



April 4, 2022

The Honorable Robert Scott
Chairman
House Committee on Education & Labor
Room 2176, Rayburn House Office Building
Washington, D.C. 20515

The Honorable Virginia Foxx
Ranking Member
House Committee on Education & Labor
Room 2101, Rayburn House Office Building
Washington, D.C. 20515

The Honorable Frederica Wilson
Chair
Higher Education and Workforce Investment
Subcommittee
Room 2176, Rayburn House Office Building
Washington, D.C. 20515

The Honorable Mariannette Miller-Meeks
Ranking Member
Higher Education and Workforce Investment
Subcommittee
Room 2101, Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Scott, Ranking Member Foxx, Rep. Wilson, and Rep. Miller-Meeks,

On behalf of 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 and 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, we are writing in response to the recent release of H.R. 7309—legislation that would reauthorize the Workforce Innovation and Opportunity Act (WIOA).

Our organizations believe that WIOA reauthorization provides a significant opportunity to thoughtfully reassess the nation's federally-funded workforce system. A comprehensive update to this law should seek to more effectively ensure that learners of all ages can access the education, training, and support services necessary to secure family-sustaining employment. Toward these important goals, we are encouraged to note the following provisions and elements in this proposal that would begin to address this, including:

- A significant improvement to the law's requirements regarding the sharing of one-stop center infrastructure costs which would dramatically reduce administrative burden on workforce development stakeholders, including postsecondary CTE. We believe that this issue in particular can be further strengthened as this legislation continues to be refined as part of the ongoing legislative process.
- A strong commitment to equity that is identifiable throughout the draft which, among many other laudable changes, aims to recruit and develop a more diverse workforce, expand the provision of supportive services to underserved populations, broaden the concept of nontraditional employment, and expand the definition of barriers to employment to more holistically account for the underlying reasons why some individuals and groups remain chronically unemployed and underemployed.

- The codification of the Workforce Data Quality Initiative Grant program, including significant newly proposed funding for these efforts which would enable stakeholders to link existing P-20W data systems and make better use of information produced and collected within the workforce system. Additionally, we were encouraged to note efforts to allow for a publicly-administered data system to facilitate better data linkages and other similar initiatives nationally.
- The inclusion of provisions that more thoughtfully and equitably help stakeholders determine the “split” of WIOA Youth funding, including required CTE consultation as part of this process. We are also encouraged to note the full transferability of funding between the Summer and Youth Employment program and wider Youth workforce activities to better account for much-needed state and local flexibility.
- The broadening of “foundational skill needs” to include, for the first time, skills needed in the modern workplace including digital literacy, financial literacy, and interpersonal communication competencies.
- The newly envisioned consultative role state Perkins Eligible Agencies would have in the development of a WIOA Unified State Plan, including encouraging (but not mandating) coordination and alignment of CTE, higher education, and secondary education to achieve the state’s vision for workforce development.
- Use of common terminology from the Carl D. Perkins Career and Technical Education Act (Perkins V), including CTE programs of study and the usage of definitions for “Perkins Eligible Agency” and “work-based learning.”

Importantly this list is not exhaustive and we were encouraged to also note many other positive elements present in this proposed legislation. This includes certain improvements to state and local Eligible Training Provider processes and procedures, particularly by ensuring these efforts do not inhibit consumer choice. At the same time, we believe some of the requirements placed on training providers may prove difficult to implement and may create new reporting and administrative burdens that limit providers’ willingness to engage with the federally-funded workforce system. We suggest providing additional state and local discretion to address these concerns. Increased state and local flexibility will help stakeholders find the right balance between ensuring training experiences are quality, while also providing equitable access for those most in need of training and supports.

At the same time, however, our organizations remain concerned about the lack of required CTE stakeholder representation on state and local workforce development boards (WDBs). Given the significant degree of alignment to the workforce system that is now required in Perkins V, especially in light of the fact that WIOA stakeholders are required as part of state and local CTE systems, we strongly believe and recommend that future WIOA legislation ensure these efforts are reciprocated. This necessarily begins by ensuring CTE has a proverbial seat at the table. We therefore strongly urge future WIOA legislation to explicitly require CTE representation within state and local workforce boards.

Additionally, we were disappointed to see a narrowing of the underlying definitions for eligible youth populations. We believe that these definitions are unnecessarily restrictive and will inhibit, rather than enhance, coordination between CTE and WIOA-funded programs and services, and may even counter other positive changes in this section of the law. To address this we recommend that eligible youth populations be broadened to include those that are “at-risk” as defined in the Every

Student Succeeds Act. Alternatively or in conjunction with this suggestion, we further recommend that all components of current law's description of eligible in-school youth be maintained as part of the definition of eligible youth, so that interventions and services can be provided before youth become fully disconnected from education and/or training.

Finally, we would also like to see future WIOA legislation go further in recognizing the important role virtual services play in the wider skills development ecosystem. For over two years as a result of the pandemic, the workforce system has been able to provide virtual services that deliver results for individuals. We are concerned about language in this proposal that would require virtual services provided by one-stops and affiliate partners to exceed services that are provided in-person. We believe that virtual services should be required to provide the same standard of quality that is expected of in-person services in acknowledgement of new post-pandemic realities.

Advance CTE and ACTE greatly appreciate your continued work to make updates to this important legislation. We remain committed to working with you and your colleagues throughout the wider legislative process to build upon this proposal and refine it further to fully meet the needs of learners, workers, and employers. Should you have any questions or would like to discuss aspects of this letter further, please do not hesitate to contact ACTE's Manager of Government Relations, Zach Curtis (zcurtis@acteonline.org) or Advance CTE's Policy Advisor, Steve Voytek (svoytek@careertech.org).

Sincerely,



Kimberly A. Green
Executive Director
Advance CTE



LeAnn Wilson
Executive Director
ACTE