



October 14, 2025

Amber Northern
Senior Advisor
Office of the Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

***Re: Request for Information on Redesigning the Institute of Education
Sciences (Docket ID: ED-2025-IES-0844)***

Dear Senior Advisor Northern,

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, the nation's longest-standing not-for-profit that represents State Directors and leaders responsible for secondary, postsecondary, and adult Career Technical Education (CTE) across all 50 states and U.S. territories, we are writing in response to the Federal Register notice released September 25 requesting feedback on redesigning the Institute of Education Sciences (IES).

We appreciate the opportunity to provide comments on redesigning the IES, ensuring that resources are focused on the most critical and relevant data and research that assesses learner, program and employer outcomes and supports evidence-based decision making. We also note that redesigning IES is a [significant undertaking](#) which requires thoughtful consideration of the activities and functions most needed to support these efforts and strongly suggest extending this comment period to at least October 25 to provide for a standard 30-day comment period. Educational research, evaluation, and data collection are among the most essential responsibilities for the U.S. Department of Education (ED).

CTE sits at the intersection of our K-12, postsecondary, and workforce development systems, allowing learners to explore career pathways and attain the skills needed to succeed in high-skill, high-wage, and in-demand careers. In the previous 118th Congress, we were engaged with Congress' wider efforts to reauthorize the Education Sciences Reform Act (ESRA) through our strong support of the Data for American Jobs Act (S. 2290). Many of the ideas and recommendations contained in this comment are included in this legislation and we encourage you and your colleagues within the Administration to work closely with lawmakers to meaningfully rebuild the many important educational research, evaluation, and data functions that have been abruptly impacted this year.

To these ends, our organizations offer the following recommendations to ensure that the nation's data infrastructure and research efforts are designed to assess the most relevant learner outcomes and inform future federal and state CTE policy.

Better Incorporate CTE into the Research Agenda: Currently, most CTE data collections undertaken by the National Center for Education Statistics (NCES) are not standalone but rather incorporated into existing surveys, limiting the scope of federal CTE data that researchers and policymakers can engage with. We recommend that IES expand its CTE research and data collection activities and leverage grantmaking to support states' CTE research and data capabilities.

Our organizations suggest that the Department authorize additional surveys that collect data on CTE learners, educators, programs and credentials. This collection could help answer questions not only about learner outcomes in the workforce but about how CTE is organized and delivered, the most effective elements of CTE programs, the state of the CTE teacher workforce, and more. Prioritizing CTE in this way would align with [Secretary McMahon's recently proposed supplemental priority](#) on expanding access to career pathways and workforce readiness.

Another way to focus IES resources on better understanding CTE program outcomes is to develop a longitudinal study of postsecondary program completers that includes a wider variety of credential types. This new study would replace the discontinued Baccalaureate and Beyond longitudinal study, expanding the collection to track the post-college outcomes of students who complete any undergraduate credential, from short-, medium- and long-term certificates to associate and bachelor's degrees. It would capture the growing use of sub-baccalaureate credentials – with over 1.5 million being awarded in 2023-24¹ – and align with the expansion of Pell Grant eligibility to short-term workforce programs (“Workforce Pell”). This type of data would be incredibly useful for program design and evaluation, as well as providing actionable data for learners and families to help make informed decisions about postsecondary options. These suggestions are also supported by several other organizations commenting on this RFI which we have endorsed as well.

In addition, IES should continue to support grants for CTE research and the [CTE Research Network](#), which has produced causal CTE studies showing positive impacts on student outcomes; fostered a learning community of CTE researchers with skills in conducting rigorous research; and explored implementation of CTE to examine what works, for whom, where, and why.

Support Cross-agency Data Sharing on the Federal and State Levels: Linking education, employment and wage data is critical for stakeholders to gauge the effectiveness of CTE programs. However, these connections have been hampered on both federal and state levels by policy and technical challenges.

While a federal student-level data network would be the most efficient way to facilitate data sharing to improve reporting on learner and program outcomes, in the absence of such a system, IES should formulate stronger partnerships among the Department and other federal agencies such as the Census Bureau, Department of Labor, Social Security Administration and Health and Human Services Department to link education, employment and wage data on the federal level. This will better support research and data on CTE learner outcomes and the implementation of Workforce Pell and other key postsecondary investments by fostering a better understanding of how learners fare within the wider economy and labor market during and after their program experiences. Critically, the federal government serving in this capacity can also help ensure data privacy and security of this information.

¹ [Integrated Postsecondary Data System, 2023-24.](#)

In addition, IES should prioritize resources and guidance for the State Longitudinal Data System (SLDS) Grant Program and pursue better integration between SLDS and the Workforce Data Quality Initiative Grant Program to ensure that states can expand their capacity to connect education and workforce outcomes and use this data to inform CTE policy and practice. We strongly support comments made by the Data Quality Campaign (DQC) regarding these aspects of IES's current and future responsibilities.

Better Align Existing Research and Data with CTE Practice: Current NCES data collection efforts use definitions and categories that don't align well with how CTE is practiced in the field. We recommend that IES redesign its data collections to be more actionable for the field and policymakers by using the modernized [National Career Clusters® Framework](#), which is the primary classification schema for CTE programs used in states and required for federal reporting under the Perkins V Act; recognizing the variety of CTE institutions, including [area technical centers \(ATCs\)](#), that are serving secondary, postsecondary and adult learners; and incorporating questions about the breadth of CTE program elements, including career planning, navigational supports, work-based learning, credentials, and early postsecondary credit opportunities.

Ensure that Critical Information is Widely Accessible: The IES produces critical education research and data that is freely accessible to researchers, policymakers and the public. However, recent firings and contract cancellations at the IES threaten the agency's ability to collect and release data in a timely manner, including the National Evaluation of CTE Under Perkins V (NECTEP). Following the actions taken earlier this year throughout IES, it remains unclear nearly eight months later whether this Congressionally-mandated evaluation of Perkins V will be completed or on what newly amended timeframe.

We recommend that additional resources and staffing be provided to ensure that federal and state policymakers, researchers and other stakeholders have access to the information needed to inform CTE policy and improve learner outcomes.

We appreciate your time and consideration of our comments and recommendations. Should you have any questions or would like to discuss the issues raised in this letter further, please do not hesitate to contact ACTE's Chief Policy, Research and Content Officer Alisha Hyslop (ahyslop@acteonline.org) or Advance CTE's Senior Policy Advisor Steve Voytek (svoytek@careertech.org).

Sincerely,



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