

REPORT BY THE
AUDITOR GENERAL
OF CALIFORNIA

**CALIFORNIA NEEDS TO DO MORE
TO EVALUATE THE EFFECTIVENESS OF
VOCATIONAL EDUCATION PROGRAMS**

REPORT BY THE
OFFICE OF THE AUDITOR GENERAL

P-509

CALIFORNIA NEEDS TO DO MORE TO EVALUATE THE
EFFECTIVENESS OF VOCATIONAL EDUCATION PROGRAMS

MARCH 1987



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STATE OF CALIFORNIA
Office of the Auditor General

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March 12, 1987

P-509

Honorable Art Agnos, Chairman
Members, Joint Legislative
Audit Committee
State Capitol, Room 3151
Sacramento, California 95814

Dear Mr. Chairman and Members:

The Office of the Auditor General presents its report concerning the responsibilities of the State Department of Education and the Chancellor's Office of the California Community Colleges to ensure that vocational education programs are effective in training students for jobs that exist in the labor market.

Respectfully submitted,

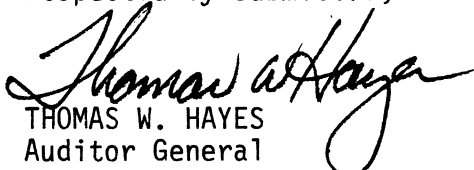

THOMAS W. HAYES
Auditor General

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SUMMARY

RESULTS IN BRIEF

Before approving new vocational education courses and programs, regional occupational programs (ROPs) and community college districts do not always survey labor markets, as required by state law. Furthermore, the governing boards do not always complete the evaluations of courses and programs, as required by law.

BACKGROUND

The State Department of Education (department) and the Chancellor's Office of the California Community Colleges (chancellor's office) are required by the Education Code to approve vocational education courses and programs at ROPs and community colleges. In addition, they are required to ensure that courses and programs are effective in training students for the existing labor markets.

PRINCIPAL FINDINGS

California Needs To Do More To Evaluate the Effectiveness of Vocational Education Programs

The department and the chancellor's office do not always require ROPs and community college districts to verify the demand for labor before approving new courses and programs nor do they require them to evaluate courses and programs to ensure they are effective. Furthermore, ROPs and community college districts do not always perform labor market studies, and they do not always evaluate courses and programs. At four ROPs and four community college districts, we reviewed 84 courses and programs. Staff of the ROPs verified the demand for 14 courses while staff at the community college districts verified the demand for only 3

programs. However, for 43 courses at the ROPs and 3 programs at the community colleges, staff had not verified the demand for labor. Only one of the ROPs we reviewed, the San Diego County ROP, has established standards by which to evaluate the effectiveness of its programs and has evaluated its programs as required by the Education Code. None of the community college districts we reviewed had done so.

Although the department and the chancellor's office have performed some reviews of ROPs and community college districts, they have not enforced the requirements that governing boards evaluate the effectiveness of vocational education programs. For example, since fiscal year 1981-82, the department has reviewed 48 of the 68 ROPs. Of the 48 reviewed, the department found that the governing boards of 17 had not performed evaluations of any vocational occupation programs and that the boards of 25 had not established standards for measuring the effectiveness of programs. In addition, the department did not require the 17 boards that did not perform evaluations to do so. Furthermore, the chancellor's office has conducted reviews of all 70 community college districts but could not provide documentation that it had taken action as a result of the reviews.

RECOMMENDATIONS

The department and the chancellor's office should require ROPs and community college districts to study the labor markets for proposed new courses and programs. They should also require the governing boards of ROPs and community college districts to evaluate the effectiveness of their vocational education programs every two years and should verify that reviews have been completed.

The governing boards of ROPs and community college districts should evaluate their programs every two years to ensure that they meet the documented labor market demand, that students are successful in completing the programs and finding jobs, and that the programs meet all standards established by the boards. The boards should also establish

standards for measuring the success of students in completing the programs and finding jobs, and they should terminate ineffective programs within one year, as required by the Education Code.

AGENCY COMMENTS

State Department of Education

The department concurs with our report and has begun to carry out the recommendations.

