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October 23, 2024

The Honorable Gavin Newsom
Governor, State of California
1021 O Street, Ninth Floor
Sacramento, CA 95814

RE: Recommendations for *California's Master Plan for Career Education* (Executive Order N-11-23)

Dear Governor Newsom,

On behalf of the Association of California School Administrators (ACSA) and our more than 18,000 education leaders statewide, we are responding to your July 2024 [Community Input and Considerations Report](#) (Report) related to the forthcoming *Master Plan for Career Education* (*Master Plan*). We applaud your office and the various state agencies that convened robust regional meetings throughout the state, demonstrating a commitment to engage all partners in the process. The Report is a thoughtful compilation of the feedback in a digestible format; however, we believe the Master Plan will need increased specificity to create actionable change. In addition, the Master Plan should integrate all of the recent efforts underway that have already been addressed in recently passed legislation or regulatory guidance, with an emphasis on streamlining these efforts, rather than adding new programs.

ACSA members are particularly keen to engage and strengthen career pathways and prioritize hands-on learning and real-life skills through the following recommendations:

1. Streamline current grant programs and funding streams;
2. Prioritize at-promise students at alternative schools;
3. Link adult education and other concurrent state initiatives regarding workforce development; and
4. Address career and technical education (CTE) and adult education teacher staffing and credentialing issues.

These four recommendations would strengthen California's career education and CTE offerings and increase coordination among state agencies and partners.

1. Streamline Current Grant Programs and Funding Streams

Local education agencies (LEAs) are currently operating CTE programs within a bifurcated system that operates with unique eligibility and reporting requirements involving multiple state agencies and partners. Our members lament that the administrative demands and unique requirements with each of the separate systems under the K12 Strong Workforce Program, the Career Technical Education Incentive Grant, and the new Golden State Pathways award, among others, create unnecessary work at the local level and shifts focus away from the core function of delivering high-

quality CTE programs. Unfortunately, these grant structures also exclude Adult Education sites that offer low or no-cost short-term CTE training and licensure to hundreds of thousands of adults, that lead to a career in a year or less and instead focus on K12 and community colleges.

Committing to a multi-year, unified process from the State that eliminates the need to “blend and braid” multiple funding opportunities will ensure that efforts at the local level are focused on thoughtful, strategic implementation and student success. Multiple systems also create multiple inequities for smaller LEAs: 1. Small LEAs lack the personnel to run multiple grants, and 2. Some LEAs are accessing millions of dollars while others receive zero. Furthermore, the funding formula, cost of living adjustment, and match amounts for existing state CTE programs also need to be recalibrated to ensure funds are maximized at the local level.

Lastly, in revising the system, we advise against competitive structures for LEAs and regions, and data metrics/outcomes that do not put students first. (For example, some students want courses that lead to immediate, entry level employment, but a program may require students to take higher level courses in order to complete a program.) To be truly *student centered* in all aspects, we must have multiple on-ramps to showcase student success and ensure that all partners are seeking to maximize students’ exposure and realization of all workforce opportunities.

2. Prioritize At-Promise Students at Alternative Schools

At-promise students in our alternative schools who may experience incarceration, probation, unstable housing, academic credit deficits, and other challenges are often transient, and would benefit greatly from CTE pathways as a direct line to employment after high school graduation or a steppingstone into a higher education program. Yet many of these students cannot participate in a full sequence pathway, nor meet completer requirements which bars them from exposure to rich CTE courses, pathways, and dual enrollment opportunities. As the state reframes the system, consideration should be given to at-promise youth, who are attending county-operated court and community schools, community day schools, continuation schools, and other alternative schools, and how funding and programs can be bolstered to meet their unique needs.

We also encourage the state to take a holistic approach when advancing curriculum and instruction initiatives. It is concerning that legislative efforts in recent sessions have added substantial new requirements without removing or revising the existing curriculum. Students already receive a broad liberal arts education that prepares them to pursue a variety of careers and life goals upon graduation. While well-intentioned, every additional required class removes the opportunity for students in alternative schools to pursue an elective, CTE course, or advanced learning in a field of interest.

