

CALIFORNIA ASSOCIATION OF REGIONAL OCCUPATIONAL  
CENTERS AND PROGRAMS



# The CAROCP Response to the Multiple Pathways to Student Success Report

Envisioning the New California High School



2010

The bottom of the page features a large, abstract graphic composed of several overlapping, semi-transparent geometric shapes. The shapes are primarily light blue and grey, creating a layered, architectural effect. The shapes are arranged in a way that suggests depth and movement, with some appearing to be in front of others. The overall aesthetic is modern and clean.



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California Association of  
Regional Occupational Centers and Programs

## **THE CAROCP RESPONSE TO THE MULTIPLE PATHWAYS TO STUDENT SUCCESS REPORT Envisioning the New California High School**

**A Report to the Legislature and Governor  
Pursuant to Chapter 681, Statutes of 2008**

**September 2010**

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The Multiple Pathways to Student Success feasibility study sets forth a bold agenda for high school reform through the implementation of career pathways and linked learning. Many of the recommendations resulting from the study directly involve Regional Occupational Centers and Programs (ROCPs), as they are the primary delivery system for secondary career and technical education in California. The study contains ten Policy Recommendations and identifies three proposed Agenda Items for Immediate Action for the 2010-2011 school year.

The California Association of Regional Occupational Centers and Programs (CAROCP) is responding specifically to Policy Recommendations 8, 9, and 10 and has prepared an alternative set of Agenda Items for Immediate Action that may be a better starting point for launching high school reform. The three Policy Recommendations that CAROCP is addressing are: (8) Modify the Mission, Structure, and Functions for Regional Occupational Centers and Programs, (9) Increase Work-Based Learning in Schools, and (10) Provide State Leadership that Strengthens the Multiple Pathways Approach.

The alternative Agenda for Immediate Action follows the responses to the Policy Recommendations.

1

Please note that all italicized statements are quoted directly from the Multiple Pathways to Student Success Report.

## POLICY RECOMMENDATION #8

### MODIFY THE MISSION, STRUCTURE, AND FUNCTIONS FOR REGIONAL OCCUPATIONAL CENTERS AND PROGRAMS

- (1) **Modify the ROCP mission, structure, and functions to provide statewide systemic support to increase school district capacity to offer career technical education and to support pathways using the multiple pathways approach.**

***Change the ROCP name to reflect a new mission, the Regional Career Preparation Authority (RCPA), and utilize existing ROCP funding to support the CTE system.***

CAROCP is open to a name change. Through strategic action planning, CAROCP membership has identified the need to have stronger name recognition and branding of ROCP. CAROCP would support a name change provided the word *regional* remains in the title. As stated in the Multiple Pathways report, “ROCPs locate programs strategically within districts to cost-effectively maximize student access to specialized facilities and equipment” (California Department of Education [CDE], 2010, p. 33). The report validates that one of the several advantages of the current ROCP delivery system is regional coordination. Finally, the ROCP delivery system was crafted in 1967 with a foundational mission of providing regional access to Career Technical Education (CTE), thereby increasing options and opportunities for students. This foundational concept of regional delivery is core to CAROCP and the ROCPs it represents.

With regard to funding, the report identifies the ROCP delivery system as “cost-effective.” One of the four core components of the Multiple Pathways approach to high school reform deals with work-based learning. The report states, “The majority of work-based learning opportunities are provided through 74 ROCPs serving every California school district” (CDE, 2010, p. 47). The report also states “ROCPs have their own state funding and funding requirements, which assures some support for the CTE element” (CDE, 2010, p. 36). Many ROCPs are already partners in the implementation of career pathways, career academies, smaller learning communities, and multiple pathways. “Some of the costs are already borne through funding to ROCPs that expand the school day for students in pathways and for alternative education and other programs dedicated to supporting student engagement and success” (CDE, 2010, p.192). Understanding that the current economic climate has forced reductions in access to CTE and ROCP courses, the research and findings presented in the *Multiple Pathways to Student Success Report* do not support the recommendation to change the ROCP funding system. The

report also cites that “little information is available about the resources required to start and operate pathways” (CDE, 2010, p. 178). It appears this recommendation is not aligned with the research and findings in the *Multiple Pathways to Student Success Report*, and therefore, CAROCP would like to review research and data that supports restructuring of the ROCP funding model.