Chancellor's Office of the California Community Colleges

The chancellor's office generally concurs with the findings and recommendations in our report. However, the chancellor's office states that, due to staffing shortages, it is not now in a position to fully implement our recommendations.

INTRODUCTION

The State Department of Education (department), under the direction of the State Board of Education and the Superintendent of Public Instruction, administers public education for students from kindergarten through grade 12. The department develops policies and establishes regulations, assists local education agencies in curriculum and management, distributes funds appropriated by the state and federal governments for educational programs, and assesses the quality of educational programs of the 58 county offices of education and 1,029 school districts.

The Board of Governors of the California Community Colleges govern the public community college segment of the State's higher education system. The Chancellor's Office of the California Community Colleges (chancellor's office) carries out policies established by the board for the 70 community college districts and the 106 community colleges. The department and the chancellor's office are responsible for approving and reviewing vocational education courses and programs taught in the State's 68 regional occupational programs (ROPs) and regional occupation centers and 106 community colleges.

ROPs and regional occupation centers provide students enrolled in the State's school districts with technical training in the occupational skills needed for entry level jobs. ROPs and regional occupation centers also provide training to upgrade the existing skills

of students, and they provide working students with retraining for new occupational fields. Community colleges provide vocational education in courses and programs offering degrees, certificates, and licenses.

In fiscal year 1986-87, California will spend more than \$15 billion in state and local funds for education programs for more than 4.6 million students in kindergarten through grade 12. The State has included \$206 million in state funding for the ROPs and for regional occupation centers. In addition, the State will spend more than \$1.8 billion of state and local funds for programs serving 1.2 million students at community colleges throughout California.

SCOPE AND METHODOLOGY

The purpose of this report was to determine whether the department and the chancellor's office require ROPs and community college districts to comply with requirements for approving and evaluating vocational education courses and programs.

We reviewed the responsibilities of the department and the chancellor's office for approving and monitoring vocational education programs at regional occupational programs and at community college districts. We also reviewed the responsibilities of regional occupational programs and community college districts for ensuring that markets exist for the skills taught in new vocational education courses and programs and for evaluating their courses and programs to ensure that labor markets continue to exist for students they train.

To determine the responsibilities of the department and the chancellor's office, we reviewed the Education Code and the Administrative Code and we interviewed staff at those agencies. We also reviewed the policies of the department and the chancellor's office for approving courses and programs and for conducting reviews to determine if ROPs and community college districts conduct surveys of existing labor markets and periodically evaluate their courses and programs.

To determine whether governing boards of ROPs and community college districts conduct surveys of labor markets and evaluate their courses and programs, we visited four ROPs and four community college districts. We reviewed files of 84 of the 351 courses and programs approved for the districts after 1979, and we reviewed the applications for approval of those courses and programs submitted to the department and the chancellor's office by the ROPs and community college districts. We also reviewed available studies of labor markets, and we interviewed ROP and community college district staff to determine the extent of these studies. Finally, we interviewed ROP and community college district staff to determine if they set standards for student completion and employment, and we reviewed evaluations of courses and programs to determine if they use standards to measure the effectiveness of courses and programs.

CHAPTER I

CALIFORNIA NEEDS TO DO MORE TO EVALUATE THE EFFECTIVENESS OF VOCATIONAL EDUCATION PROGRAMS

The State Department of Education (department) and the Chancellor's Office of the California Community Colleges (chancellor's office) do not always request and review studies to ensure that labor markets exist for the skills taught in vocational education courses and programs that they approve. Furthermore, the department and the chancellor's office do not always monitor courses and programs as required by the Education Code to ensure that labor markets continue to exist. In addition, governing boards of regional occupational programs (ROPs) and community colleges do not always conduct studies of labor markets for vocational education courses and programs they establish, nor do they always evaluate them every two years as required by law. At the four ROPs and four community college districts we visited, the department and the chancellor's office approved the 84 courses and programs we reviewed. (See the Appendix for a list of the ROPs and community college districts we reviewed.) However, governing boards of those ROPs and community college districts had conducted studies of labor markets for only 17 of those courses and programs, and only one ROP has evaluated its programs to measure their effectiveness.

