

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES
GOVERNING CAREER-READY PATHWAYS TO DIPLOMA
PUBLIC COMMENTS AND RESPONSES**

Commenter Name: David Gupta, Vice President, State and District Partnerships, College Board, 7/12/24

Comments: Attached document.

Division Response: **Comment considered. No changes made.**

Commenter Name: Dr. Mike Hernandez, Executive Director, Arkansas Association of Educational Administrators, 7/14/24

Comments: Section 7.02: Subject to legislative appropriation, the Department of Education may reimburse employers, including without limitation public school districts and open enrollment public charter schools, for the proportionate cost of workers' compensation premiums for students in work-based learning opportunities in accordance with department rules.

Suggested Change: Replace "may" in the first sentence with "shall."

Rationale: Since the LEARNS Act states that students in a work-based learning opportunity shall be covered by the workers' compensation insurance of his or her employer, the rules need to reflect that districts serving as an employer of these students will be reimbursed for this cost. It is understood that the rules reflect the law in its current form. However, if funds become available, schools should receive funding to cover insurance since they are mandated as employers to provide coverage with no clearly identified funding source.

Division Response: **Comment considered. A substantive change was made.**

Commenter Name: Arkansas Public School Resource Center, 7/15/24

Comments: Section 2.02, Page 1: Will a career-ready pathway to a diploma be the Diploma with Merit?

Division Response: **Comment considered. No changes made. Career pathways which result in diplomas demonstrating merit and diplomas demonstrating distinction will be identified on the division's website.**

Commenter Name: Arkansas Public School Resource Center, 7/15/24

Comments: Section 4.02, Page 3: How was the number of "... minimum of four (4) career awareness and exploration activities for each student ..." determined?

Division Response: **Comment considered. No changes made. The early career exposure LEARNS work subgroup provided a minimum of four career awareness and exploration activities as a recommendation which was approved by the career ready pathways group.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 4.01: There are commas missing following "including" and "limitation".

Division Response: **Comment considered. A non-substantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2.01.1: The semicolon after "services" should be a comma.

Division Response: **Comment considered. A non-substantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2.06: I would recommend changing "eighth grade" to "grade eight (8)" to align with 4.01.

Division Response: **Comment considered. A non-substantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 4.01: To align with 4.02.1.1, "(6-8)" should be added after "eight".

Division Response: **Comment considered. No changes made. The rule as written reflects the suggested changes.**



July 12, 2024

Arkansas Department of Education
Division of Elementary and Secondary Education (DESE)
Four Capital Mall, Room 302A
Little Rock, AR 72201

Dear Secretary Oliva:

On behalf of the College Board, a mission-driven organization that connects students to college success and opportunity, I'm writing to provide feedback on the proposed rules governing Career-Ready Pathways to Diploma. We are excited to see alignment between the College Board's *new* Career Kickstart, powered by AP program, and the state's push for career ready pathways. College Board would like to ensure that Career Kickstart is an allowable option for schools to meet the new pathway requirements.

Career Kickstart is a career-focused program that leads to credentials and college credits for all students who want to prepare for a career via career and technical education (CTE) courses. Career Kickstart courses are powered by the Advanced Placement (AP) features that educators value: robust teacher training, dedicated educator communities, free student resources, high quality assessments, and the broadest national network of college credit policies. Career Kickstart courses are built to eliminate unnecessary prerequisites and other barriers that can otherwise prevent motivated students from succeeding. Generally, in a recommended sequence for the Cybersecurity, students could take the first Career Kickstart course in 10th grade.

In the 2025-2026 school year, Career Kickstart will be operational in 20+ states, and we're working actively to obtain college credit for spring 2026 exams. We hope to include Arkansas among these states and look forward to working with DESE to create a path forward to offer these new courses to Arkansas students. Career Kickstart will be available nationwide starting in the 2026-2027 school year.

Our comments below highlight alignment between the Career-Ready Pathways to Diploma and Career Kickstart programs. As always, College Board welcomes collaboration with DESE to amplify these innovative efforts in support of students.

