plan to the federal plan or if the state plan will be more restrictive and that's going to throw things in a loop for them. So that's where we are.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: V5****Comment Source:** Anne Younglove Newport-Mesa

K–12 Counselor or Career Staff

[ayounglove@nmusd.us](mailto:ayounglove@nmusd.us)**Prompt:** Did not state

**Comment:** I'd like to address this gentleman's concerns. I represent a middle-high school district, Newport based school district; grades 7-12- and we are members of Orange County Consortium. In Orange County we already have a process in place where all community college and high school districts are mapped out showing students if they're interested in construction, in water management or other pathways, which colleges offer it. where all community college districts showing which colleges offer which pathways. All of those us who have written to the Orange County Pathways grant; the CTE grant and Perkins grant are all building a consortium of people from all the high schools and all the community colleges in the county, working together to get the information out to our high schools and to our industry representatives. It's very important that they are the ones driving what we're doing and the choices we're making in middle schools, high schools and community colleges. Because for example we're starting 7-12 engineering program in Newport Mesa.

It's important as college people for you to know what we're doing. Your college programs are on the grid; it's being done by Orange County Department of Ed. We're thinking of rolling over to Long Beach because there are districts in the northern part of Orange County that utilize the Long Beach and Los Angeles community college districts.

We're moving—we're doing a tremendous job of bringing CTE back into the classrooms, back into the focal point—by portfolios being driven by university requests—not just your grades but what have you done and that's happening in CTE. Most technology taking place in K–12, it's the T in CTE, it's technology driven. It's not perfect;

we just had a meeting this morning of what Perkins is going to do for us in secondary, how we've going to have to address our CNA; we talked about gathering CALPADS data; we are in the same place as you are, making decisions and dates. I didn't want you to feel you're all by yourself *[referring to prior speaker]*.

Having read the actual Perkins plan, the new plan -= it's the first time our state is looking at it from a national point; Perkins is trying to get us all on the same page and that's not all bad. Because how do we gather data if everybody does their own game. We have to have something consistent. In that we're going to find out where we fit

across the board. We are a very unique county, I can't say this enough—we are a model county for the state of California because of the collaboration taking place. It was driven originally by the Orange County Pathways grant that has brought the high schools and colleges together and it's being furthered with the CTEIG grants and with Perkins. The more we can get together, the more we can communicate. If you need more information, see the website OCPathways; it gives you all the names of the companies, the map grip I told you about, it's a huge resource. The more we can come together, like Coastline Community College with Newport Mesa, with Rocha Santiago with north Orange County, the more we can all get together the less problems it's going to be because we're a force with the state. It has to be spoken from all of our voices; one voice gets you nowhere.

**State Recommended Action:** Thank you for your time and sharing your thoughts.

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**Comment Number: V6**

**Comment Source:** Tara Sanders,  
Contra Costa Community College

**Prompt:** Did not state

**Comment:** In other states, the state workforce board facilitates part of the conversations [about Perkins funding]. I know that's not what we're doing here; is that something we could consider for our future?

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: V7**

**Comment Source:** Sheryl Plumley, Riverside CCD

**Prompt:** Did not state

**Comment:** I noticed the plan did call out secondary to post-secondary articulation in a couple of places, but in the budget I didn't see any set aside for CTE transitions and wondered if that was going to continue or if that's built into the community college's roughly 50%.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: V8**

**Comment Source:** Jennifer Galbraith, Mt San Antonio College

**Prompt:** Did not state

**Comment:** You opened it up to implementation, so I'm having a lot of concern if we're waiting until April 2020 when the state plan is going to be finished, and then what is our turn around going to be for our applications and our plans? I want to get the point out there, that there is concern for the tight timeline. I'm worried this is not enough time.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: V9**

**Comment Source:** Brian Deis, Lake Elsinore USD

**Prompt:** Did not state

**Comment:** I'd like to piggy back on that for secondary. We have the same timelines and this is making me nervous. We just had a webinar about CALPADS and they hope to get a template to us in a few weeks, but we go on winter break and then it's due in February. We hear a lot of "we think, we think" but yet we've got these timelines we're going to be held to so there's concern on our end.

I have two more points. You mentioned a new definition of concentrator; it's now after completing two years of a program (When we were doing a workshop down south, we talked about that with a lawyer working on this; it doesn't designate how many hours each course is?

My second point: From a K-12 perspective we're part of the Inland Empire Desert Consortium, when we got into it we wondered if it would be big brother telling little brother what to do but in fact it's been a great opportunity working with our community colleges. The consortium has been great and a good collaboration.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: V10**

**Comment Source:** Dorsie Brooks, Golden West College, Coast Community College District

**Prompt:** Did not state

**Comment:** When it comes to the core indicators and how those metrics are being calculated; we need time to implement them and I'm hoping that's included in the

transition plan that we'll have some time. Knowing our data people will need time to get MIS to catch up with what we need. With the new special populations, how are we as institutions capturing that information, especially for things like homelessness that we may not have in other places.