THE STATE DOES NOT REQUEST AND
REVIEW LABOR MARKET SURVEYS; LOCAL
GOVERNING BOARDS DO NOT PERFORM THEM

Section 52309 of the Education Code and Title 5, Section 11503, of the California Administrative Code require the department to approve the curriculum of vocational education courses at ROPs. The Administrative Code also requires that these courses be for training, retraining, and upgrading skills in recognized or emerging occupations and that they comply with the California State Plan for Vocational Education and with regulations established by the State Board of Education. Courses that do not comply with the State Plan for Vocational Education and the regulations must be placed on conditional approval. Further, the department must withdraw approval of conditionally approved courses if they are not brought into compliance. Only approved courses are eligible for state funding.

Section 78200 of the Education Code and Title 5, Section 55130, of the California Administrative Code require the chancellor's office to approve all vocational education programs offered by community colleges. The Administrative Code defines education programs as organized sequences of courses leading to degrees, certificates, diplomas, licenses, or the transfer to other colleges or universities.

The Education Code also requires the chancellor's office to monitor and review programs periodically for compliance with applicable

statutes and regulations. The approval of the chancellor's office is effective until the program is discontinued or modified in any substantial way. According to the Administrative Code, the chancellor's office may evaluate approved programs and may terminate the approval of programs if it determines the programs should not be offered.

When the governing boards of ROPs and community college districts apply for approval for vocational education programs, they must show that, based on an analysis of the labor market, there is a need for the programs. According to Sections 52302 and 78015 of the Education Code, governing boards of ROPs and community college districts must conduct studies of the labor market in the geographical areas in which they intend to establish vocational education courses and programs and in which students are likely to seek work. These studies are intended to justify proposed courses and programs by ensuring a labor market for the skills taught.

For vocational education programs at ROPs and community colleges, the Education Code requires that studies of labor markets be conducted in cooperation with the Employment Development Department, prospective employers, and the district's advisory committee on vocational education.* The studies should also include analyses of

*Advisory committees are established to provide advice on local job needs and on the relevance of courses to meet these needs. The committees are composed of members of the general public, especially representatives of business, industry, and labor.

vocational training programs maintained by other institutions in the area to ensure that the employment demand justifies the establishment of the proposed courses and programs.

Other Guidelines

Guidelines for conducting studies of labor markets are further defined in a publication prepared by the California Occupational Information Coordinating Committee (coordinating committee). The coordinating committee, which was established in 1978 to develop and improve occupational information used by planners, counselors, and students in vocational education, includes representatives of the department, the chancellor's office, the Employment Development Department, the Department of Rehabilitation, the California Employment and Training Advisory Council, and the Council for Private Postsecondary Educational Institutions. The coordinating committee's guidelines for labor market studies were issued in a 1982 report.

The committee's report, How To Develop And Use Labor Market Information In Local Occupational Program Planning, provides guidelines for conducting studies of labor markets. The report recommends procedures for obtaining, analyzing, and interpreting data about the availability of jobs for students with specific skills. These procedures include several steps: (1) checking the projections of employment published by the Employment Development Department and other sources of occupational data; (2) contacting a sample of local job

placement offices and reviewing classified ads in newspapers to determine the number and frequency of job openings in pertinent occupations; (3) checking with other training institutions offering similar programs to determine whether students are successful in completing programs and finding jobs; (4) surveying employers in the labor market to confirm the existence of job opportunities; (5) verifying information collected with the Employment Data and Research Division of the Employment Development Department; and (6) reviewing the results of labor market analyses with employer advisory committees established for the specific occupations in which programs are proposed.

ROPs and Community College Districts
Do Not Conduct Labor Market
Studies Before They Implement
Vocational Education Programs

Of the 74 courses the department approved at the four ROPs we reviewed, files indicated that staff at the ROPs had documented and verified the demand for labor for only 14 courses. Staff of those four ROPs had conducted studies of labor markets of these 14 courses, as required or recommended by the Education Code, the California Administrative Code, and the coordinating committee report, including reviewing projections of employment, surveying employers, and reviewing classified job ads. However, for 17 courses, ROP staff did not consider enough information to thoroughly document and verify the demand for labor. Finally, for 43 courses, ROP staff did not review any information to determine and verify the demand for labor in the

areas they serve. Table 1 shows how the four ROPs used the labor market data for courses we reviewed.

