

TO: The Biden-Harris Transition Team
FROM: Advance CTE
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RE: CTE policy recommendations for economic recovery and innovation

Advance CTE is pleased to congratulate President-elect Joe Biden and Vice President-elect Kamala Harris on the election result. We are grateful to hear of President-elect Biden's discussion about commitment to restoring the dignity of work. We share in this goal. Communications research tells us that when given a description of high-quality Career Technical Education (CTE), parents and learners believe in its power and promise.ⁱ And yet misunderstandings and long-held stigmas persist. The Biden-Harris Administration can be a powerful ally, using your platform, voice and visible leadership to erode these stereotypes and instead shine a light on the critical front-line workers needed in our country, including those in the health care, manufacturing and transportation sectors, many of whom found their chosen occupation – and self-sufficiency – through a CTE program of study. CTE can be a powerful lever for getting more Americans to regain the dignity of work. We hope Advance CTE and your Administration can work together to lift up CTE and the dignity of work.

Make CTE a Central Part of the Administration's Economic Recovery Strategy

With millions of Americans unemployed, Black and Latinx workers, workers with a high school education or less and female workers have been disproportionately negatively impacted.ⁱⁱ A significant number of learners of all ages need fast but quality upskilling and reskilling through avenues such as short-term programs that will result in a living-wage in an in-demand career. CTE is vital to achieving an equitable economic recovery because of its proven track record. The postsecondary completion rate is nearly doubled for learners in CTE programs (close to 57 percent) compared to all two-year institutions (29 percent). Eight-six percent of adult CTE learners continue their education or are employed within six months of completing a program.ⁱⁱⁱ After the last recession, the majority of new or replacement jobs went to employees with more than a high school diploma, including 3.1 million jobs that went to those with an associate's degree or postsecondary certificates.^{iv} Through CTE, displaced workers can upskill and reskill efficiently and prepare for reentry into the workforce. Below are policy concepts to help position CTE as part of the economic recovery strategy:

- **Establish a modern conservation corps to address the nation's infrastructure and environmental priorities**
Getting people back to work is essential to restoring our nation's economic footing and ensuring future prosperity. At the same time, our country's physical infrastructure – bridges, roads, school buildings, etc. - is crumbling and needs significant investment. We know that infrastructure and our environment are inextricably linked. Building on the ideological framework of the Civilian Conservation Corps, we can help Americans get back to work and attend to our nation's most urgent infrastructure and environmental priorities at the same time. A modern version of this program could help millions of youth get their first-ever work experiences, provide adults with skills to secure pathways to self-sufficiency and attend to the

urgent needs of our country and planet. Through a partnership between the U.S. Department of Education and the U.S. Department of Interior, with grants going to each state that prioritize low-income and underserved communities, this program can give millions of Americans the chance at real-world, hands on learning and earning, while making valuable contributions to their community and country.

- **Invest in postsecondary partnerships that prepare for career pathways in high-growth, in-demand industry sectors**

Building off of the successful Obama Administration Trade Adjustment and Assistance Community College and Career Training (TAACCCT) program, an updated version of TAACCCT can be a powerful kickstart to economic recovery by leveraging and investing in our nation's most nimble and responsive postsecondary institutions – community and technical colleges and area technical centers.^v TAACCCT did not include area technical centers as eligible institutions. However, forthcoming research finds nearly 1,400 of these institutions in 39 states, many of which offer short-term credential programs for adults. Any program designed to get Americans back to work quickly should include this network of institutions.

A revamped TAACCCT-like program should be administered through the U.S. Department of Education and can be part of the reauthorization of the Higher Education Act (HEA) or a standalone program. Similar to the original TAACCCT program, targeted investments for partnerships focusing on local, regional or state high-growth, in-demand occupations and industry sectors such as manufacturing, infrastructure and clean energy should be prioritized. States, specifically the Perkins eligible agency, must be a required partner in the grants to ensure equitable scaling of the program's outcomes.^{vi} Further, the grants should be allowed to offset costs for essential supportive services that may be necessary to enable an individual to participate and succeed in the program. Support services may include academic and career advising services, child-care services, stipends to offset housing or food insecurity, transportation subsidies, etc.

- **Expand Pell Grant eligibility to short-term programs**

An update to the current program length requirements for learner financial aid eligibility under Title IV of the Higher Education Act (HEA) will provide necessary support for the millions of Americans who need short-term credentials to upskill or reskill and get back to work. Short-term postsecondary programs typically lead to a postsecondary credential that often has a more immediate connection to an occupational skill or competency than most associate or baccalaureate degree programs and are frequently offered at a substantially lower cost to learners.^{vii} In fact, earning a short-term (less than six months) non-degree credential is associated with a four to seven percentage point increase in the likelihood of being employed.^{viii} Despite this, postsecondary learners enrolled in many short-term education and training programs are ineligible to access federal financial aid due to HEA statutory restrictions.

This proposed expansion of federal financial aid should only include the credentials that lead to self-sufficiency and a livable wage. Therefore, we recommend looking to The Jumpstart Our Businesses by Supporting Students (JOBS) Act (S. 839/H.R. 3497) as model legislative language, as it proposes opening Pell Grants to high-quality short-term programs that meet local or regional labor market needs, articulate to institutional credit and provide a recognized

postsecondary license, certification or credential. The requirements and guardrails in the JOBS Act are a positive example to follow. Expanding Pell Grant eligibility to include short-term programs that can lead to a recognized postsecondary certificate, license or credential is an essential step to leveling the field for learners of all backgrounds during and after a period of economic recovery.