**State Recommended Action:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

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**Comment Number: V11**

**Comment Source:** Randi Kay Stephens, Institute for Local Government

**Prompt:** Did not state

**Comment:** I haven't read the plan and I'm new to this world. I'm trying to understand the Perkins language. I'm looking to understand consortia, how they operate, and what they mean for different types of career sectors. I'm looking for more clarity on what it will mean for specific career groups.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment is already included in the plan.

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**Comment Number: V12**

**Comment Source:** Unnamed, K-12 representative

**Prompt:** Did not state

**Comment:** I'd like to say something as a K-12 representative. For the past 3 years I've been attending the regional consortia meeting of the community college and it's been invaluable. It's helped me understand the language of my community college counterpart and the labor market data and their centers of excellence that do the research data. I would encourage folks to reach out to their community college partners; I got invited and ever since have been attending. I'd love to see more of that happening.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concern raised in this comment relates to systems alignment issues that will be addressed through collaborative discussions at the state agency level.

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**Comment Number: V13**

**Comment Source:** Christina Van Alfen, College of the Siskiyous

**Prompt:** Did not state

**Comment:** I haven't read the whole plan so I don't know if this is in the plan; my understanding is the three-year rule for funding, that you can only fund something for

three years. I would request that we remove that requirement or that rule; I understand that's a state decision.

As the funding we receive at the community college level, that's split between 1C and the transitions, I would like to see those funds rolled together and leave it as a local decision as to how we want to spend those funds. It makes it difficult, especially with the three-year rule, and not being able to spend, the combination of those two makes it very difficult; I'd like to see those funds rolled together and leave it as a local decision as to where they go.

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the state level and in local implementation.

As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V.

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**Comment Number: V14**

**Comment Source:** Darlene Jackson, Dean, Sierra College

**Prompt:** Did not state

**Comment:** I'm wondering with one year funds—they don't roll over like adult ed or Strong Workforce Funds (SWF)—in our plan though if we're using or leveraging SWF funds that would continue into the following years, would we be identifying that, should we or can we do that? How do we show that braiding or leveraging or balancing when Strong Workforce Funds continue beyond one year?

**State Recommended Action:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the state level and in local implementation. As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V.

## **Written Correspondence**

**A handful of organizations submitted written correspondence directly to the California Department of Education. Those letters that were submitted during the public comment period and were not submitted verbatim via the online feedback form are included below. Following those letters, please find the State Recommended Action.**



December 20, 2019

Pradeep Kotamraju, Ph.D  
Director Career and College Transition Division  
California Department of Education  
1430 N Street  
Sacramento, CA 95814

**Re: Draft Perkins V State Plan for Career and Technical Education Public Comment**

*Submitted via e-mail to [path2work@cde.ca.gov](mailto:path2work@cde.ca.gov)*

Dear Dr. Kotamraju:

The California Dental Association, representing 27,000 member dentists across the state, appreciates the opportunity to provide public comment on the Draft Perkins V State Plan for Career and Technical Education. While CDA is overall supportive of initiatives geared towards career and technical education and pathway/pipeline programs for health careers, we would like to see oral health included as a specific CDE Health Industry Sector and Pathway, so that these funds may be used for career pathways to dental careers, some of which are currently facing significant workforce shortages.<sup>1</sup>

Due to dental workforce and broader economic trends, dentists are finding it more challenging to hire and retain qualified registered dental assistants (RDAs). RDAs are a vital component of the dental workforce, a position with relatively low barriers to entry they are the first rung on the dental career ladder. They are essential part of the dental team, ensuring dental practices of all sizes operate to their fullest capacity. While the number of dentists and dental hygienists entering the workforce rose steadily between 2006 and 2018, the number of employed dental assistants dropped considerably, particularly in California's coastal cities. As of August 2018, several counties have

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<sup>1</sup> California Department of Education. [Draft California Perkins V State Plan Appendix C: Industry Sectors and Pathways Alignment](#). Page 162. November 2019.

significant RDA shortages such as San Francisco County where there is one RDA to every 2,000 residents and Alpine County where there are no RDAs whatsoever.<sup>2</sup>

There is significant and consistent opportunity across the state for individuals with RDA licensure and experience. The RDA staffing shortage is already affecting underserved communities and areas just barely meeting dental workforce demands, when dental practices that have to turn away patients due to their workforce capacity. Additionally, in recent years there has been significant state investment to increase access to oral health care through expansion of Medi-Cal dental benefits that over 13 million Californians are eligible to utilize. It is more important than ever that the dental workforce meets the increased demand of dental services.

Similarly to behavioral and mental health pathways already included in the crosswalk, oral health pathways are also critically needed at this time and require specialized training beyond "patient care" career pathways. Until health care is truly integrated, it is imperative to continue to intentionally invest resources in specific branches of patient care, such as oral, behavioral and mental health, that are experiencing disparate workforce shortages.

Specifically calling out the need for an increased investment in oral health career pathways will ensure that educators, schools, and students are aware of the full career ladder available within the field of oral health. The recommendation of including oral health as a specific health pathway within the industry sector crosswalk focuses on ensuring the public sector benefits in multiple ways—both with the increased provision of oral health care for all Californians and increased opportunity for gainful employment.