TABLE 1
THE USE OF LABOR MARKET DATA BY
FOUR REGIONAL OCCUPATION PROGRAMS

<u>Regional Occupational Program</u>	Number of Courses			
	<u>Approved</u>	<u>Labor Demand Documented and Verified</u>	<u>Labor Market Data Used</u>	<u>Labor Market Data Not Used</u>
San Diego	15	0	8	7
Los Angeles	12	7	5	0
San Francisco	31	0	0	31
Sacramento	<u>16</u>	<u>7</u>	<u>4</u>	<u>5</u>
Total	<u>74</u>	<u>14</u>	<u>17</u>	<u>43</u>

For ten programs the chancellor's office approved at the four community college districts we reviewed, files indicated that staff had thoroughly documented and verified, as required or recommended by the Education Code and the coordinating committee report, the demand for labor for only three programs. Staff at one district had reviewed some data for four programs but had not considered enough data to document and verify the demand for labor for those programs. One district had not considered any of the required or recommended data and, therefore, had not documented or verified the demand for labor for its programs. Table 2 shows how the community college districts used labor market data for programs we reviewed.

TABLE 2
THE USE OF LABOR MARKET DATA BY
FOUR COMMUNITY COLLEGE DISTRICTS

Community College District	Number of Programs			
	<u>Approved</u>	<u>Labor Demand Documented and Verified</u>	<u>Labor Market Data Used</u>	<u>Labor Market Data Not Used</u>
San Diego	3	0	0	3
Los Angeles	5	1	4	0
San Francisco*	-	-	-	-
Sacramento	<u>2</u>	<u>2</u>	<u>0</u>	<u>0</u>
Total	<u><u>10</u></u>	<u><u>3</u></u>	<u><u>4</u></u>	<u><u>3</u></u>

*All programs at San Francisco Community College District had been approved before 1979 and were not subject to our review.

The coordinator of the one ROP that did not verify demand for any courses told us that she did not conduct studies of labor markets because this process is too costly. She also said that her staff knows the labor markets in the areas served by the ROPs and, therefore, does not need to conduct extensive studies. However, we found little evidence in course and program files that staff had reviewed the labor market as required by state laws and regulations or recommended by the coordinating committee's study.

The State Does Not Always Request Or Review Surveys

For the ROP courses we reviewed, department staff did not always evaluate data from studies of labor markets and could not ensure that jobs existed for students with skills acquired in courses they approved. Furthermore, the department has not established procedures for consistently requesting data and reviewing it. For example, we interviewed three regional supervisors responsible for approving ROP courses. Each of the regional supervisors has different requirements for courses. One approves courses with no accompanying labor market data. Another approves only applications with specific data related to job openings. Finally, one regional supervisor reviews data from surveys of labor markets only if he feels the demand for a particular occupation is questionable.

The chancellor's office staff request from community college districts the required studies of labor markets, but the chancellor's office has not established procedures for determining which types of information constitute adequate studies. Consequently, some programs are approved without documentation and verification of a demand for labor. Chancellor's office staff who specialize in the occupations covered in the proposed programs review the studies. However, since the chancellor's office has not established procedures for evaluating the studies, staff are not consistent in the types of information about the labor market they require to document the demand for the program.

For example, in 1982, one community college district we reviewed started a vocational education program to train mechanics to repair diesel engines. The district purchased \$110,000 of equipment but had not conducted a complete study of the labor market before submitting an application for approval to the chancellor's office. The district included in the study the Employment Development Department's projections of employment, but those projections were for job categories that overstated the demand for diesel mechanics. Furthermore, the district had not verified the number of job opportunities by checking job placement offices or current classified ads, and it had not checked with similar programs in the area to determine how many students completed the program or with local employers to confirm the existence of job opportunities. Finally, the district had not checked with the local office of the Employment Development Department to verify labor market data, and it had not reviewed the results of the job market study with the pertinent advisory committee in the district. Nevertheless, the chancellor's office approved the program in 1981. The district operated the program for three years but could not maintain sufficient enrollment to continue its operation. After spending \$110,000 to purchase equipment, the district terminated the program in 1984.

