

**Secretary's Proposed Supplemental Priorities and Definitions for  
Discretionary Grant Programs**

**Docket ID - ED-2013-OII-0146**

July 24, 2014

The Honorable Arne Duncan  
Secretary of Education  
Lyndon Baines Johnson Building  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Secretary Duncan:

The Association for Career and Technical Education and the National Association of State Directors of Career Technical Education Consortium submit the following comments in response to the *Federal Register* notice published June 24, proposing priorities and related definitions for use in discretionary grant programs.

***Proposed Priority 1—Improving Early Learning and Development Outcomes.***

***Recommended Change:***

(b) Improving the quality and effectiveness of the early learning workforce so that early childhood educators have the knowledge, skills, and abilities necessary to improve young children's health, social-emotional, and cognitive outcomes, **such as through the development of career and technical education programs of study.**

As pointed out in the proposed priorities, high-quality early learning experiences have positive and lasting impacts for children. The qualifications and skills of staff in these programs make critical contributions to creating the experiences necessary for young students' success, and are rightly included as a part of this priority area. It is important to recognize the many career and technical education (CTE) programs of study around the country that are building pathways for students into early-learning careers—these programs should be supported and replicated to ensure an early childhood workforce with the appropriate knowledge, skills and abilities. With a growing focus on “high-demand” occupations and STEM fields within CTE, adding language to this priority to reference the need for programs focused on the country's future educators will help ensure that this important opportunity area is not overlooked within CTE program development.

## ***Proposed Priority 2—Influencing the Development of Non-Cognitive Factors.***

### ***Recommended Change:***

Projects that are designed to improve students' mastery of non-cognitive skills and behaviors (e.g., academic behaviors, academic mindset, perseverance, self-regulation, social and emotional skills, **career readiness skills**, and approaches toward learning strategies) and enhance student motivation and engagement in learning.

A wide variety of non-cognitive factors are essential to ensuring students are able to attain the skills necessary for success in school, career and life. While all of the factors included in the proposed priority are certainly critical, one important area is missing: career readiness skills. The National Career Readiness Partner Council, a group of leaders from national education and workforce organizations formed in 2012, defines a career-ready person:

A career-ready person effectively navigates pathways that connect education and employment to achieve a fulfilling, financially-secure and successful career. A career is more than just a job. Career readiness has no defined endpoint. To be career ready in our ever-changing global economy requires adaptability and a commitment to lifelong learning, along with mastery of key knowledge, skills and dispositions that vary from one career to another and change over time as a person progresses along a developmental continuum. Knowledge, skills and dispositions that are inter-dependent and mutually reinforcing.

Employability knowledge, skills and dispositions are a key part of the non-cognitive side of career readiness, such as career awareness, goal setting and the ability to manage transitions from school to work and back again, and from one occupation along a career pathway to another.

## ***Proposed Priority 3—Promoting Personalized Learning.***

### ***Recommended Change:***

Projects that are designed to improve student ~~academic~~ outcomes and close ~~academic~~ opportunity or attainment gaps through one of the following:

- (a) Implementing personalized learning (as defined in this notice) approaches that will ensure appropriate support and produce ~~academic~~ excellence for all students.
- (b) Awarding credit or digital credentials (as defined in this notice) based on personalized learning or adaptive assessments of ~~academic~~ performance, cognitive growth, or behavioral improvements and aligned with college- and career-ready standards.

As emphasized in the priorities background, personalized learning is a critical component of ensuring all students master the content and skills required for college- and career-readiness. While true college and career readiness requires varying mixes of

academic, technical and employability knowledge and skills, this priority limits the use of personalized learning to focus solely on academic outcomes. We suggest removing references specifically to academic outcomes and focusing more generally on student outcomes to ensure efforts can be applied across a wide range of education programs. For example, personalized learning might be a particularly useful strategy in adult career pathway programs focused on employment outcomes.