Please do not hesitate to contact me at [mary.mccune@cda.org](mailto:mary.mccune@cda.org) or (916)554-5359 if you need any additional information. Thank you.

Sincerely,



Mary McCune  
Legislative & Regulatory Advocate  
California Dental Association

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<sup>2</sup> Dental Board of California, Dental Assisting Council. [Update on Dental Assisting Licensing Statistics](#). Page 111 . October 9, 2019.

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December 20, 2019

Catalina Cifuentes  
Deputy Superintendent of Public Instruction  
California Department of Education

Dear Ms. Cifuentes:

RE: Comments regarding the 2019-20 CA. State  
Transition Plan for Career Technical Education

From 2013 through 2019, the California Department of Rehabilitation in partnership with five State agencies (including the Special Education Division of CDE) conducted a research and demonstration effort (entitled CaPROMISE) funded by the US Department of Education to assist students between the ages of 14 and 16 (at selection) who have an identified disability and are recipients of Supplemental Security Income and their families to complete high school, transition to adult life and become self-sufficient. This was a \$55 million-dollar study that included 18 LEA partners, over a 125 school districts and a rigorous experimental and control research design. The intent was to enable the students to complete high school with either a diploma or a certificate, complete work experiences and prepare for postsecondary education or training and eventually competitive integrated employment. Based on this research and our professional experiences as educators and researchers we provide the following six recommendations for the 2019-2020 California State Transition Plan for Career Technical Education (CTE).

- 1. It is recommended that admission criteria be expanded to include functional academic performance and not solely the attainment of academic credit and a traditional diploma.**

**Rationale:** The CTE Plan document's primary focus is the linkage and acquisition to academic coursework and acquiring a diploma and degree. This is to be commended for many of the students. However, there are a wide range of students (i.e., identified as marginalized students in the Plan) who benefit from a functional curriculum rather than an academic curriculum with comparable academic accomplishments. Further, there are a many students with an IEP that are entered into a certificate track, rather than a diploma track, and do not have the opportunity to complete academic coursework and will, in most instances, be precluded from enrollment in CTE programs. It seems that there must be latitude in the interpretation of the academic requirements for targeted students groups such as those from marginalized student groups, including students with a wide range of functional disabilities.

**2. It is recommended that CTE set minimum enrollment and completion targets and dedicated funding for students with an Individual Education Plan (IEP) who are seeking enrollment in Career and Technical Education programs.**

**Rationale:** While the Plan references services to marginalized students (point B(2-a): *a diverse student population, many of whom are not proficient in English, have special needs, or may be the first in their family to attend college or postsecondary training*), there seems to be no objective measures that quantify their engagement. If these marginalized students, including students with significant disabilities, are going to be one of the targets for the CTE Plan, there needs to be specific targets for enrollment as well as documented evidence of the student s' progress and completion and successful employment. Without specific targets, quantifiable expectations, dedicated financial resources and collaboration with other workforce development programs, it will be virtually impossible to determine the viability of the Plan for these marginalized students.

**3. It is recommended that the documented enrollment and outcome measures are included in CDE's dashboard to provide local accountability criteria and statewide evidence-based accomplishments.**

**Rationale:** The guiding principles of "*student-centered*", "*equity*" and "*access*" are applauded as key elements of the CTE Transition Plan (page 6 of the plan). However, there is limited discussion regarding tasks such as outreach, selection, enrollment, instruction and expected outcomes with students who are traditionally outside of the typical student populations (i.e., marginalized students). There does not appear to be any specific programmatic structure or expected evidence-based outcomes for the various student groups identified on page 5, point 2 (a). which states: "*... meet the educational and technical skill needs of a diverse student population, many of whom are not proficient in English, have special needs, or maybe the first in their family to attend*

*college or postsecondary training*". It is critical that there are minimum targeted outcome measures for each of the guiding principles to ensure the marginalized students are fully included in the CTE Plan. Including these measures in the CDE dashboard will strengthen the importance and relevancy of these guiding principles.

- 4. It is recommended a significant increase in the funding for Institutions (the general category) and earmark funds for each of the three identified specialized institutions.**

**Rationale:** In Section IV Budget, point B — Budget Form, only 0.8% is allocated for individuals in Institutions (line 4) and there is no allocation for Correctional Institutions, Juvenile Justice Facilities and Institutions that serve individuals with disabilities (lines 4a,4b and 4c). It seems that the total percentage for these institutions is very low and there are no recommendations for mandatory funds for each of the Institutional categories. These Institutions traditionally serve youth who are in dire need of career and technical education. Further, youth in the correctional institutions typically have disabling conditions such as learning disabilities and intellectual disabilities. There is no question that these students will meet the definition of a marginalized student.

- 5. It is recommended that expected competencies of teachers and educational support staff be articulated, have an explicit expectation that the local LEAs will ensure instructional staff receive training and, if necessary mentoring, and earmark funding at the State and local levels to provide the necessary training and instructional resources.**

**Rationale:** Providing student-centered education often requires unique skills for teachers and educational support staff. Frequently, this requires the principles for universal design for learning and multi-tiered supports. It often includes alternative means to measure an individual student's performance. Providing alternative instructional strategies for students who have unique learning patterns requires specialized training and, in some instances, knowledge and use of accommodations including assistive technologies. While staff development is mentioned, the principles are generic and do not target the needs of the marginalized student populations.