THE STATE DOES NOT ENSURE THAT DISTRICTS
EVALUATE VOCATIONAL EDUCATION COURSES
AND PROGRAMS; LOCAL GOVERNING BOARDS
DO NOT ALWAYS PERFORM EVALUATIONS

During our review of four ROPs and four community college districts, we found that only the San Diego County ROP has set standards for measuring the effectiveness of vocational education courses and has performed evaluations to ensure that its courses are effective. Furthermore, the department and the chancellor's office do not enforce requirements that governing boards evaluate the effectiveness of vocational education courses and programs. As a result, the department and the chancellor's office cannot ensure that courses and programs train students for jobs that still exist.

Sections 52302.3 and 78016 of the Education Code require governing boards of ROPs and community college districts to evaluate, every two years, courses and programs established after September 1979, to ensure that they are effective. The governing boards are to ensure that their courses and programs (1) meet the demand for labor identified by the governing boards in their labor market studies; (2) do not duplicate other training programs in the area; and (3) are effective as indicated by the success of students in completing courses and programs and finding jobs related to their training. Furthermore, the Education Code requires the governing boards to set standards for effectiveness and to terminate, within one year, courses and programs that do not meet those standards.

At three ROPs and three community college districts, data in the files we reviewed indicated that governing boards have not established standards for measuring the effectiveness of courses and programs. Two ROPs and two community college districts have not performed periodic evaluations of courses and programs to determine if they are effective. Furthermore, they have not conducted studies to determine if labor markets still exist for the skills taught in the courses and programs. One ROP periodically reviews courses to determine if they are effective but has not established standards for the number of students completing courses or finding employment with skills taught in the courses.

Only one ROP we reviewed has established standards for completion and employment of students and has performed the required evaluations of its courses. That ROP, the San Diego County ROP, requires that 50 percent of students in vocational education courses complete those courses and find jobs. The administrator of the ROP told us that the ROP terminates courses not meeting those standards. For example, a course teaching pottery production did not place at least 50 percent of its students, as required by the ROP's standards, and the ROP terminated the course.

At one community college district, staff do review vocational education programs. However, the district does not evaluate the effectiveness of programs because the governing board has not established standards for measuring the success of students in completing programs and finding jobs.

At one community college district we reviewed, we found that an administrator was not aware of the requirements to evaluate courses and programs. Other administrators told us that they did not have the financial and staff resources to conduct the evaluations.

The State Does Not Monitor And Review Programs

Title 5, Section 11503, of the California Administrative Code and Section 78200.5 of the Education Code require that the department and the chancellor's office periodically monitor and review approved courses and programs at ROPs and community colleges to ensure that they comply with all applicable laws and regulations. To comply with the requirements of the Education Code, the department and the chancellor's office have implemented processes for reviewing programs.

Until 1984, the department used the program administrative review process as part of its Vocational Education Accountability System. The program administrative review, designed to ensure that each school district and ROP properly administered vocational education funds, tested compliance with federal and state laws and regulations. The chancellor's office also implemented a program administrative review process to fulfill its responsibility to review and monitor programs and to ensure compliance with laws and regulations. The administrative review process at both the department and the chancellor's office included reviews to determine if the governing boards of the ROPs and community college districts evaluate courses and programs every two years as required by the Education Code.

Since fiscal year 1981-82, the department has reviewed 48 of the 68 ROPs. In its reviews, the department found that the governing boards of 17 ROPs did not conduct evaluations of courses every two years and that the governing boards of another 25 did not establish standards by which to evaluate their courses. During our review, we found that the department did not follow up to ensure that governing boards took action to perform required evaluations.

