



April 2, 2026

Kirsten Baesler
Assistant Secretary for Elementary and Secondary Education
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Proposed Priorities, Requirements and Definitions: Comprehensive Centers Program (Docket ID ED-2026-OESE-0364)

Dear Assistant Secretary Baesler,

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 representing 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 March 3 requesting comments on proposed priorities, requirements, and definitions for the Comprehensive Centers Program (Docket ID ED-2026-OESE-0364).

We appreciate the opportunity to provide input and applaud the Department's intent to ensure the Comprehensive Centers Program is effectively fulfilling its purpose to support agencies and institutions while centering state and local education leaders as the primary voice driving the program's technical assistance work and priorities.

Our comments are focused on the third proposed priority regarding field-initiated and emerging need content centers. We recommend that the Department, in line with Secretary McMahon's [supplemental priorities](#), prioritize proposals focused on quality and implementation of CTE coursework, work-based learning, and other aspects of college and career readiness to help state and local education leaders scale high-quality programs and experiences that prepare learners for further education and the workforce.

Evidence [demonstrates](#) that CTE is associated with higher levels of student engagement and academic achievement. CTE courses are academically rigorous and increasingly fulfill wider academic coursework requirements, such as in [Texas](#) and [Utah](#), helping students accelerate their learning journey. In addition, CTE learners are also [more likely](#) to graduate high school and enroll in a two-year college.

Through CTE programs, students are connected with work-based learning, industry credentials, dual enrollment, and other rigorous and industry-relevant opportunities. For example, [in 2023-24](#), nearly 434,000 secondary CTE concentrators earned recognized postsecondary credentials such as industry certifications and postsecondary certificates across 22 states, while 236,000 participated in work-based learning across 29 states. CTE is also increasingly

integrated with earn-and-learn experiences like [youth apprenticeships](#), [pre-apprenticeships](#) and [Registered Apprenticeships](#) and data has demonstrated that CTE skills and credentials can [lead to higher wages](#).

CTE is also a pathway to success for students with disabilities. Through CTE programs, these students are more likely to [graduate on-time](#), earn [industry-recognized credentials](#) and be [employed after graduation](#). Other learner groups, including [low-income students](#) and [male students](#), experience positive returns from CTE as well.

Despite the proven effectiveness of CTE, there are still challenges in ensuring all students have access to high-quality programs. Persistent resource constraints, CTE teacher shortages, and challenges engaging employer partners for work-based learning are examples of the types of issues holding CTE programs back from scaling up high-quality, industry-aligned educational experiences. Targeted technical assistance from the Department through the Comprehensive Centers Program can help states and local leaders address these barriers and expand career pathways for a greater share of America's students.

Among CTE-related issues that could be given priority, we recommend the Department focus on the following (non-exhaustive) topics:

- CTE curriculum that aligns classroom instruction with industry standards and prepares students to earn credentials of value
- Recruiting and retaining CTE teachers and providing effective professional development opportunities
- Innovative CTE funding strategies for items that generally cannot be supported with federal Carl D. Perkins Act funding, including paid work-based learning opportunities, student transportation needs and more
- Career navigation supports that inform students of available education and training opportunities, including connected advising systems and online navigation platforms
- CTE partnerships with employers in high-demand sectors that connect students with work-based learning experiences

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 Federal Policy Advisor Steve Voytek (svoytek@careertech.org).

Sincerely,



LeAnn Curry
Executive Director
ACTE



Kate Kreamer
Executive Director
Advance CTE