- 6. It is recommended that with each of the responses in the Plan, the authors should first examine each criteria and strategy through the perspective of the student-centered focus and their ability to access, learn and complete the training programs with accommodations. This approach will place the**

**student-centered expectations first and foremost in the planned educational experiences.**

**Rationale:** There is extensive discussion throughout the plan to ensure access by students who represent special populations (as cite previously). This discussion embodies the person-centered approach espoused as one of the underlying principles for the CTE Plan. However, when reading the responses to the various mandated requirements, the responses focus on the structure and framework at both the State and local levels. Virtually all of the discussion provides mandated criteria regarding the recipients qualifications, conformance to various State guidelines and established academic criteria. The "*lenses of conformance*" is through the various organizational entities that will be providing the various career pathways and the career and technical education. The only real mention of the student-centered efforts is that the student is the enrollee of the program and must conform to all of the pre-established criteria with limited flexibility for alterative selection and learning strategies. This approach negates the Plan's responsiveness to the expectations, needs and capabilities of the individual student and may negate the impact of the guiding principles.

We commend your efforts for the development of the CTE Plan. If you have any questions or comments regarding our recommendations please contact us.

Regards,



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[date]

[address]

The California Teachers Association appreciates the opportunity to review the Perkins V draft plan. The Association created a workgroups composed of members from CTA's standing policy committee on Adult, Alternative, Career, and Technical Education (AACTE) as well as the Community College Association (CCA) which represents educators in California's community college system. The Perkins V State Plan is laid out as responses to a series of prompts. Some of these prompts were addressed in the approved California Perkins V transition plan and were expanded further in this draft. The Plan responds to prompts for the following strands:

- Plan Development and Consultation
- Program Administration and Implementation
- Meeting the Needs of Special Populations
- Preparing Teachers and Faculty
- Fiscal Responsibility
- Accountability for Results

CTA's key concerns are related to stakeholder engagement, educator recruitment and retention, and program accountability.

## CTA's Response to Perkins V Plan

Pages	Section Title	CTA comment
<p><b>Pages 4 -14 Plan Development and Consultation</b></p> <p>The Perkins V State Plan lays out how the state developed the process for stakeholder involvement and how the public comment to the Plan has been solicited.</p>		
7-10	<b>Stakeholder Involvement</b>	<p>Section 122 (c)(2) of Perkins V requires consultation with a broad range of individuals representing a diverse group of stakeholders. The Association asserts that the statewide advisory committee list in Appendix A is not diverse; the composition of the group does not provide for the kind of balance that assure parity for the voice of classroom practitioners. In a statewide advisory group of over 90 program administrators, there is one classroom teacher. CTA believes that was not the intent of the statute and certainly is not characteristic of the California way. <i>The state must balance the representation of classroom teachers on this very important statewide workgroup to ensure that the voice of the practitioner is heard and integrated into the plan.</i></p> <p><i>The CDE should hold itself accountable for its stakeholder engagement practices. While the Association appreciates the efforts of the department to include additional teacher sessions, the failure of the department to appoint only one classroom remains a clear concern.</i></p> <p><i>The narrative in the stakeholder involvement section is not accurate. The state used a consultative approach for stakeholder</i></p>

*involvement, where joint activities were undertaken by both stakeholders groups and the project team which informed the final decisions made by the project team. The plan suggests that extra steps were added for meeting with classroom teachers as part of a purposeful plan to seek stakeholder input. The reality is that it is easier for a program administrator to attend these meetings than for LEAs to willingly dedicate funding to support the release of classroom teachers. Unlike the single classroom practitioner on the statewide advisory group, no administrator was required to pay for their own substitute. LEAs receive funds from this plan and other CTE revenues; funding leadership activities such as participation on statewide advisory committees is an appropriate use of these funds. The state can clarify that flexibility in multiple guidances connected with the implementation of this plan to enable the release of classroom teachers.*

Specific edits

Page 8, last paragraph lines 2 and 3 change “....The SSAC was composed of academic and CTE teachers ...” to “The SSAC includes only one certificated classroom practitioner,....Seeking to reflect the voice and views from classroom practitioners across the state, the design team decided to add targeted stakeholder meetings to the plan development schedule.”

**Pages 15 -105 Program Administration and Implementation**

This section includes an explanation of the how CWPJAC’s Guiding Policy Principles and the Essential Elements of a High-Quality College and Career Pathway support the Plan. Community college and workforce development programs are also described. The strand lays out how secondary and community college CTE programs are approved and how

these approval processes address academic and technical achievement, expanding CTE to special populations, and employability skills. The strand also addresses how the state will undertake efforts to promote CTE program awareness, secondary and post-secondary collaboration, including dual enrollment.