In 1984, the department discontinued using the program administrative review process to monitor school districts and ROPs and established the coordinated compliance review process. However, the department does not use that process to test compliance with state laws and regulations at ROPs and does not ensure that governing boards of ROPs evaluate their vocational education courses every two years. The department's coordinator for the southern regional office of the Vocational Education Division told us that, with one exception, the department did not follow up on reviews and discontinued the program administrative review process because the department reduced staff at regional offices responsible for the reviews. He also said that the program administrative reviews were not a high priority for the department. Instead, the department focused its efforts on the coordinated compliance review process.

Although the chancellor's office has performed reviews of all 70 community college districts, those reviews have not always ensured that district governing boards comply with the Education Code

requirement that they evaluate their programs. In a memorandum dated January 21, 1987, the specialist for academic planning and development said that while the program administrative review process has done a relatively thorough job of informing colleges of their compliance obligations, there has been little independent testing, and there is no documentation that any corrective action is being taken as a result of the monitoring efforts of the chancellor's office.

Recently, the chancellor's office has taken steps to strengthen its efforts to monitor vocational education programs. For example, the academic planning and development specialist said that the chancellor's office has received approval of a budget change proposal for two additional staff positions to be added to the Program Evaluation and Approval Unit. The additional staff are to be used to improve the program administrative review process through field visits to colleges to verify compliance with laws and regulations. However, the specialist for academic planning and development said he could not guarantee that future reviews would include a review of district requirements to evaluate vocational education programs as required by the Education Code.

CONCLUSION

The State Department of Education and the Chancellor's Office of the Community Colleges have not ensured that regional occupational programs and community college districts conduct

studies of labor markets for new vocational education courses and programs they approve. In addition, they have not ensured that ROPs and community college districts evaluate the effectiveness of courses and programs. Furthermore, ROPs and community college districts do not always conduct studies of labor markets for new vocational education courses and programs, nor do they evaluate the effectiveness of courses and programs or set standards for measuring their effectiveness.

RECOMMENDATIONS

To ensure that labor markets exist for new vocational education courses and programs the department and the chancellor's office should take the following actions:

- Establish procedures for consistently reviewing studies of labor markets before they approve new courses and programs; and
- Ensure that ROPs and community college district governing boards conduct studies of labor markets before submitting course and program applications to the department and the chancellor's office.

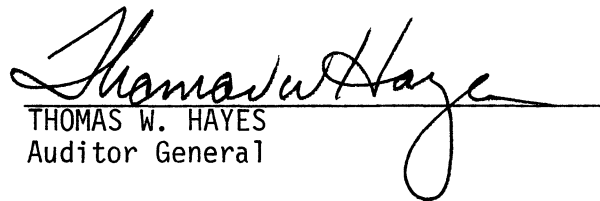
To ensure that vocational education courses and programs are effective, the department and the chancellor's office should take the following actions:

- Require governing boards of ROPs and community college districts to establish standards for measuring the effectiveness of their courses and programs, to evaluate their courses and programs every two years, and to terminate ineffective courses and programs within one year as specified in the Education Code; and

- Review the evaluations to ensure that they comply with the Education Code and the Administrative Code.

We conducted this review under the authority vested in the Auditor General by Section 10500 et seq. of the California Government Code and according to generally accepted governmental auditing standards. We limited our review to those areas specified in the audit scope section of this report.

Respectfully submitted,


THOMAS W. HAYES
Auditor General

Date: March 9, 1987

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APPENDIX

COURSES AND PROGRAMS WE REVIEWED
AT FOUR REGIONAL OCCUPATIONAL PROGRAMS
AND FOUR COMMUNITY COLLEGE DISTRICTS

	<u>Courses or Programs</u>	
	<u>Total Approved Since 1979</u>	<u>Number Reviewed</u>
Regional Occupational Program		
San Diego County ROP	181	15
Los Angeles Unified School District ROC/P	68	12
San Francisco County ROP	31	31
Sacramento County ROP	<u>54</u>	<u>16</u>
Subtotal	<u>334</u>	<u>74</u>
Community College District		
San Diego Community College District	4	3
Los Angeles Community College District	6	5
San Francisco Community College District	0	0
Los Rios Community College District	<u>7</u>	<u>2</u>
Subtotal	<u>17</u>	<u>10</u>
Total	<u>351</u>	<u>84</u>