***Consolidate the number of RCPAs serving regions or counties.***

A careful review of the report gives no indication of a need to consolidate the number of ROCPs serving regions or counties. Repeatedly throughout the report ROCPs are commended for how well they support and enhance the efficacy of multiple pathways.

Some ROCP regions are referenced specifically with the question raised as to whether or not the region needs the number of ROCPs they currently have. There is no answer pro or con to this question as no evidence supporting either has been presented. Current ROCP structures are the result of local education agency decisions to best meet the needs of their students and their unique communities by offering programs and services on campuses and at regional occupational centers.

The ROCP community is very open and willing to explore and implement policies that will serve to improve an already effective delivery model. That said, any change to the structure of ROCPs must be grounded in sound, data-based evidence clearly indicating the change recommended will improve delivery and services provided by the ROCPs to all students.

***Provide RCPA governance through a board consisting of the county superintendents and representatives from each school district within the service area appointed by each school district board of education. If a single school district qualifies as a region, the district school board would serve as the governing body.***

A major strength of ROCPs throughout the state is the various governance structures that have been adopted by local educational stakeholders to meet their unique student, community, and workforce development needs.

CAROCP believes that the present three governance structures, county–operated, joint powers authority, and single district, now support flexibility at the local level. CAROCP does not support changing any governance structure without significant further study. If there is compelling evidence of a more effective, open, and inclusive structure, CAROCP is willing to investigate alternative governance models. School districts and ROCPs have a proven structure to design and direct CTE programs and services since the optimal structure and format is uniquely dependent on the local organizations, leadership, and geography.

***Designate the corresponding county office of education, joint powers authority agency, or single school district to serve as the local educational agency for fiscal and administrative purposes receiving RCPA funds directly from the state.***

CAROCP supports this policy recommendation as applied to the current governance structure. This appears to be in alignment with SB 1197 (Alquist, 2008, direct funding). CAROCP recommends a thorough study and supporting data to identify the specific problem or issues being addressed by this recommendation. There must also be clear articulation with respect to how implementation of this recommendation addresses the issues identified. This proposed item has the strong potential for creating an adversarial environment among key stakeholders.

***Limit RCPAs to 5 percent administration, 10 percent capacity building, and 85 percent for CTE pathways and courses.***

To set arbitrary limits on expenditures for any educational agency removes local control from the governing authority. California voters agree that a cap on administrative costs is a bad idea by defeating Proposition 223 that would have imposed a five percent cap on school district administrative costs. RCPAs do not have multilayered bureaucracies. The majority of funding goes directly to instruction and student support. RCPAs are a cost-effective delivery system, as reported by the California Department of Education. Existing RCPA governance structures demonstrate effective local control and collaboration with partnering districts to ensure funding is used to support quality programs and instructional staff.

***Provide school districts from 50 to 90 percent funding for each approved CTE course from the RCPA, with the school district providing the matching funding necessary to operate the course. Funding allocations would be made to participating districts in a way that ensures substantially equitable distribution of funds.***

Overall, RCPAs are funding a large percentage of CTE programs currently offered in local districts; and districts are not required to provide matching funds to operate a RCPA/CTE course. CAROCP believes that this recommendation is unnecessary and that requiring districts to provide matching funds could potentially harm collaborative partnerships and create additional administrative costs. Currently, RCPAs' governance structures ensure equitable representation for appropriate distribution of funding.

***Require school districts upon the establishment of a course, and biennially thereafter, to demonstrate to the RCPA that there is a current or future labor demand for the pathway, each CTE course is part of a viable CTE pathway, there***

***is no unnecessary duplication of the program within the region, there is articulation with postsecondary institutions, and the course meets established administrative and performance standards.***

CAROCP supports this recommendation because it validates the essential elements of an effective, high-quality CTE program. These elements are an inherent part of the ROCPs in California; some are mandated by law. Before a course is offered by the ROCP, there must be a demonstrated labor market need. Research is conducted to determine a labor demand and annual industry advisory committees are convened to validate the data. Additionally, California Education Code 52302.3 stipulates that every two years ROP governing bodies ensure that courses offered meet a documented labor market demand.