**State Vision for Education and Workforce Development**

<p>15-39</p>	<p>a. State Career Technical Education (CTE) Programs Aligned to Education and Skill Needs of Employers</p>	<p><i>The Association feels the state did not thoughtfully respond to the prompts in this section in a way that articulates a clear and thoughtful plan for the transition of high quality ROP programs to the broader CTE vision being funded through this plan. The Regional Occupational Centers and Programs, which for 40 years have offered a wide range of career classes from cosmetology to engineering as part of the high school curriculum, no longer receives dedicated funding. The loss of dedicated funding “has accelerated the demise of individual high school classes such as automotive shop. The loss of dedicated funding for the career centers and programs is part of the recent overhaul of California’s complex school finance system aimed at giving school districts more control over how they use state funds.</i></p> <p><i>The decline reflects a shift in the state’s priorities away from traditional occupational classes such as auto shop or carpentry to career-oriented programs that put students on a college track. Some stakeholders contend this shift is needed to ensure that students have as many options as possible when they graduate from high school.</i></p>
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		<p><i>The plan narrative does not adequately explore why the remaining Regional Occupational Centers must compete with other district priorities. Regional occupational centers and programs will remain viable if they provide courses that are key to local economic growth and maximize opportunities for students; but if they don't, they will close. For example, ROP programs simply disappeared in San Diego County and Los Angeles County. Long Beach ROP and East Bay ROP in Oakland – have closed. The closed ROP programs (eg., truck driving) did not fit within the CTE guided pathways plans and simply were not picked up for funding by the high school unless industry partners stepped in. CDE should examine if the loss of these programs is overlooking students who want to be prepared to enter the work force or a short-term training program directly out of high school.</i></p> <p>Specific edits:</p> <p>Page 15 paragraph 2, line 3, add "...demands. Whether a school district or county office of education is considering maintaining an existing CTE program or starting a new one, CTE is a critical component of a broad and deep school curriculum that helps prepare all students to be career and college ready.</p> <p>Page 29</p> <p>Several California Community Colleges are now offering specialized Bachelor's Degrees. These degrees are not offered in any UC or CSU. All were scheduled to begin by the 2017-18 academic year.</p>
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		<ul style="list-style-type: none"> <li>• Airframe Manufacturing Technology, Antelope Valley College</li> <li>• Automotive Technology, Rio Hondo College</li> <li>• Biomanufacturing, Mira Costa College</li> <li>• Biomanufacturing, Solano College</li> <li>• Dental Hygiene, Foothill College</li> <li>• Dental Hygiene, West Los Angeles College</li> <li>• Equine and Ranch Management, Feather River College</li> <li>• Health Information Management, Mesa College</li> <li>• Health Information Management, Shasta College</li> <li>• Industrial Automation, Bakersfield College</li> <li>• Interaction Design, Santa Monica College</li> <li>• Mortuary Science, Cypress College</li> <li>• Occupational Studies, Santa Ana College</li> <li>• Respiratory Care, Modesto Junior College</li> <li>• Respiratory Care, Skyline College</li> </ul>
42-47	c. Joint Planning to Support Vision and Goals	<p>Page 43, new paragraph: “CTE provides proven models for assisting LEAs in offering programs and curricula consistent with the LCAP requirements:</p> <ul style="list-style-type: none"> <li>• CTE helps satisfy the California Education Code (Ed Code) language encouraging districts to provide all pupils with a rigorous academic curriculum that integrates academic and career skills, incorporates applied learning in all disciplines, and prepares all pupils for high school graduation and career entry.</li> <li>• All CTE programs are prepared in line with CTE Model Curriculum Standards and newly instituted Common Core State Standards requirements.</li> <li>• CTE courses offer articulation agreements and dual enrollment options for schools to partner with local</li> </ul>

		<p>colleges so students have an early awareness that college is a possibility.</p> <ul style="list-style-type: none"> <li>• Students in California Partnership Academies (CPA) were much more likely than their high school peers to complete academic a-g courses needed for admission to California’s public colleges and universities— 57 percent to 36 percent.</li> <li>• Students of Regional Occupational Centers and Programs were typically from lower achieving and lower socioeconomic status than peers, but were just as likely to enroll in postsecondary education and eventually earn higher wages.</li> <li>• CTE has been found to increase school connectedness, reduce behavioral problems related to suspensions and expulsions, and reduce dropout rates among all student groups — especially among students most at risk of dropping out.</li> </ul>
<p><b>Pages 114 -119 Preparing Teachers and Faculty</b></p> <p>The focus in this strand is on teacher and faculty recruitment and retention strategies beyond professional development. Input received by stakeholders and targeted key informants comprised of mainly secondary teachers from across the state was included.</p>		
114-118	Teacher Recruitment and Retention	<p><i>CTE programs need well qualified CTE instructors; yet, CTE teachers are disappearing from the workforce. California schools are still dealing with the 20% drop in the number of career technical high school teachers which occurred between 2011-12 and 2012-13. The CTE teacher shortage continues to grow and the potential solutions need to be more innovative.</i></p> <p><i>The pipeline to recruit these instructors varies with the industry sector. The Association asserts the plans for teacher recruitment</i></p>