3. Link Adult Education and Other Concurrent State Initiatives Regarding Workforce Development

The new *Master Plan* is an exciting opportunity to link all statewide efforts that can maximize workforce development. The role of adult education as a conduit to student success cannot be overstated. These programs are critical to ensuring rich programmatic opportunities and workforce exposure for at-promise youth (16 to 24 year-olds), and provide immigrant parents options to explore career pathways that lead to livable wages that can transform low-income households into middle-income households. The state should consider the recommendations highlighted in the

Legislative Analyst's Office [Redesigning California's Adult Education Funding Model](#) report, especially those addressing the bifurcated system, while considering holistic system change.

Coordination and alignment should also be sought with other state initiatives, involving internships, dual enrollment, and transitional kindergarten (TK) rollout, workforce development with the Employment Development Department (EDD), and the High Road Alliance that involve apprenticeships and pre-apprenticeships. Support and efforts need to also prioritize improved linkages between employers, TK-12 schools, adult education programs, higher education, and families.

4. Address CTE and Adult Education Teacher Staffing and Credentialing Issues

The Report's collective insights and feedback include concepts of access and affordability, career pathways, hands-on learning, work-based learning, apprenticeships, and employer partnerships for students. This is just as applicable to the educator workforce, but the Report stops short. Attracting CTE teachers, who often make a higher income in their respective industries, will continue to be an issue without innovative incentive opportunities and partnerships. It's also problematic for LEAs to recruit CTE teachers if they are unable to offer them Full Time Equivalency (FTE). As cited in the Commission on Teacher Credentialing's (CTC) [Report to the Legislature on Credentialing Related to Educators Assignment Monitoring Pursuant to Assembly Bill 1219](#), there are a number of misassignment issues related to CTE credential holders. For example, a CTE teacher can be the instructor on record for their given pathway, but are the only teachers deemed misassigned when teaching non-core elective courses such as Home Room, Student Government, Leadership, and Study Hall. School leaders need flexibility to adequately staff their schools and the inability to offer an FTE position and allow the CTE teacher to teach these courses add to staffing challenges.

California has recently affirmed the need for increased, seamless authorizations for multiple and single-subject teachers so that these teachers who already have additional subject matter expertise may be authorized to teach added subjects (Assembly Bill 2473, Committee on Education, 2024). The state should look for course equivalencies and seamless authorizations that might be applied to clear credentialed CTE teachers. For example, business and finance CTE teachers would be well-positioned to teach the new personal finance graduation course requirement under Assembly Bill 2927 (McCarty, 2024), especially because many personal finance courses are currently taught by CTE teachers who will be unable to teach these courses moving forward under the existing structure. Credentialing hurdles and potential equivalencies need to be fully examined and unpacked.

As affirmed in the regional meetings and outlined in the Report, credentialing issues, unfortunately, also exist in Adult Education. Costs of obtaining a credential can be challenging when many Adult Education teachers are only hired on a part-time basis. Teachers for English as a Second Language (ESL) courses experience hurdles in clearing their credentials while simultaneously, programs around the state experience huge waitlists due to the high-interest level for ESL programs. One solution could be to allow Teaching English as a Second Language (TESL) holders, Teaching English to Speakers of Other Languages (TESOL), Teaching English as a Foreign Language (TEFL), and other similar certification holders with more than one year of teaching experience, the ability to get a clear credential without delay and costs with the stipulation that they are to teach only in ESL programs. This is an immediate fix that upholds the integrity of the programs since these

candidates have already successfully completed their TESL/TESOL/TEFL training, while also alleviating the duplicative hurdles for candidates seeking their ESL Adult Education Credential.

Again, we applaud your efforts to overhaul and reframe workforce education while seeking widespread engagement and interagency involvement. We are eager to serve as a resource to streamline efforts, prioritize students, and maximize students' career exploration and pathways that will help them uncover their potential. Please contact me at skaminski@acsa.org should you have any questions relating to this letter.

Sincerely,



Serette Kaminski
Legislative Advocate

CC: Honorable Members, California State Senate and California State Assembly
Michael Wiafe, Assistant Deputy Cabinet Secretary, Office of the Governor
Michael Drake, President, University of California
Sonya Christian, Chancellor, California Community Colleges
Kristen Soares, Association of Independent California Colleges and Universities
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