

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 Meaningful Learning Opportunities (Docket ID ED-2025-OS-0680)

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 Meaningful Learning Opportunities.

Our organizations applaud the Department's proposal to use discretionary grant funding to support learning opportunities that are meaningful and relevant for students' education and career goals. As organizations dedicated to ensuring all learning is contextualized and impactful, we appreciate the opportunity to share feedback on this proposed priority.

Positioned at the intersection of education and workforce development, state and local CTE systems have the expertise to facilitate meaningful learning opportunities for not only CTE students but for all learners. For this reason, we encourage the Department to prioritize proposals that build on CTE's existing infrastructure for developing integrated learning experiences across academic and technical knowledge and skill areas, across learner levels, and across wider education and workforce systems.

CTE facilitates meaningful learning opportunities from early in a learners' educational journey, including middle grades career exploration and advising that helps students identify their education and workforce goals, chart a pathway to meet those goals, and begin to develop a career identity. Middle school students who participate in career exploration are more likely to report being engaged in school and to practice in-demand

workplace skills.¹ The most recent iteration of the Carl D. Perkins Career and Technical Education Act (Perkins V) enables funds to be spent down to grade five, but this aspect has not yet been fully realized in many states and local communities due to persistent federal resource constraints.

CTE is also the backbone of work-based learning and industry credential attainment in many states and localities, supported by uses of funding and accountability measures under Perkins V that incentivize these experiences. For instance, in 2022-23², in the 21 states/territories that leverage the attainment of recognized postsecondary credentials for Perkins V's secondary program quality indicator, about 400,000 students met this measure. And in the 29 states/territories that similarly use work-based learning participation to measure secondary CTE program impact, about 215,000 learners met this measure.

In addition, 116,000 secondary CTE concentrators across 12 states/territories attained college credit in CTE programs. Research consistently shows students who participate in CTE dual enrollment are more likely to graduate from high school, enroll in college, and earn a postsecondary credential.³ CTE courses and experiences also integrate academic and technical learning, resulting in higher performance⁴ on standardized math assessments and community college math placement tests. These findings are directly aligned with other supplemental grant priorities that have been put forward by your Department this year.

CTE is also a proven pathway to success for students with disabilities. Students with disabilities in CTE programs are more likely to graduate on-time,⁵ earn industry-recognized credentials,⁶ and be employed full-time after high school than their peers.⁷

To ensure this grant funding has the largest impact for learners, we encourage the Department to prioritize projects that incorporate multiple strategies listed under this priority. A multipronged approach that integrates advising, academic and technical

¹ [Efficacy and Innovation in Middle School Career Exploration: Proven Models for Student Success; Harnessing Opportunity: The Case for Career-Connected Learning in Middle School](#)

² [OCTAE Perkins Data Explorer](#)

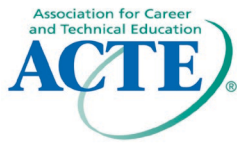
³ [CTE-Focused Dual Enrollment: Participation and Outcomes, Annenberg Institute for School Reform at Brown University](#)

⁴ [SREB NRCCTE Math-in-CTE Resources](#)

⁵ [Graduation, College, and Employment Outcomes for CTE Students with an Identified Disability Report - Georgia Policy Labs](#)

⁶ [\(PDF\) The Impact of Career and Technical Education on Students With Disabilities](#)

⁷ [ERIC - EJ1093654 - Causal Effects of Career-Technical Education on Postsecondary Work Outcomes of Individuals with High-Incidence Disabilities, Exceptionality, 2016](#)



content, and other experiences that bridge learner levels and education and workforce systems will serve learners best. We also suggest that the Department give greater weight to projects and applications that incorporate rigorous accountability measures already used by states and local providers under Perkins V.

This supplemental grant funding offers opportunities to increase access to meaningful learning experiences for CTE students and for all learners. However, to bring these experiences to scale, we encourage the Administration to also seek increased appropriations for Perkins V – which remains the smallest federal investment of the four major education and workforce programs regularly updated by Congress across K-12, higher education, and workforce development – 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,

LeAnn Curry
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