California Education Code 52302 requires that each ROCP consult with partnering school districts and community college districts and develop a plan to ensure that the career technical education needs of students in the region are being met. The plan ensures that at least 90 percent of all state-funded courses offered by the ROCP, in occupational areas in which both the program/center and the community college offer instruction, are part of course sequences and viable CTE pathways. Where appropriate, these sequenced courses are linked to licensure, certificate, and degree programs in the pathway and are articulated with the community colleges. This process ensures there is no unnecessary duplication of the program within the region. The courses in the pathways are based on the California CTE Standards and many meet the UC/CSU a-g admission requirements.

***Require the RCPA to have a representative from business/labor committee to advise the governing board of labor market needs and the curriculum offered across the region. Each district pathway would also be required to have a local business and labor advisory committee to assist the high school in implementing rigorous and relevant CTE courses and pathways.***

As the Multiple Pathway Report states in Chapter 9, “California Education Code Section 52302.2 requires each ROCP governing board to establish and maintain an advisory board for each pathway within an industry sector for which the ROCP offers courses” (CDE, 2010, p.121).

ROCPs have a long history of successful collaboration with business and labor through advisory committees. ROCPs work closely with business and labor to ensure CTE courses and pathways are meeting labor market demands, the curriculum is rigorous and relevant, and high schools are preparing students for college and careers.

It is through ROCP’s strong partnership with industry that thousands of high school students have the unique and powerful experience of applying their classroom skills through work-based learning opportunities. Students exit these experiences with an understanding of 21<sup>st</sup> Century skills; group dynamics; team and individual decision making; conflict resolution; and the professional, ethical, and legal behaviors associated with industry standards.

***Provide professional development and instructional resources through the RCPA to member school districts and coordinate all related business, accountability, and program support functions related to pathways and CTE.***

ROCPs are a source of CTE-related professional development for administrators, teachers, counselors, and other interested parties. Districts depend on ROCPs to provide leadership for professional development and to assist in leveraging instructional resources for CTE pathways. ROCP administrators and staff have the benefit of being very focused on CTE and on trends, innovations, legislation, requirements, etc. Many district administrators responsible for CTE programs are often not able to focus on that one area full time. ROCPs already provide this service or may be a significant partner in their local Perkins-funded consortia addressing this need.

ROCPs coordinate business and program support functions related to pathways and CTE courses in a cost-effective manner. Until such time as ROCP and CTE courses are included in the official accountability system, it will be difficult to assume responsibility for that function. Real costs to an ROCP to provide these services must be determined prior to an administrative funding limit being imposed.

**(2) Distribute federal Carl D. Perkins (Career and Technical Education Improvement Act of 2006) funding through the RCPAs.**

The 2008-2012 California State Plan for Career Technical Education, approved in March 2008 by both the State Board of Education and the Board of Governors of the California Community Colleges, established the vision, goals, and essential elements of a world-class career technical education system for California. The Carl D. Perkins Career and Technical Education Improvement Act of 2006 (Perkins IV), provides approximately \$140 million in federal funding to California for the purpose of improving CTE. California's plan is a collaboration between the California Department of Education (CDE) and the California Community College Chancellor's Office (CCCCO) and satisfies the federal requirement to submit a state plan to gain eligibility for federal Perkins IV funds.

Currently, ROCPs are eligible to receive Section 132 funds (for adults), and school districts are eligible to receive Section 131 (for high schools) funds which are distributed by the CDE. As a result of strong local collaboration and decision making to effectively meet the needs of students, many ROCPs are included in district CTE Perkins plans and are potentially supported with Section 131 funds that are distributed to the districts. The recommendation to distribute Perkins funding through the proposed RCPA could potentially strain relationships among stakeholders.

6

The recommendations presented below will require further review of new conditions including any potential changes. A shift to the RCPA structure is not recommended.

***Define RCPAs as meeting the conditions of a consortium under the Perkins Act.***

Current Perkins IV consortia requirements include submitting memorandums of understanding (MOUs), acknowledgement of the performance measures, and fiscal agent responsibility.

