

SUMMARY PUBLIC INPUT

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

Posted by California Department of Education
January 2020 (Updated February 2020)

The California Department of Education (CDE) contracted WestEd to gather, organize, and analyze public input on the Draft Federal *Strengthening Career and Technical Education for the 21st Century Act (Perkins V) State Plan*. The information below describes the public comment process, a breakdown of the number of individual comments, the distribution of respondents' primary constituency, and samples of frequently mentioned issues. The purpose of this summary is to orient the California Workforce Pathways Joint Advisory Committee (CWPJAC) to the extensive feedback received and the diligence put forward by the staff of the CDE, State Board of Education (SBE), and California Community College Chancellor's Office (CCCCO) in reviewing the public feedback.

Overview of Public Comment Process

The public comment and review process included:

- Multiple email announcements of feedback opportunities via listservs of the CDE, SBE, and CCCCCO oriented toward those interested in career technical education (CTE) and/or Workforce Development
- Dedicated web page for online feedback available to the public for 33 days
- Four, two-hour, in-person public feedback sessions
- 361 different comments from 92 individual respondents (see details below)
- Joint management team (made up of staff from the CDE, SBE, and CCCCCO) worked in small teams to review and sort all comments
- During the review process teams identified how to respond to each comment, and when appropriate, how to incorporate the feedback directly into the draft
- As part of the review process described above, the State responded to each comment in one of the following four ways:
 - Included in the update of the Federal Perkins V Draft State Plan
 - Excluded because not under the scope of the Federal Application

- Deferred to the when the Federal Perkins V gets fully implemented
- Deferred to the California CTE State Plan to be developed during Fiscal Year 2021

Table 1. Number of Responses Across Sections of the Draft Plan (by prompt)

Prompts in the Perkins V State Plan	# of Responses
Plan Development and Consultation	32
Program Administration and Implementation (Vision, Programs of Study, Special Populations, Teacher Preparation)	189
Fiscal Responsibility	45
Accountability for Results	49
Assurances, Certifications, and Other Forms	N/A
Miscellaneous Online Feedback	27
Combined Verbal Comments from Public Sessions & Letters	19
Total of all comments across all formats and prompts	361

Table 2. Distribution of Respondents for the Online Public Input for Perkins V State Plan (Primary constituency indicated by respondents)

Type	Verbal & Letters	Online	Percentage
Kindergarten through grade 12 (K–12) Instructor (CTE)	1	17	20%
K–12 Administrator (CTE)	0	13	14%
Declined to state	1	8	10%
Postsecondary Administrator (CTE)	0	7	8%
Postsecondary Counselor or Career Staff	4	2	7%
K–12 Administrator (Non-CTE)	1	3	4%
Community-based organization	2	2	4%
Postsecondary Instructor (CTE)	1	2	3%
Postsecondary Administrator (Non-CTE)	2	1	3%
K–12 Instructor (Non-CTE)	0	2	2%
Students	0	2	2%
K–12 Counselor or Career Staff	1	0	1%
Other	6	14	22%
Total	19	73	100%

Table 3. Sample of Frequently Mentioned Issues

The table below includes a sample of salient topics in the public feedback that occurred frequently across the online feedback and during the public feedback sessions. These samples are not intended to be comprehensive, but rather to serve as a means to orient the CWPJAC members to the comments. The full compilation of feedback and State responses to individual comments can be downloaded via this soon-to-be established link: <http://www.wested.org/perkinsplanfeedback>.

Issues	General State Response
<p>Plan Development and Consultation</p> <ul style="list-style-type: none"> Classroom teachers were not adequately included in the stakeholder discussions 	<p>In response to public comment and feedback from members of the CWPJAC, the State hosted an online conversation on October 17, 2019, dedicated to collecting feedback and ideas from practicing teachers. See the Plan's appendix for the list of teachers who participated.</p>
<p>Teacher Preparation</p> <ul style="list-style-type: none"> Agreement that teachers need training in pedagogy in addition to industry experience; less agreement on how teachers should demonstrate both Multiple recommendations that administrators also receive professional development (PD) in CTE Multiple recommendations that all receive PD in working with students with disabilities 	<p>Some of these comments were directly incorporated into the Perkins V Draft. However, comments that related to a state policy issue or local control issue were deferred for future consideration either during implementation of the Perkins V State Plan or during the development of the California State CTE plan.</p>
<p>Meeting the Needs of Students with Disabilities</p> <ul style="list-style-type: none"> Multiple recommendations for the provision of appropriate accommodations and resources Encourage and support the work of teachers grounded in an integrated and competitive setting Differentiated curriculum that takes into account the needs of students with disabilities 	<p>Some of these comments were directly incorporated into the Perkins V Draft. However, comments that related to a state policy issue or local control issue were deferred for future consideration either during implementation of the Draft Federal Perkins V State Plan or during the development of the California State CTE plan.</p>
<p>Accountability Concerns</p> <ul style="list-style-type: none"> Difference in state and federal concentrator definitions Ensure alignment between California accountability model and the Perkins Accountability Indicators Questioned selection of dual enrollment as the secondary quality indicator instead of Work Based Learning Challenges with dual enrollment, including challenges for adult students 	<p>In response to public comment, feedback from members of the CWPJAC, and because of newly available data, the entire Accountability section was rewritten, including updating the State Determined Performance Level (SDPL) table.</p>

<p>Policy Issues</p> <ul style="list-style-type: none"> • Viability of Regional Occupational Centers and Programs • Intra- and inter-agency collaboration and efficacy, particularly needs regarding special populations, adult education, California Longitudinal Pupil Achievement Data System, and teacher preparation • Coordination with Workforce Innovation and Opportunity Act, Local Control Funding Formula / Local Control and Accountability Plans, Every Student Succeeds Act (ESSA), and Individuals with Disabilities Education Act. 	<p>Some of these comments were directly incorporated into the Perkins V Draft. However, comments that related to a state policy issue or local control issue were deferred for future consideration either during implementation of the Perkins V State Plan or during the development of the California State CTE plan.</p>
---	--

Responses to Individual Comments

The State responses to individuals are a little different from the general state responses shown in the above table. Depending on the specificity of the individual comment, the state response is one of the following:

- ***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.