



August 1, 2022

The Honorable Tony Thurmond
State Superintendent of Public Instruction
1430 N Street, Suite 5602
Sacramento, CA 95814

The Honorable Daisy Gonzales
Deputy Chancellor
California Community Colleges
1102 Q Street, 6th Floor
Sacramento, CA 95811

RE: CDE & Chancellor's Office Adult Education Program Coordination - CONCERNS

Dear Superintendent Thurmond & Deputy Chancellor Gonzales:

On behalf of the California Council for Adult Education (CCAE) and California Adult Education Administrators Association (CAEAA), we are writing to convey growing concerns regarding erosion of Adult Education Program coordination and collaboration between the two systems that is having a detrimental effect on the providers and system of adult education in California.

For over five years, K12 Adult Schools and community colleges have been part of local consortia under the California Adult Education Program (CAEP) as a condition for receiving state funding to provide education and training to adult learners in their communities. At the state level, the consortia model was designed to increase collaboration between the two systems, providing joint decision making between the Superintendent and Chancellor related to CAEP, and provide greater access to higher education and career pathways. There have been great strides in this work and despite inherent challenges of bringing together two separate and distinct statewide systems, each with their own policies and processes, adult learners have benefited. However, there are obstacles that have emerged and are persisting resulting in erosion of the coordination and collaboration that was intended.

First, we are highly concerned with the latest decision-making process for important data metrics. More specifically, unilateral decisions by the Chancellor's Office regarding data metrics are not following or aligned to the "Measuring our Success" document (<https://caladulthood.org/DownloadFile/223>). This is highly problematic given the pivotal and foundational importance of the metrics for CAEP. This document was developed with input from community college non-credit programs, K-12 Adult Education programs, data contractors from both the Chancellor's Office (CO) and California Department of Education (CDE) and CAEP office staff from both the CO and CDE. Such unilateral decisions have included:

1. During the move to online instruction during the COVID-19 pandemic, the decision was made to count any student with 1 or more hours of instruction as a participant. This is not aligned to the data dictionary which requires a participant to be a student with 12+ hours of instruction and has created inflated, inaccurate numbers. As we understand it, this was a unilateral decision made by the CO to address attendance and persistence challenges with the community colleges' enrollment, specifically, upending the integrity of the data.
2. Use of course completion as a metric for Immigrant Integration which is contrary to the agreed to Immigrant Integration metrics outlined in the recommendations document (<https://caladulthood.org/DownloadFile/925>) developed by a workgroup comprised of community college non-credit program administrators, K-12 Adult Education program administrators, community-based organizations, and state staff from the CO, CDE, and the Governor's Office.
3. Lack of alignment between WIOA and CAEP metrics per education code. This causes confusion in the field as program staff are unclear how the metrics in LaunchBoard are developed and pulled from the data system.

Also of note, data provided by LaunchBoard, which is populated into the NOVA system, is always a year old. This is problematic as consortia are left to rely upon old data to write forward looking consortia goals and objectives.

In terms of contracting, the CO and CDE have historically and per statute made a joint decision on which vendors to contract with for various CAEP needs. Unfortunately, contract approvals for vendors which support the adult education field with technical assistance, professional development, and data are taking far longer than normal and are being scrutinized beyond reason due to a lack of knowledge by new CO program staff. Consequently, data systems are outdated, the field isn't receiving the level of technical assistance and guidance it needs and is entitled to, and more. Further, funding provided via the budget process each year to support such contracts and needs remains unspent and is carried over from year to year in large part. This is unacceptable.

It has also been brought to our attention recently that the CO is contemplating using CAEP funding to contract with a Technical Assistance provider for only the community colleges. Notably, the current Technical Assistance Provider (TAP) has been providing technical assistance, professional development including a CAEP Consortia Leaders event and the annual CAEP Summit, website development and maintenance, and is the first stop for questions from all CAEP consortia and agencies across the state. Leadership at the CO shared this idea with the current CDE administrator who cautioned that this would create a bifurcated system and is not in the spirit of the CAEP Education Code provisions, much less compliant with joint decision making regarding all aspects of, including funding for, CAEP. Furthermore, the Chancellor's Adult Education Office has unilaterally decided to end the provision of Professional Learning Communities and to reduce the provision of Targeted Technical Assistance service by TAP. Both of those strategies have been highly effective in supporting the field. The decision to erode the capacity of TAP by refusing to honor provider contracts and by eliminating critical strategies needed by the field is eroding the effectiveness

of TAP to support the field and is viewed as an attempt to undermine the entire consortia structure in California's Adult Education Program. It is egregious.

Finally, also related to technical assistance, the CDE has provided several ideas and suggestions for the ongoing \$1 million in Technical Assistance funding that was provided in the budget but has not been spent with a request that a small portion be transferred to the CDE using the mechanism set forth in 2021-22 budget language (SB 129).

With tensions mounting at the local level amid increasing costs, minimal new investment in the CAEP program relative to the needs, consortia governance challenges and tension, and growing carryover in the system, it is imperative that the systems at the state level model the coordination and collaboration that was intended with the establishment of CAEP. Absent such modeling and coordinated leadership, we remain highly concerned about the health and stability of the Adult Education system statewide. In a recent meeting between CCAE/CAEAA leadership and CO Adult Education leadership a statement was made that the CO has "primacy of funding" with the implication that the CO maintains primary decision-making authority. Such an interpretation is a false narrative, particularly given Education Code's explicit directive that decisions related to CAEP – including funding – all be joint decisions made by the CO and the CDE/Superintendent. In this regard, we urge you to take a stronger leadership role as executives for the two systems at the state level and require improved coordination, collaboration, and transparency between your staff who work with CAEP.

We appreciate your consideration of these growing concerns and look forward to your response. We would welcome the opportunity to schedule time with you both, jointly, to further discuss these concerns, steps to address them, and how the two systems move forward in the best interest of the students we serve. In the meantime, if you have any questions, please contact Dawn Koepke with McHugh Koepke & Associates at dkoepke@mchughgr.com or (916) 606-5309. Thank you.

Sincerely,



Sonya Ramirez
President
CCAЕ



John Werner
President
CAEAA

Cc: Members, Assembly Education Committee
Members, Assembly Budget Subcommittee on Education
Members, Senate Education Committee
Members, Senate Budget Subcommittee on Education
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