***Require each RCPA to develop a regional plan guiding the expenditure of Perkins funding within the region.***

Currently, ROCPs eligible for Perkins IV funding submit a regional plan describing the expenditure of the funds.

***Require the RCPA to prepare and submit annual applications, data, accountability, and fiscal reports to the CDE.***

Currently, ROCPs eligible for a Perkins IV funding submit annual applications, data, accountability, and fiscal reports to the CDE.

**(3) Distribute other state and federal career technical education funding through the RCPA system, and provide the associated oversight and support necessary.**

The recommendation presented will require further review; CAROCP would like to review the list of other state and federal career technical education funding referenced in this recommendation. CAROCP is supportive of the coordination of regional activities and recognizes the value of local control and of being responsive to local conditions, labor markets, and educational initiatives.

***POLICY RECOMMENDATION #9***  
***INCREASE WORK-BASED LEARNING IN SCHOOLS***

***Expand and sharpen the definition of work-based learning to allow for and encourage innovative, equitable, and pedagogically sound work-based learning activities for students and faculty.***

Work-based learning is a structured learning activity that integrates worksite experiences with academic learning. Every work-based learning activity has a clear purpose and structure focused on integrating classroom learning and the world of work. Work-based learning uses the workplace as a resource to provide students an opportunity to interact with adult workers, observe and ask questions about careers, do hands-on activities, reflect on their interests, set career goals and develop the skills and knowledge needed for a productive future (State Center Consortium, Fresno, CA 2001).

ROCPs provide the majority of these work-based learning opportunities for CTE students through recognized methodologies known as Community Classroom (CC) and Cooperative Vocational Education (CVE). ROCPs, with their mandatory advisory committees and employer linkages, are the proven model for successful work-based learning activities.

CAROCP takes issue with the suggestion in Chapter 4 of the Multiple Pathways report that work-based learning activities are “new”, but does agree that offerings should be expanded to serve students in grades 9-12 inclusively (CDE, 2010, p.43).

***Redefine the existing work experience function within high school and the role of the work experience teacher to coordinate work-based learning activities and local school-business engagement.***

Work-based learning under the ROCP delivery system includes the placement of students in paid and non-paid workplace experiences under supervision of CTE-credentialed teachers. These teachers who have industry experience often have pre-existing relationships with employers or dedicate the time and expertise required to build and nurture employer relationships. Coordinating and supervising students are integral aspects of the ROCP teacher’s responsibilities, with paid time allotted for these tasks. Each student has an individual training plan, and instruction in the workplace is tied back to specific competencies learned in the classroom. These paid or unpaid internship experiences enrich and expand classroom learning, showing students how their learning is applied in the world outside school, and offering access to tools, equipment facilities and expertise generally not available at school. (Darche, Nayer, & Bracco, 2009). General Work Experience Education (WEE) has an instructional

component but may be less specific to a CTE pathway and more generic in nature. Many students come to the program with their existing jobs and they have no connection to any specific coursework during their school day. The weekly instruction provided by the WEE teacher becomes more focused on general work habits and attitudes that are transferable across a variety of employment situations (California Work Experience Education Guide, 2005).

In recent years, some districts have reduced or eliminated their general work experience programs, which would greatly compromise the implementation of this recommendation. While general work experience is important for providing basic workplace skills the state plan for CTE calls for “more readily available vocational work experience that would provide meaningful expansion of learning for students in CTE programs.”

ROCPs offer an economical way to expand services to the greatest number of students without the need to invest in a new start-up program. CAROCP is open to increased ROCP capacity to expand work-based learning opportunities for all students.

***Provide statewide models of how work-based learning embedded in both CTE and academic classes can help schools address the four components of pathways.***

ROCPs are the statewide model for providing relevance through work-based learning and can help schools address the four core components of Multiple Pathways. Many examples of how work-based learning activities have supported the integration of core curriculum through problem and project-based instruction, using real world context and relevance, exist in ROCPs throughout the state.

