



Feedback: Draft California Perkins V State Plan

Overview

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 working 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. 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 the [California Perkins V state plan](#).

For more information about the Linked Learning Alliance, visit www.linkedlearning.org. Please note that this feedback was developed in conjunction with the Alliance for Excellent Education.

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)

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, which is 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. It also does not take into account the transiency of many underserved students. Furthermore, it does not accurately display the success of CTE students who go through a two-course sequence but are not considered a completer. We agree that it is important for the data to be comparable for comparison groups.

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:

1. 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.”
2. Second, the law requires accountability only in the aggregate—at the ‘all student’ level, negating state determined performance levels for student groups.



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. 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.

Even though the CCI is set with a grade of C- or better, this does not support the importance of student achievement in student groups 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.

For example, in some districts the CCI is not reflective of our 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 us to work toward serving the whole student, using multiple resources across many divisions.

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)

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 student groups 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 is the completion of a course sequence vs. a test score. We agree that there should be consistency, but factors contributing to CTE pathway success is not a hard number or a benchmark.

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 groups, which includes closing performance gaps, the State and its eligible recipients can implement an improvement plan specifically for CTE concentrator student groups 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 group (based on annual performance data), the State or eligible recipient could implement an improvement plan for the student group(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 groups on the lagging indicator.

Note: The college credit is still controlled by the community college system. As an example, some community colleges do 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.



Recommendation 5

Recommendation: Leverage reserve funds to further strengthen system alignment.

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. For example, for a district, such as Antelope Valley Union High School district which covers 1200 square miles and some rural areas, but is not designated as rural, it would be beneficial.

Recommendation 6

Recommendation: Rethink the definition of a concentrator.

The definition of a concentrator, to the understanding of many of our district leaders, has not included the requirement that students have completed two courses in the past. In their experience, the introductory course (Level One) is a "nice-to-have" but not a "need-to-have."

Under the proposed definition, students would need to take a CTE course while many are working on completing A-G course requirements and engaging in credit recovery from 9th grade. Many more Linked Learning students are clear about the importance of CTE and have room in their schedules to take the courses at the 11th grade.

In reality, many Linked Learning district pathways start in 10th grade with CTE. In practice, not all students can access the CTE course at that level because of credit deficiency. Most California districts offer summer credit recovery for 11th and 12th graders.

We would like to see flexibility for our schools in the 10th grade whereby students could be counted as completers after taking two courses, not three.

The other reality is a serious dearth of CTE credentialed teachers. The requirement of three courses thus requires schools to have properly credentialed teachers across three grade levels. In practice, some California schools have had teachers without CTE credentials teach the introductory course and then teachers with the CTE credentials teach the levels 2-3 courses, where technical skills are at a higher level. For example, in OUSD, at Fremont High School, there is an "Architecture Academy" (CPA) that has an engineering and design "front door" (intro) taught by a teacher who actually does have ICT and AME (not engineering) credentials; the next two courses are construction courses taught by instructors with Building Trades and Construction credentials. In this case, OUSD has been able to provide Perkins funds to the instructors of construction courses only (not engineering). Under the new guidelines, this pathway would no longer be eligible for Perkins funding because the introductory course is not a construction course and is not taught by a construction teacher. We hold this pathway up as a model because of how well aligned to the CTE standards they are and because the design is so aligned with what industry wants (design + making).