



August 4, 2017

U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

RE: Agency Reform Taskforce Comments

To Whom It May Concern:

On behalf of the Association for Career and Technical Education (ACTE), the nation's largest not-for-profit association committed to the advancement of education that prepares youth and adults for career success, and Advance CTE, representing the state and territory leaders of our nation's Career and Technical Education (CTE) system, we write to provide comments for the U.S. Department of Education's Agency Reform Taskforce on improving efficiency, effectiveness and accountability across the department's activities and programs.

As you are aware, CTE equips students of all ages with the academic and technical skills, knowledge, and training they will need for career success, which makes CTE an important component of the ED's mission of educational excellence and equity. As such, we have provided recommendations on ways that ED can maximize the potential of CTE with four key action items: provide a national support system for the CTE field, implement K-12 education policies that promote college and career success, encourage CTE research and evidence-based best practices, and invest in CTE programs that support our nation's workforce.

Providing a Support System for the CTE Field

Within the department, the job of supporting CTE program in our nation's high schools, technical centers and community colleges falls to the Office of Career, Adult, and Technical Education (OCTAE). As one of the few federal offices solely dedicated to the dual mission of promoting education and workforce training, ED can emphasize the importance of OCTAE and ensure that the office plays an influential role in developing important national policies in the coming years. Whether engaging in initiatives to expand apprenticeships, promoting affordable and accessible postsecondary education, or implementing a reauthorized Carl D. Perkins Career

and Technical Education Act, OCTAE should be instrumental in realizing a policy agenda that puts all Americans on a pathway to a rewarding career.

We have been pleased with OCTAE's current career staff who have been extremely dedicated to CTE and willing to work constructively with the field to address our challenges and concerns. *The leadership at OCTAE should have a strong appreciation for the full breadth and diversity of the CTE field, and advocate on behalf of CTE within the Administration. Additionally, ED should empower OCTAE career staff to continue to work collaboratively with states and local CTE practitioners.*

Preparing Students for College and Career Success

The enactment of the Every Student Succeeds Act (ESSA) was a major step toward ensuring that all students are prepared to graduate from high school ready for college and a career. The new law includes critical measures to strengthen the role of CTE in our nation's K-12 education system by promoting strategies to integrate academic and CTE content in the classroom, expanding the use of CTE student performance information, and supporting the recruitment and training of CTE teachers. As states and school districts look toward fully implementing the new law in the coming year, ED will continue to have a critical role in ensuring an effective transition.

An important advancement in ESSA was the inclusion of CTE in the definition of a well-rounded education. Along with English, science, mathematics, history and the arts, CTE is counted among the critical subjects that contribute to the academic and career success. *The Administration should work to clarify the role of well-rounded education across ESSA programs, building on the non-regulatory guidance from October 2016, to ensure that CTE can be part of a comprehensive and coordinated educational pathway for all students.*

Additionally, the Student Support and Academic Enrichment Grant (SSAE) program in Title IV of ESSA provides funding for school districts to offer college and career guidance programs, which may include career awareness and exploration activities, as well as professional development for counselors. *Here again, ED can build past efforts, like the non-regulatory guidance issued last year, to communicate to states and districts the value of career guidance and counseling, and the option to use ESSA resources to support this work.*

Promoting Research and Best Practices

The activities funded under Perkins National Programs are critical to the CTE field. The National Research Center for Career and Technical Education, which is funded by OCATE through Perkins National Programs, is key source of CTE data analyses and research. The materials and research projects produced by the National Center, such as Math-in-CTE and

Literacy-in-CTE initiatives, are directly relevant to CTE educators and benefit classroom practices. *ED must Support the continuation of a national research center for CTE focused directly on CTE research and dissemination, particularly in high-priority areas such as teacher training and professional development.*

Additionally, Perkins National Programs fund other activities that benefit the CTE system, including technical assistance for states, dissemination of best practices and support for initiatives that improve the overall quality of CTE nationwide. *The department should continue a focus on research, evaluation and technical assistance targeted toward improving CTE practice. It is important that these resources be dedicated to projects and activities that directly benefit CTE, and not to fund activities at ED that are unrelated to goals of Perkins National Programs.*

Investing in the Workforce

The Perkins Act serves as the primary source of dedicated federal funding for CTE. Perkins funding helps to build the capacity of secondary schools and postsecondary institutions to serve millions of students nationwide through programs that are academically rigorous and aligned to the needs of American business and industry. This critical investment in CTE supports states and locals in expanding access to CTE programs of study, providing career guidance and counseling services, purchasing classroom equipment, and offering professional development opportunities for CTE educators. Perkins funding delivers a strong return on the public's investment, as students involved in CTE programs are more engaged, perform better academically and graduate at higher rates. An educated and highly skilled workforce helps to strengthen the economy through enhanced productivity and innovation.

Despite the benefits of investing in Perkins, the Administration's Fiscal Year 2018 budget proposes deep cuts to programs directly serving CTE students. The budget plan recommends that funding for the Perkins Basic State Grant program be cut by 15 percent—\$168 million below the current level. States like Ohio, Florida, Colorado, Georgia and Nevada will lose between 7.5 and 52 percent of their state grant allocation under this proposal, delivering a devastating blow to their CTE programs and the students they serve.

While CTE has an important role in preparing students for careers in STEM fields, the proposal to shift \$20 million in funding to a new, competitive grant for STEM education would not make up for the loss of federal resources directly supporting CTE. Moreover, such a program would benefit only a small number of programs, with rural and low-income communities, where schools often lack the resources to compete for funds, at a particular disadvantage. *ED should clearly identify investments in CTE as a priority by including an increase in funding for Perkins in future budget requests. The department should also prioritize funding for Perkins Basic State Grant*

program that equitably provide resources to all parts of country, rather than narrowly focused competitive grants that create isolated pockets of success.

Thank you for your thoughtful consideration of these recommendations. We look forward to working in cooperation with the department on our shared goal of improving education for all of our nation's students. Please feel free to contact Mitch Coppes (mcoppes@acteonline.org), ACTE's Legislative and Regulatory Affairs Manager, or Kathryn Zekus (kzekus@careertech.org), Advance CTE's Senior Associate, Federal Policy, should you have any questions about our comments.

Sincerely,



LeAnn Wilson
Executive Director
ACTE



Kimberly A. Green
Executive Director
Advance CTE