ROCP courses which include paid and unpaid workplace learning are standards-based and aligned with appropriate core academic standards. These courses include challenging, engaging, student-centered instruction that connect students to school. An array of work-based learning opportunities that move from mentoring to real, hands-on activities with employers are offered by the ROCPs.

Support services provided by ROCPs enhance other, more traditional support services found at the secondary level. Many ROCPs provide counselors, career technicians, specialists or other staff who provide career guidance services, career assessment, recruitment, placement and/or outreach services. Many ROCPs provide connecting services including referrals and career awareness activities and assist students with career and college readiness resources.

***Collect and track data on work-based learning through the state’s CALPADS system.***

CAROCP supports this recommendation provided that ROCPs are included in the CALPADS system (other than through the data submitted by individual districts). Until that time, it will be difficult to implement any uniform data collection on a statewide basis.

Currently, data are not systematically captured on work-based or workplace learning, and it is difficult to ascertain the degree to which it is used as a methodology. To that end, many ROCPs across the state have joined in the CalPASS program in order to allow for cohort groups of students to be tracked into postsecondary attendance and, with the California Employment Development Department's participation, eventually into employment.

***Provide school districts with guidance regarding insurance and labor law requirements when placing students in off-site, work-based learning locations.***

CAROCP is in a position to provide school districts with guidance regarding insurance and labor law requirements when placing students in off-site, work-based learning locations. With more than 40 years' experience, ROCPs are the experts in providing work-based learning to students.

As the integration of programs increases, the distinctions among those based in high schools, in ROCPs, and in the workplace are operationally less clear than they have been in the past, though they retain distinct meanings in the California Education Code and Labor Codes. (Darche, Nayar, & Bracco, 2009).

During the School-to-Career era in California, there was dissemination of information from the federal government regarding the Fair Labor Standards Act (FLSA) that protects the rights, safety, and well being of young workers. The WestEd Work-Based Learning report states "Also highly important is the need to standardize, document, or otherwise institutionalize educational practices across the state to endure consistent quality, as the Regional Occupational Centers and Programs have done with a statewide handbook" (Darche, Nayar, & Bracco, 2009).

## POLICY RECOMMENDATION #10

### PROVIDE STATE LEADERSHIP THAT STRENGTHENS THE MULTIPLE PATHWAYS APPROACH

CAROCP recognizes the concept of multiple pathways as one of many models for the effective delivery of CTE. Since, as stated repeatedly in the *Multiple Pathways for Student Success* document, ROCPs play an important role in and may enhance the efficacy of the multiple pathway process, it is essential that CAROCP be represented as a member of advisory boards, policy recommending groups, and decision making bodies with respect to multiple pathways.

***Create a statewide Multiple Pathways Advisory Board of leaders from the education, business, and civic communities, appointed by and reporting directly to the SSPI, to provide the SSPI with ongoing guidance to expand pathway programs in California's public schools.***

CAROCP supports this recommendation with the mandated inclusion of a representative from CAROCP to represent the ROCP viewpoint.

***Provide administrative funding to the CDE to provide policy implementation, state and regional coordination, resource development, and accountability oversight for the expansion of pathways and high school redesign efforts.***

CAROCP supports CDE leadership and offers the services of its members to assist CDE staff in these efforts. It is also essential that ROCP leadership be consulted on a regular basis as decisions are considered and policy recommendations are developed to provide the perspective of CTE practitioners in the field.

***Incorporate effective pathway strategies into state policies and strategies for turning around the state's persistently lowest achieving high schools.***

CAROCP supports this recommendation provided that the multiple pathway approach is not promoted as the only strategy.

***Recognize in state policy the role and benefits of educational foundations, intermediary organizations, and coalitions in supporting the multiple pathways approach and systemic reform initiatives.***

CAROCP agrees and sees itself as one of these key organizations.

***Establish a statewide research agenda that incorporates input from key stakeholders to evaluate the effectiveness of the multiple pathways approach in preparing students for college and career.***

CAROCP welcomes and supports the collection and use of quality data to assess the effectiveness of any program including ROCPs.

***Design high-quality research studies that include longitudinal student-level and cohort designs to measure the effectiveness of pathway programs on improving student achievement.***

CAROCP supports this recommendation as an integral partner in multiple pathways.

