

October 27, 2025

The Honorable Linda McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Proposed Priority and Definitions: Secretary's Supplemental Priority and Definitions on Career Pathways and Workforce Readiness (Docket ID ED-2025-OS-0679)

Dear Secretary McMahon,

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're writing in response to the Federal Register notice regarding the Secretary's Proposed Priority and Definitions on Career Pathways and Workforce Readiness.

Our organizations applaud the Department's focus on using discretionary grant funds to support projects that foster opportunity and mobility for students and economic competitiveness on the local, state, and national levels. We appreciate the opportunity to provide feedback on this proposed priority with these comments, alongside our separate response to the priority on Meaningful Learning Opportunities.

CTE sits at the intersection of education and workforce development, connecting school-based skills building and academic credentials with on-the-job learning and industry credentials to support employer needs and learner success. For this reason, we encourage the Department to prioritize proposals that leverage the infrastructure, expertise, and cross-sector alignment that already exist within the CTE system.

Alignment of CTE programs with workforce development activities, career pathways initiatives, and employer needs is facilitated through the Carl D. Perkins Career and Technical Education Act (Perkins V) in a multitude of ways, including shared terms,

definitions, expectations for stakeholder engagement and consultation, and accountability indicators with the Workforce Innovation and Opportunity Act (WIOA). In addition, states must describe a shared vision for education and workforce alignment in their state plans while comprehensive local needs assessments that evaluate program alignment to local and regional labor market needs are used to guide local funding decisions.

Given these legislative requirements and CTE's unique position bridging education and workforce systems, states are increasingly using CTE programs, experiences, and funding to address broader career readiness needs for all learners. This includes aligned pathway models like early college and youth apprenticeships, integrated advising systems, and other essential initiatives.

The CTE system is also an important partner in apprenticeship, providing such benefits as early career exploration, learner preparation to enter into apprenticeship, accelerated time to productivity, and existing infrastructure for related technical instruction/classroom learning that reduces cost for employers and program sponsors. CTE can also facilitate meaningful connections between postsecondary education and apprenticeship programs by aligning curriculum, creating credit articulation opportunities, and developing integrated pathways that value both academic and work-based learning.

The education and workforce alignment that is fundamental to CTE has resulted in positive academic and workforce outcomes:

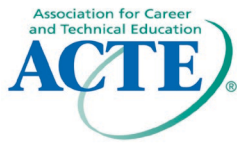
- A meta-analysis of research across 28 studies found that students who took secondary CTE courses have higher rates of high school completion, two-year college enrollment, and employment after high school compared to non-CTE students. The study also found no statistically significant negative impacts of CTE participation.¹
- CTE students who participated in a youth apprenticeship stay in their CTE field of study at a higher rate than those who did not.²
- On average, regional CTE programs in West Virginia serve 93% of long-term projected employment openings in high-demand occupations within their region.³
- In Ohio, the return on investment for a career technical certificate after five years is 223.6%.⁴

¹ [What We Know About the Impact of Career and Technical Education: A Systematic Review of the Research](#)

² [The Impact of Youth Apprenticeship and Employability Skills Programs on Career & Technical Education Concentrator-Completer Post Graduation Outcomes](#)

³ [Assessing the Alignment between West Virginia's High School Career and Technical Education Programs and the Labor Market](#)

⁴ [The Economic Benefits of Career Technical Education on the State of Ohio](#)



In addition, to ensure that the grant funds invested are impactful for both learners and employers, we encourage the Department to prioritize projects that incorporate rigorous accountability measures already used under Perkins V, through which states and local providers have the necessary data infrastructure already in place to capture important learning and employment outcomes such as program completion, post-program placement, and opportunities to earn credits and credentials and participate in work-based learning.

Finally, while supplemental grant funding can and should build on already existing CTE infrastructure and alignment with the workforce system to support career pathways and workforce readiness, it is also true that Perkins is the smallest federal investment of the four major education and workforce programs regularly updated by Congress across K-12, higher education, and workforce development. CTE is well positioned to serve as a bridge among these systems; however, learner needs for CTE and related experiences far outstrip the current capacity of Perkins. In order to bring the innovations that this discretionary grant funding intends to foster to scale, we encourage the Administration to seek increased appropriations for Perkins V via the Congressional budget and appropriations process.

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

Sincerely,

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