CALIFORNIA STATE DEPARTMENT OF EDUCATION

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Bill Honig

Superintendent

of Public Instruction

March 3, 1987

Thomas W. Hayes, Auditor General
Office of the Auditor General
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Sacramento, CA 95814

Re: P-509

Dear Mr. Hayes:

Thank you for the opportunity to review the draft report titled "California Needs to Do More to Evaluate the Effectiveness of Vocational Education Programs." We generally concur with the findings and recommendations with the understanding that the focus and direction was limited to specifically reviewing regional occupational centers and programs. ROC/P courses, while extremely vital and important, presently constitute only about 18 percent of the total vocational education effort at the secondary level. This report thereby reflects an assessment of only one segment of the total secondary vocational education delivery system.

We have already begun to carry out the recommendations of this report because we too feel they are in the best interest of ROC/Ps in California. In December 1986, we convened an advisory committee composed of individuals representative of the ROC/P governing boards and state staff for the purpose of developing a handbook which will address, but not be limited to, the following issues which relate to the report's recommendations:

1. Establish procedures for reviewing labor market data before we approve new courses
2. Ensure that ROC/Ps conduct labor market studies before submitting new courses for approval
3. Assist the ROC/P governing boards in establishing standards for measuring the effectiveness of their courses
4. Conduct evaluations to ensure that ROC/Ps comply with the Education Code and with the California Administrative Code

In the effort to develop a handbook that can be used by field and state staff, the advisory committee is addressing a number of

Thomas W. Hayes
March 3, 1987
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issues in addition to those listed above. A draft should be available no later than June 1, 1987 with implementation of the process and procedures by September 1, 1987.

It is important to note that in the last decade the ROC/Ps have experienced tremendous growth while state staff has declined by approximately 50 percent. With fewer resources available, it is difficult to provide the approval, monitor, and technical assistance roles to aid ROC/Ps in ensuring quality and in complying with state laws and regulations.

We would like to extend our gratitude to your staff for the positive and cooperative manner in which they conducted the audit, both within this Department and with our field colleagues.

Sincerely,



William D. Dawson
Executive Deputy Superintendent

WDD:c

CALIFORNIA COMMUNITY COLLEGES

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March 4, 1987

Mr. Thomas W. Hayes
Auditor General
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Sacramento, CA 95814

Dear Mr. Hayes:

My staff and I have reviewed your Office's report, "California Needs to Do More to Evaluate the Effectiveness of Vocational Education Programs", and this letter is intended to serve as my formal comments on that review. Let me stress at the outset that these responses are based only upon analyses that the Chancellor's Office can legitimately make and do not address the findings concerning the State Department of Education or the educational entities under its jurisdiction. Neither do these comments necessarily reflect the views of the 70 separate legal entities (districts) that comprise the California Community Colleges.

I want to begin by saying that the two specific focuses of the Auditor General's inquiry -- the use of labor market information and systematic evaluation techniques in determining the efficacy of vocational programs -- are not new issues to me or my staff. Neither are the general findings of a lack of application of such data and techniques surprising to us. These have been perennial problems in vocational education, and they are not unique to California. That is not to say that this Office will not continue to improve in addressing its responsibilities in these areas and I hope the comments which follow will assure you of that. Let me turn, then, to my responses to the specific findings as stated in the Summary section of the report.

1. The report finds that the Chancellor's Office "does not always require districts to verify the demand for labor before approving new . . . programs." (Emphases added). I concur in that finding because it is carefully qualified, based on the methodology and assumptions of the inquiry.

The Chancellor's Office does always require that districts submit labor market information as part of its program review and approval process. (See Program and Course Approval and Reporting Procedures Handbook). However, as the report notes, the data submitted in that process frequently do not meet the specifications of all the COICC guidelines for a variety of reasons (e.g. the districts find that the data available often are not "district specific", are negatively affected by employer

bias or are not current or accurate as regards emerging occupations). Consequently, this Office often relies on the professional judgements of staff in determining the adequacy of the data that are submitted.