## **CAROCP PROPOSED 2010-2011 AGENDA FOR IMMEDIATE ACTION**

The key to the success of this or any reform is the building of the foundation that will be completed in the first few years of the process. The first year priorities for immediate action are critical in the implementation of this far-reaching report; therefore, CAROCP proposes the following agenda for immediate action:

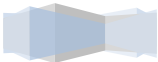
### **CAROCP Action 1: Implement a Unified Vision and Plan for California High Schools- Include All Stakeholders**

As the Multiple Pathways report states, “California is at a critical crossroads in terms of the challenges it faces in reforming its public high school system” (CDE, 2010, p. v). Furthermore, the report states, “If the multiple pathways approach is to become a key strategy for improving secondary education, then various state-level participants must come together to work in a coordinated and consistent manner to support the effort” (CDE, 2010, p.174). The report also includes a wide range of stakeholders, which should include ROCP, district, and high school personnel, needed for the recommendations to be successful. Without engagement, understanding, and commitment of high school stakeholders at the site level, full implementation of this report will be difficult. Therefore, the following actions are recommended:

1. Provide local and regional forums where all key stakeholders can gather to learn about and discuss the findings of this report.
2. Provide a state forum where all key stakeholders are “signing on” to this reform.
3. Utilize these forums to expand the membership to the Multiple Pathways Advisory Board.
4. Develop an Advisory Board long-term strategic plan for implementation of the report including legislative action that mirrors and supports the implementation plan.
5. Share the Advisory Board strategic plan with all stakeholders and include accountability incentives, CTE and academic integration, model sites, and the process to become a pilot multiple pathway high school.

### **CAROCP Action 2: Expand the Current Education Accountability System to Fully Include CTE – We Value What We Measure**

The Multiple Pathways report emphasizes that the policy recommendations “set forth a bold vision for improving California’s high school system – a system of rigorous pathways that will prepare all students for postsecondary education and careers” (CDE, 2010, p.195). Currently, academic core subjects are part of our accountability system and CTE courses are not. Until California Association of Regional Occupational Centers and Programs



CTE, including ROCPs, is part of the accountability system, it will not be a valued partner in this reform effort. Therefore, the following actions are recommended:

1. Implement necessary actions to fully include CTE benchmarks in California's K-12 education accountability system – API, AYP and SARC. We value what we measure and what is accountable.
2. Implement necessary actions to mandate that all high school academic content frameworks include integration of measurable and tested CTE standards in their adoptions. Utilize the state-approved CTE curriculum framework as a model for alignment of CTE and academic standards.

### **CAROCP Action 3: Identify and Certify Model Multiple Pathway Sites – It Can Be Done**

As the Multiple Pathways report states, “Numerous examples already exist demonstrating that the components of a transformed pathways high school are feasible and effective” (CDE, 2010, p. 198). The identification and “certification” of model pathway high schools demonstrating the successful partnerships of high schools and ROCPs are essential to the process. Therefore, the following actions are recommended:

1. Establish criteria for identifying and “certifying” model multiple pathway high schools.
2. Establish incentive system for schools selected as model multiple pathways high schools including measurement in the state accountability system.
3. Develop criteria for Multiple Pathway Pilot Schools.
4. Develop list of “certified” local and regional model multiple pathways high schools and require visitation of one or more of these schools as a requisite to apply as a pilot program.
5. Implement necessary actions to reward schools selected as pilot schools including measurement in the state accountability system.

## Conclusion

Regarding Policy Recommendation number 8, CAROCP would support a name change provided the word *regional* remain in the title. This foundational concept of regional delivery is core to CAROCP and the ROCPs it represents. CAROCP would like to review research and data that supports restructuring of the ROCP funding model. Any change to the structure of ROCPs must be grounded in sound, data-based evidence clearly indicating the change recommended will improve delivery and services provided by the ROCPs to all students.

CAROCP believes that the present three governance structures, county–operated, joint powers authority, and single district, now support flexibility at the local level. CAROCP does not support changing any governance structure without significant further study.