		<p><i>is incomplete and doubts the success for the strategies suggested. The responses to the prompts are not aligned to our current reality. For example, existing state law defines any person who is employed to teach at a CCD for not more than 67 percent of the hours per week to be considered a part-time, temporary employee. (EC § 87482.5). Nursing instructors must meet a unique set of qualifications from other community college faculty. Many clinical nursing instructors continue to serve as practicing licensed nurses while teaching, leading to a larger number of part-time nursing faculty. Due to the long hours required in the clinical component and clinical rotations, part-time faculty can quickly exceed the 67 percent cap. An exemption to this cap is necessary to ensure the continuity of education for students and to meet the requirements of clinical sites.</i></p> <p><i>In 2006, an exemption to the 67 percent cap for part time faculty was established for clinical nursing faculty SB 1309, (Scott, Chapter 837, Statutes of 2006), the law was renewed in 2014 (SB 860, Budget Committee). The law sunset on December 31, 2015. The exemption allowed part-time clinical nursing faculty to be employed full-time on a temporary basis for up to four consecutive semesters at one district. According to the CCCCCO during the four year period that this exemption was in place, 21 colleges hired a total of 155 adjunct nursing faculty and were able to serve an additional 351 students each year. Colleges also reported that this exemption allowed them to be more competitive with the private sector in hiring and retaining faculty. The plan</i></p>
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		<p><i>applies an “one size fits all” approach of teacher recruitment at a macro level and across industry sectors without considering the variance of recruitment needs and likely outcomes as illustrated by the example about nursing programs.</i></p> <p>Beyond recruitment, the plan does not fully consider a very important retention policy. For example, the Association asserts there is a need to give CTE teachers the right to earn permanent status. Most CTE teachers are considered “ROP.” Under ED Code, ROP teachers are not considered permanent teachers with due process rights. Similar to all the ideas proposed in this section, changing the employment status of CTE instructors will require legislation.</p> <p>Current law prohibits teachers at regional occupational centers or programs (ROC/Ps) from being classified as a permanent employee of a school district, regardless of the amount of time they work. Existing law distinguishes school districts with an average daily attendance of less than 250 students by utilizing different criteria when determining an employee's classification status, which has prevented many employees from receiving permanent status. For county office of education, only certificated employees in teaching positions may be eligible for permanent status, leaving other certificated employees without the ability to receive proper classification.”</p> <p>Specific edit:</p> <p>Page 115, paragraph 3: “In addition, the state must review out of date statutory limitations on permanent status based on ADA.</p>
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**Pages 133 – 141 Accountability for Results**

This section describes the criteria for choosing an indicator of program quality, the procedure for arriving at state determined performance levels (SDPLs) for both.

133-138	b. An Explanation of the SDPL Alignment to Statutory Requirements	<p>LCFF, and its local accountability counterpart, the LCAP – Local Control and Accountability Plan - are anchored by the notion that California must do better for its underperforming students, who in fact make up a sizable portion of the state’s school-age population. In the LCAP, the LEA must establish goals for all students and the statutory student groups across priority areas defined in statute. All student groups have the same long-term goal, student groups with lower baseline performance will need to make greater improvement over time to reach the long-term goal. CTA specifically disagrees with the proposed SDPL as printed on page 149.</p> <p><i>In a September 2013 study, Longitudinal Description of Students in California Partnership Academies, the researchers included findings that California Partnership Academy (CPA) students graduated at a rate of 95%. Further, more than 60% of these CPA graduates reportedly completed the a-g course sequence. As set forth in Perkins V, the main priority is to close the achievement gap for special populations on the Perkins core indicators of performance. The Association does not believe that it is the state’s intent to create a policy that would expect lower performance in CTE programs as compared to traditional</i></p>
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*academic programs but the performance standards as outlined in the plan would accomplish just that.*

Specific edits:

p. 149. The baseline can be set based on the data developed about CTE concentrators as a student group; however, the long term goal must be the same as the goal for all student subgroups as adopted by the SBE.

- Four-Year Graduation Rate: The four-year graduation rate is based on who should be counted in the numerator and denominator. While the CDE staff recommend that the SDPL is limited to CTE concentrators as a student group, CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long-term goal for all student groups under the LCAP.
- Extended Graduation Rate: The state's long-term goal for the extended graduation rate is 90.5%. CTA asserts that the long-term graduate rate for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE to address ESSA accountability.
- Academic Proficiency in Reading Language Arts: Statewide, California students are 3 points below the standard in English language arts. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long-term performance goals in English language arts for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower

		<p>baseline, this student groups will need to make greater improvement over time to reach the state’s long-term goal.</p> <ul style="list-style-type: none"><li>• <u>Academic Proficiency in Mathematics</u>: Statewide, California students are 33.5 points below the standard in Mathematics. The SDPL recommended in the chart are considerably lower than the current long-term performance goals recommended for targeted students. These recommendations are antithetical to the statutory intent of Perkins V to close the achievement gap. CTA asserts that the long term performance goals in English language arts for CTE concentrators should be aligned to the long term goal for all student groups as set by the SBE. This will mean that because CTE concentrators as a group have a lower baseline, this student groups will need to make greater improvement over time to reach the state’s long-term goal.</li></ul>
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**The table above was provided by the public commenter.**