***Proposed Priority 6—Improving Job-Driven Training and Employment Outcomes.***

***Recommended change:*** Projects that are designed to improve job-driven training and employment outcomes through a focus on one or more of the following:

- (a) Increasing employer engagement (as defined in this notice).
- (b) Providing work-based learning opportunities (e.g., Registered Apprenticeship, other apprenticeships, internships, externships, on-the-job training, co-operative learning, practica, and work experience) ~~for low-skilled adults (as defined in this notice) or other high-need students (as defined in this notice).~~
- (c) Integrating education and training into a career pathways program or system that offers connected education and training, related stackable credentials, and other support services that enable ~~low-skilled adults (as defined in this notice) or other high-need students (as defined in this notice)~~ **students** to secure ~~industry-relevant certification~~ **industry-recognized credentials** and obtain employment within an occupational area with the potential to advance to higher levels of future education and employment in that area.
- (d) Providing labor market information, career information, advising, counseling, job search assistance, and other supports including performance-based or other income supports or stipends, transportation and child care assistance and information, or others as deemed appropriate.
- (e) Improving the knowledge and skills of **instructors**, personnel and service providers that will enable such providers to better assist their **students and** customers to obtain the competencies and job skills required in the competitive labor market.

The addition of this priority, focusing on education and training aligned to labor market needs, is a positive step that recognizes the important role of the federal government in supporting and growing such opportunities for students. CTE programs, particularly programs of study authorized under the Carl D. Perkins Career and Technical Education Act, are a key component of the country's ability to provide job-driven training. ACTE and NASDCTEc have just a few minor changes to the proposed priority to ensure all students can benefit from high-quality CTE linked to employer needs.

First, we recommend removing the language referencing some of the strategies of the priority as only being appropriate for high-need or low-skill students. Many different students, including those who may not fit the definitions included in this notice, can benefit from work-based learning and integrated programs of study. Limiting the

populations served by these activities could result in narrow programs that do not result in systemic change across educational institutions or training programs.

Second, we recommend replacing the term “industry-relevant certifications,” which has limited meaning within the education and training community, with the more general and all-encompassing term “industry-recognized credentials,” which includes certificates, certifications, licenses and degrees that have labor-market value.

Finally, we suggest adding references to instructors and students to the final part of the priority to ensure that professional development for both secondary and postsecondary teachers is included to help meet this goal.

***Proposed Priority 7—Promoting Science, Technology, Engineering, and Mathematics Education.***

***Recommended change:***

(b) Providing students with increased access to rigorous and engaging STEM coursework and authentic STEM experiences (as defined in this notice), **such as through the development and implementation of STEM-related CTE programs of study.**

(c) Identifying and implementing instructional strategies, systems, and structures that improve postsecondary learning and retention, resulting in completion of ~~an degree~~ **industry-recognized credential** in a STEM field.

CTE programs of study integrate STEM concepts, and can help students become more STEM literate through applied learning, authentic experiences and other techniques that engage and motivate students. These courses also integrate active career exploration and career advising to increase understanding of the breadth of postsecondary and employment options that have a relationship to STEM, and provide varied pathways that can lead to those careers. For these reasons, we believe it is important that Proposed Priority 7 specifically reference CTE programs of study as an option for meeting this priority and further emphasize that traditional core academic courses are not the only way to provide rigorous STEM programming.

In addition, it is important to include preparing students for the broad range of STEM-related in-demand careers, not just those requiring postsecondary degrees. Recent research has shown that there are many viable STEM careers requiring postsecondary certificates or industry certifications, and this priority should broadly focus on “industry-recognized credentials.”

*Proposed Priority 8—Implementing Internationally Benchmarked College and Career-Ready Standards and Assessments.*

*Recommended Change:*

Projects that are designed to support the implementation of and transition to internationally benchmarked college- and career-ready standards and assessments **across subject and skills areas**, including projects in one or more of the following:

ACTE and NASDCTEc applaud the inclusion of college- and career-ready standards in the Department's proposed priorities. However, the common college- and career-ready standards referenced in the background of the notice only include the academic knowledge and skills students need to succeed in English language arts and mathematics. There are additional standards that students must meet if they are to be truly career-ready. Career readiness involves both academic and technical knowledge and skills in a broad range of subject areas, as well as employability knowledge, skills and dispositions. Language should be added to the priority to allow for a more inclusive set of standards to be considered for implementation.

Finally, we would also like to acknowledge and support the recommendations made by the Workforce Data Quality Campaign (WDQC), of which we are both founding members. The WDQC recommendations will help to ensure that the use of data throughout federal programs is consistent and aligned.

Thank you for the opportunity to provide comments on these important priorities. If we can provide any additional information or answer any questions, please contact Alisha Hyslop, ACTE director of public policy, at 703-683-9331 or [ahyslop@acteonline.org](mailto:ahyslop@acteonline.org); or Steve Voytek, NASDCTEc government relations associate, at 240-398-5406 or [svoytek@careertech.org](mailto:svoytek@careertech.org).

Sincerely,



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