College Board's New Career Kickstart, Powered by AP

Career Kickstart offers students many paths to a successful future whether they are heading to 2- or 4-year colleges, technical schools, or the workforce. The courses are designed to help students explore careers and develop professional skills in a way that is accessible to as many students as possible. With a focus on high-demand fields like cybersecurity, Career Kickstart brings the best of AP to courses designed for CTE. Courses are built with both industry and college faculty to emphasize hands-on experience, professional and technical skills, and alignment to CTE standards and credentials valued by industry. **This model strongly aligns to how the state defines a "Career-ready pathway" in the proposed rule.**

Feedback for 3.00 Career-Ready Pathways Implementation and 6.00 Career-Ready Pathway Program Development

- The proposed rule requires a career-ready pathway to a high school diploma to have challenging academic courses that align to graduation requirements and CTE programs of study aligned to high-wage high-growth jobs in the state. **Career Kickstart strongly aligns to this requirement.**
 - Career Kickstart offers two-course pathways that equip students for in-demand careers.
 - Courses are designed to offer an applied, inclusive classroom experience focused on career connections, and to provide teachers with the resources they need.
 - Career Kickstart is currently in pilot for the 2024-2025 school year but will achieve operational status in 20+ states in the 2025-2026 school year with cybersecurity courses. A national launch will occur in the 2026-2027 school year.
 - Career Kickstart plans to build out multiple CTE pathways in additional sectors over the coming years.

- The proposed rule also requires educators for career-ready pathway courses to include CTE instructors and other teachers who have received the appropriate staff development or in-service training to enable them to teach career-ready pathway courses, including specific certifications where relevant, according to educator licensure requirements. **Career Kickstart, powered by the AP model, can be a turn-key option to meet proposed rule requirements.**
 - Career Kickstart courses offer robust support materials for teachers including:
 - Course framework outlining the essential knowledge and learning objectives for each course, with pacing suggestions, emphasizing both the technical and professional skills needed in industry.
 - Sample lesson plans aligned to the course frameworks, utilizing applied and career-connected pedagogy.
 - Five-day summer training on course content, lesson development, and delivery.
 - Monthly professional learning opportunities during the school year.
 - Online teacher community to share best practices with over 130 cybersecurity teachers.

 - Whenever a teacher is unavailable to teach a career-ready pathway course, the career-ready pathway course may be taught in partnership with another public school district, open-enrollment public charter school, secondary career center, or community college including through the aid of technology and computer software whenever possible.

 - College Board is also partnering with states to ensure teacher certification flexibility so that districts and schools have access to educators prepared to successfully teach important courses.

Feedback for 5.00 Career-Ready Pathways Requirements

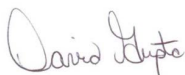
- The proposed rule requires each school district to offer at least one career-ready pathway that is aligned to state and regional workforce demands. This includes expanding course offerings that are part of a local or statewide articulation agreement with institutions of higher education, concurrent enrollment courses, industry training programs, and digital learning

opportunities. **Career Kickstart can partner with the state, districts, and schools to meet this requirement.**

- College Board is also actively working to obtain college credit for spring 2026 exams.
 - Career Kickstart courses are powered by the AP features that educators value including the broadest national network of college credit policies.
 - Career Kickstart courses are designed to align with industry-recognized credentials and qualify students for college credit beginning in the 2025-26 school year.
 - Each of the two Career Kickstart cybersecurity courses are equivalent to college-level courses – developed in partnership with higher education, each course meets all the requirements necessary to earn college credit.
- In response to the need for skilled workers to fill in-demand cybersecurity jobs in Arkansas and across the country, Career Kickstart’s initial pathway is in cybersecurity.
 - Looking across six IT/cyber/networking occupations, Arkansas will require an educated workforce to fill the 17,000 open jobs projected for 2034.¹ The two-year-long courses in the CK Cybersecurity Pathway are designed to provide students with stackable credentials that can apply to entry-level jobs and to college, and to help connect them to jobs that provide good salaries in this in-demand, high-growth industry.

Career Kickstart offers Arkansas a compelling approach to meet proposed rules for the Career-Ready Pathways to Diploma. College Board believes that Career Kickstart will accelerate and connect students to in-demand careers as Arkansas envisions this new pathway option while giving them the opportunity to earn industry credentials and college credit. We look forward to collaborating with Arkansas to ensure that students make the most of these opportunities.

Sincerely,



David Gupta
Vice President, State and District Partnerships
College Board

¹ Per Lightcast, a labor market analytics company.