**From:** Robin Whetzel <[rwhetzel@cawee.org](mailto:rwhetzel@cawee.org)>

**Sent:** Thursday, January 2, 2020 10:52 PM

**To:** SBE <[SBE@cde.ca.gov](mailto:SBE@cde.ca.gov)>

**Subject:** A Message to Board Member Linda Darling-Hammond

\*\*\* NOTE: THIS E-MAIL WAS SENT FROM THE SBE CONTACT FORM WEB APPLICATION \*\*\*

**Title:** Feedback- CTE State plan

**Organization:** CAWEE

**Comments or Questions:**

On behalf of CAWEE and as an elected CTA Union School Site Representative of 15+ yrs., I wanted to share a few updates and concerns in regards to the CTE State Plan and its process:

It has become very, very clear Work Experience Education PROGRAMS have been PURPOSELY not included in the process and has been railroaded in every step. Below are just a few examples:

1. Work Experience Education Coordinators—Teachers and Work Permit issuers are being excluded from this process. ALL stakeholders have not been included. Work Experience Education programs: Exploratory, General and Career Technical have NOT been included in any of the career pathways, etc., etc.
2. The timeline for public comments are during such events and dates, that I find intentionally exclude us in the process and participation. example: January 3 deadline: KNOWING many of us are on our Christmas break.
3. Our CDE representative, Erle Hall and other consultants were shut out. The work of writing the Plan was taken over by Rus Weikle, (who I've worked with when I taught ROP & was a member of CAROCP), and people he invited in the process are from the ROP's. Our consultant, Erle Hall, was only apart of the process "leading up to writing the state plan". He had submitted our framework that featured WEE. After submission of WEE's framework, he was shut out, along with other consultants. He responded to a draft of the Plan that had left out WEE, altogether, from work-based learning and our responsibility in ED Code of WEE Coordinators issuing work permits. I don't believe his edits, that were submitted, were ever considered?
4. CAWEE—CA Association of Work Experience Educators offered to hold a public comment session during our October 2019 conference in SACRAMENTO. CAWEE, nor

Erle Hall, was NOT given a reply to our offer. A HUGE miss, for many CTE/Work Experience Educators/Workability Educators and Work Permit Issuers, to have a VOICE, in the process. Especially when we were in SACRAMENTO at our Conference!!!

5. I inquired to speak and attend the Public Comment session for the State Plan, during the CTE Conference in November., and was told I needed to pay the registration fee in order to do so. (Though I was a break-out session speaker at the very same CTE Conference). Session: Child Labor Laws and Work Permits for minors.

6. As a CTE/Designated Subjects credentialed Coordinator, I had emailed CDE Pradeep Kotamraju, requesting a brief meeting while I was presenting at the above CTE conference in November, 2019 (Rancho Mirage) It is documented the email was opened and read, within "minutes" of me sending the email, but he chose not to give a "courtesy" response. Below is my email to him:

7.. Work Experience Education programs: (Exploratory—EWEE, General-GWEE, Career Technical-CTWEE), is and has been a Vocational program since the early 1960's in CA. (CAWEE was created in 1965, BEFORE CAROCP), Many of the ROP's, early-on, used our Training Agreements, Individual Training plans, Evaluation forms, our curriculum and frameworks, as their model. Now, they continually inquire for more of our contacts and other things to add to their programs. But REFUSE to include us as "bookends" for the career paths or be "any" part of their "career paths" as an option for students. Local example: I have students enrolled in EVERY program of WEE. but particularly "Exploratory" WEE (a non-paid Internship program) at Lockheed Martin.....and others businesses. Lockheed works with my local WEE program because our program gives them the flexibility needed for students and the company. Students are in the "Exploratory" WEE program. Exploring ALL areas and various departments at Lockheed. Not ALL are in Engineering. We find students don't want to be in a career path, but want the experience to explore occupations without the restrictions of being in a "career path".

8. CDE—CTE has not recognized WEE nor financially supported Work Experience Education prog



The Honorable Tony Thurmond  
California State Superintendent of Public Instruction  
1430 N Street  
Sacramento, CA 95814  
President Linda Darling-Hammond  
State Board of Education  
1430 N Street  
Sacramento, CA 95814

**Re: Comments on the Draft CA Strengthening Career & Technical Education for the 21st Century Act (Perkins V)**

On behalf of Project Lead The Way (PLTW), we appreciate the opportunity to comment on the draft California Strengthening Career and Technical Education for the 21st Century Act (Perkins V) State Plan. We are thankful for the work done by the California Workforce Pathways Joint Advisory Committee (CWPJAC) and are excited to continue to participate with the California Department of Education (CDE) in the approval of the Perkins V State Plan.