2. The report finds that the Chancellor's Office does not "require the districts to evaluate courses and programs to ensure that they are effective" and that it "has not enforced the requirements that governing boards perform evaluations . . ." I concur in the second part of this finding (i.e. as regards "enforcement") and partially concur in the first part (i.e. as regards "requiring").

Although I understand that the Chancellor's Office has not always consistently administered the annual Program Administrative Review survey (PAR) in past years, it is true that that document requires districts to certify that they are mindful of this compliance responsibility and are meeting it to the best of their knowledge and ability. In addition, the California Occupational Program Evaluation System (COPEs) was abolished in 1983 because of its costly on-site validation process and a subsequent evaluation program met with resistance from the field as an infringement on local autonomy. However, during fiscal years 1983/84 and 1984/85, all colleges were provided vocational education program evaluation questionnaires, and we now have evaluation results on 675 programs for that period. Since my term as Chancellor began, that document has been revised using college input, and this Occupational Education Program Evaluation System will be field tested beginning in March in sixteen occupational programs throughout the colleges. The questions are based upon the 32 program standards adopted by the Board of Governors in the Three-Year State Plan.

In addition, a vocational student followup process has been developed and field tested over the last three years, and we hope to have all colleges on the system by June 1989. It is anticipated that the student followup will provide information on over 350,000 students at that time; 50,000 students have already been surveyed. An employer followup process is in the design stage with plans to field test that process during the 1987-88 program year. As a part of the student followup process, we are identifying student competencies for the various occupational programs.

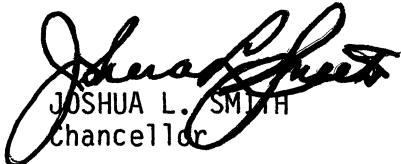
Nevertheless, it remains true that this Office is not currently in a position to consistently enforce the evaluation requirement due to a lack of staff in the compliance unit. The Board of Governors requested additional positions in its 1987-88 Budget request and the Governor's proposed budget recommends approval of two such positions. Currently, however, the Legislative Analyst is opposing those positions, and it remains to be seen whether the Office will be able to improve its record in this area as the Board and I wish it to do.

3. Finally, the report makes similar findings vis a vis the districts as regards the lack of verified labor market data

and systematic evaluations of vocational programs. Having conceded above that the Chancellor's Office has itself not been able to fully exercise its own compliance responsibilities in these areas, it must be clear that I cannot either concur in or object to those findings. I will take this opportunity, however, to make two observations.

- a) Given the fact that the 106 community colleges in California offer over 31,000 vocational education courses, findings from a sample of 7 programs in 4 districts (all of which are in major metropolitan areas and which on almost any measure are not representative of the California Community Colleges overall) must certainly be subject to question.
- b) It is my hope that the improved accountability procedures referred to above and the addition of compliance staff in 1987-88 will enable this Office to prepare a more complete and accurate picture of the colleges' efforts in these areas in the future. More important, I hope that those procedures and staff additions will, over time, improve upon whatever we initially find to be the conditions in the districts.

Yours sincerely,


JOSHUA L. SMITH
Chancellor

*Auditor General's Comment: The chancellor's office points out that 106 community colleges offer over 31,000 vocational education courses. We reviewed 4 of the 70 community college districts. These districts are responsible for the operation of 16 colleges or 15 percent of the community colleges in the State.

While it is true that community college districts offer many courses of instruction and many of those courses make up educational programs, not all courses must be approved. Only those courses not offered in approved educational programs are to be submitted to the chancellor's office for approval. We focused only on vocational education programs approved after 1979. As we point out in the Appendix, the four community college districts we reviewed had submitted a total of 17 new programs for approval. We reviewed 10 of those programs.

cc: Members of the Legislature
Office of the Governor
Office of the Lieutenant Governor
State Controller
Legislative Analyst
Assembly Office of Research
Senate Office of Research
Assembly Majority/Minority Consultants
Senate Majority/Minority Consultants
Capitol Press Corps