CAROCP supports the designation of county offices of education, joint powers authority agency, and single school districts to serve as the LEA for fiscal and administrative purposes as applied to the current governance structure. This appears to be in alignment with SB 1197 (Alquist, 2008, direct funding). CAROCP recommends a thorough study and supporting data to identify the specific problem or issues being addressed by the recommendation to utilize the RCPA model.

To set arbitrary limits on expenditures for any educational agency removes local control from the governing authority. CAROCP believes that the recommendation to limit administrative expenditures to 5 percent is unnecessary and that requiring districts to provide matching funds could potentially harm collaborative partnerships and create additional administrative costs.

CAROCP supports the recommendation for school districts to adhere to high standards for operating CTE courses because it validates the essential elements of an effective, high quality CTE program. ROCPs have a long history of successful collaboration with business and labor through advisory committees. ROCPs are a source of CTE-related professional development for administrators, teachers, counselors, and other interested parties. ROCPs coordinate business and program support functions related to pathways and CTE courses in a cost-effective manner.

With regard to distributing federal Carl D. Perkins (Career and Technical Education Improvement Act of 2006) funding, currently ROCPs are eligible to receive Section 132 funds (adults), and school districts are eligible to receive Section 131 (high school) funds which are distributed by the CDE. This recommendation could potentially strain relationships among stakeholders.

Distributing other state and federal career technical education funding through the RCPA system will require further review of new conditions including any potential changes. A shift to the RCPA structure requires further review. CAROCP is supportive of the coordination of regional activities and recognizes the value of local control and of being responsive to local conditions, labor markets, and educational initiatives.

Regarding Policy Recommendation number 9, CAROCP is open to increased ROCP capacity to expand work-based learning opportunities for all students. ROCPs are the statewide model for providing relevance through work-based learning and can help schools address the four core components of Multiple Pathways. An array of work-based learning opportunities that move from mentoring to real, hands-on activities with employers are offered by the ROCPs.

Collecting and tracking data on work-based learning through CALPADS is very important. CAROCP supports this recommendation provided that ROCPs are included in the CALPADS system (other than through the data submitted by individual districts). Until that time, it will be difficult to implement any uniform data collection on a statewide basis.

CAROCP is in a position to provide school districts with guidance regarding insurance and labor law requirements when placing students in off-site, work-based learning locations.

Regarding Policy Recommendation number 10, CAROCP recognizes the concept of multiple pathways as one of many models for the effective delivery of CTE.

CAROCP supports the recommendation to create a statewide Multiple Pathways Advisory Board with the mandated inclusion of a representative from CAROCP to represent the ROCP viewpoint.

CAROCP supports CDE leadership and offers the services of its members to assist CDE staff in these efforts.

CAROCP supports the recommendation to incorporate effective pathway strategies into state policies and strategies provided that the multiple pathway approach is not promoted as the only strategy.

CAROCP agrees with the recommendation to recognize in state policy the role and benefits of educational foundations, intermediary organizations, and coalitions in supporting the multiple pathways approach and systemic reform initiatives and sees itself as one of these key organizations.

Further, CAROCP welcomes and supports the recommendation to establish a statewide research agenda that incorporates input from key stakeholders to evaluate the effectiveness of the multiple pathways approach in preparing students for college and career and use of quality data to assess the effectiveness of all programs, including ROCPs.

Finally, CAROCP supports the recommendation to design high-quality research studies that include longitudinal student-level and cohort designs to measure the effectiveness of pathway programs on improving student achievement as an integral partner in multiple pathways.

## REFERENCES

- Darche, Nayar, & Bracco (2009). *Work-Based Learning in California: Opportunities and Models for Expansion*. WestEd, San Francisco, CA: The James Irvine Foundation. (pgs. 12, 17, 20, 21, 23, and 25).
- O'Connell, Jack, State Superintendent of Public Instruction, California Department of Education (2010). *Multiple Pathways to Student Success: Envisioning the New California High School: A Report to the Legislature and Governor Pursuant to Chapter 681, Statutes of 2008* CDE, Sacramento, CA: (pgs. v, 33, 36, 43, 47, 121, 174, 178, 192, 195, and 198).
- State Center Consortium (2001). *Investing in the Future: A Work-Based Learning Handbook*, Fresno, CA. (p. 5).