PLTW provides project-based, hands on science, technology, engineering, and mathematics (STEM) curriculum for PreK-12, as well as teacher professional development. PLTW curriculum is used in more than 1,500 schools throughout California with more than 5,500 PLTW-certified teachers. PLTW courses are structured to ensure that students access real-world, applied learning experiences that empower them to gain the skills they need to thrive in college, career, and beyond. PLTW's pathways in computer science, engineering, and biomedical science provide hands-on learning opportunities using a research-supported approach. PLTW programs in California have forged strong relationships with school districts throughout California as well as meaningful industry partnerships with the business community, which also has a real interest in ensuring a strong pipeline of well-prepared future workforce participants.

**Employability Skills**

PLTW applauds the State's vision for CTE programs and its recognition that skills such as "communication, critical thinking, problem solving and teamwork" are "essential prerequisites for work" (pg. 15). PLTW students engage in hands-on activities, projects, and problems that are reflective of real-world challenges. This compelling, real-world



approach empowers students to learn essential, in-demand skills validated by the world's leading companies, while also providing an invaluable connection between what students are learning in the classroom today and how it applies to the paths they'll take in the future. California's Standards for Career Ready Practice contain many of the skills PLTW students obtain through challenging coursework and measured through PLTW's innovative assessments such as ethics, teamwork, technology skills, problem solving skills, and critical thinking.

### **Elementary & Middle Grades**

PLTW appreciates the efforts to include Elementary and Middle grades into the plan (pg. 17). It is important that students are exposed early and often to career awareness and exploration. The State Board of Education (SBE) and CWPJAC have previously emphasized the importance of integrating 7th and 8th grades into the CTE frameworks; however the Perkins V plan does not articulate how far down in grade levels Perkins funding can be used or how those dollars can be accessed in lower grades. The Perkins V authorization allows for funding to be used for students as early as 5th grade to ensure students are exposed to career opportunities early in their education. *PLTW asks that the Perkins V plan include language that specifically allows for schools to utilize funding for all middle grades as defined in Perkins V including 5th and 6th grade for articulated CTE career awareness and exploration and teacher development to support such offerings.*

### **CTE Programs**

The requirements of local educational agency (LEA) CTE Programs (pg. 53, 57) require that a career pathway must consist of not less than two full year courses, but then goes on to say that the pathway must include sufficient introductory, concentration and capstone courses. In application, this appears to mean that **each pathway MUST consist of three courses, one of each in the three categories** (introductory, concentration, capstone), rather than the two courses articulated in the Perkins V Plan. This can lead to problems for districts and schools when accessing funding and often results in less flexibility for developing pathways. *PLTW respectfully requests the SBE and CDE to clarify the requirements of a pathway and ensure that those requirements are reflected within the California Longitudinal Pupal Achievement Data System (CALPADS).*

Additionally, CTE courses must be taught by a teacher who meets the CTE teacher credential and occupational experience (pg. 52). "The lack of CTE credentialed teachers



in the state of California has been a growing concern” (pg. 117). While the plan acknowledges the challenge and points to working groups at the California Commission on Teacher Credentialing (CTC) (pg. 114, 117), *it is vital that the CTC and CDE prioritize modifying/updating the requirements to obtaining a CTE credential and create flexibility within credentialing pathways.* Without more credentialed CTE teachers, the Perkins V plan will have limited impact.

### **Industry Credentials**

Programs of Study (POS) are required to align with an industry recognized credential, while LEA CTE programs are required to “provide for certification of students who achieve industry- recognized skill and knowledge requirements” (pg. 54). The language does not clarify what “provide for certification” means; whether students must obtain an industry certification or rather obtain relevant technical knowledge and skills. We agree that CTE programs should lead to employment opportunities but given that for certain industries such certification may not be appropriate or attainable, PLTW does not believe that the attainment of industry credentials should be the only way to measure the completion of a CTE program of study. *PLTW suggests that CTE sequences of courses do not have to culminate in an industry credential, but that they meet the relevant technical knowledge and skills required by the industry.*

Thank you again for the opportunity to submit comments on the California’s Perkins V State Plan. PLTW looks forward to working with the CDE, SBE, CWPJAC, and the community of educators in California committed to empowering and preparing students for college and career opportunities beyond K–12. If you have any questions or want further clarification, please reach out to me at [egarner@pltw.org](mailto:egarner@pltw.org).

Sincerely,

Elly Garner  
Director of Government Relations, West Region  
Project Lead the Way  
CC: Governor Gavin Newsom

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## **State Recommended Action: Written Correspondence**

**California Dental Association:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the state level and in local implementation. As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V.

**Interwork Institute, San Diego State University:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

**California Teachers Association:** We appreciate the commenter's input and have made some of the corresponding changes to the Draft Perkins V State Plan where applicable. Some of the concerns raised in this letter are already included in the plan, and others go beyond the scope of this plan. Because elements of the CTA letter were included throughout the online feedback process, please see the State's response itemized in those areas.

**California Association of Work Experience Educators:** We appreciate the commenter's input and have clarified the wording under this section and in related sections, as necessary.

**Project Lead the Way:** While we appreciate the commenter's input, no changes have been made. The concerns raised in this comment relate to a more granular level of implementation. The intent of this comment requires a combination of policy changes at the state level and in local implementation. As such, we will defer this topic for future consideration during the development of the refined ground rules for implementation of Perkins V.