- **Invest in rapid credentialing for equitable access to in-demand, high-wage and high-skill occupations**

To quickly help Americans upskill or reskill and get back to work, forthcoming coronavirus stimulus packages must include a U.S. Department of Education-administered formula grant program to states to provide for rapid credentialing. Through this program, states would distribute funds to community and technical colleges and area technical centers to develop or increase capacity of one to eight-week credential programs that lead to an in-demand short-term certificate or industry recognized credential. There must be a concerted effort to increase postsecondary skill and credential attainment and we must ensure that any approach is rooted in equitable access to in-demand, high wage, high skill occupations. Supporting postsecondary skill and credential attainment is also an equity issue as Black and Latinx learners are more likely to be overrepresented in certificate and associate's degree attainment and it is also known that those with certificates and associate's degrees have greater earning potential and potential for career advancement compared to those with just a high school diploma.

Invest in Innovative CTE Programs and Supports During COVID-19

CTE delivers real-world skills and hands on learning, and COVID-19 (coronavirus) has challenged these system hallmarks. But in challenge lies an opportunity to take the barriers to CTE implementation and invest in new strategic supports. The pandemic has exacerbated already existing gaps in education delivery, particularly for Black and Latinx learners, rural and urban regions and low-income individuals. Targeted and intentional investments are needed to provide equitable access to high-quality CTE programs that are driven by data and individual learner needs. Below are policy concepts to invest in innovative strategies that will push for high-quality CTE during and after the pandemic:

- **Invest in Internet Access and Technology Devices**

The pandemic has laid bare the inequities in our digital infrastructure. Given how much instruction shifted to virtual or hybrid models, this digital infrastructure is the foundation of educational delivery. In August of 2020, it was estimated that more than half of U.S. elementary and high school students study virtually. The rates for postsecondary education are even higher.^{ix} A robust investment is imperative to ensuring equity in access to high-quality virtual education and remote work-based learning opportunities, including expanded high-speed Internet access and technological devices.^x An estimated more than 8 million households do not have access to high-speed broadband.^{xi} An efficient and immediate response to the crisis of the lack of Internet for learners and instructors is a significant investment in the Federal Communication Commission's (FCC) long-standing E-rate Program. Targeted funds are necessary to ensure each individual has the Internet and technological device required to access online education programs. A report from Common Sense Media, based on data from 2018, found that at the secondary level alone thirty-five percent of Native American learners, thirty percent of Black learners and twenty-six percent of Latinx learners had insufficient Internet access

compared to eighteen percent of White learners. Further, thirty-seven percent of rural and twenty-one percent of urban learners do not have Internet access in their home.^{xii} Without this investment, there will be significant gaps in access and enrollment, academic achievement and college and workforce preparedness for those who have already been underserved.

- **Redesign our nation’s labor market information systems into a coordinated, transparent, accessible and forwarding looking real-time talent and labor market information system**

The world of work is changing rapidly, and the rate of change is only accelerating and complicated by the ongoing pandemic and its disproportionate impact on some industry sectors. The World Economic Forum found that automation is estimated to displace 75 million workers but create 133 million jobs globally by 2022. McKinsey found that “by 2030, up to thirty to forty percent of all workers in developed countries may need to move into new occupations or at least upgrade their skill sets significantly.^{xiii} Research further suggests that skilled workers in short supply will become even scarcer.”^{xiv}

We need to modernize our infrastructure for predicting labor market needs, thus allowing education and workforce systems to proactively pivot programs, start new programs or retire obsolete programs. Further, learners and workers need better and more transparent, reliable and real-time information on career opportunities, earnings, and how their educational decisions will interact with access to support services (e.g. Temporary Assistance for Needy Families, Supplemental Nutrition Assistance Program, Child Care Development Fund Subsidies, etc.). Some private companies that have developed robust real-time labor market information platforms with granular-level data, but these can be expensive, thus unintentionally exacerbating inequity among communities and populations that need the support the most. There are some publicly funded, innovative efforts that have been made to establish interactive benefits cliffs dashboards, but these are limited.^{xv} This information – real-time labor market data and benefits’ cliffs dashboards - needs to be accessible to every American in order to make the best-informed decisions.

There must be a significant reimagination and investment to modernize the publicly funded labor market information services and offices, currently managed out of the U.S. Department of Labor. We need robust, publicly supported and available real-time labor market information systems, that collaborate with and aggregate and integrate information and data from other federal agencies such as the U.S. Department of Education (e.g. college scorecards) and agencies that provide benefits such as the U.S. Department of Health and Human Services into a transparent, accessible and forwarding looking talent and labor market information system. This type of transparent data system would afford individuals the information needed to make the academic and career decisions that best fit their goals, as well as enable state and local leaders to align programs to real-time labor market demands.

- **Host a national innovative design challenge to rapidly build out “lifeboat” career pathways for dislocated and unemployed workers**

Burning Glass proffers that “*there are jobs that can serve as ‘lifeboats’ for at least some of those who have lost work and that require little or no retraining; and, there are pathways from these lifeboat jobs and from jobs lost in the pandemic into roles with decent pay and a solid future.*”^{xvi} This life boating concept can serve as one foundation to help reimagine and redesign career

pathways in an equitable, adaptable manner. A national innovation design challenge that brings together innovators from industry, labor and education (including CTE), for a series of design studios to rapidly build out “lifeboat” pathways. In addition to actually creating “lifeboat” pathways, the design studios would build capacity and will to reimagine and implement these new pathways. Well-designed career pathways help learners and workers navigate their acquisition of skills, competencies, work-based experiences and credentials of value. Yet most career pathways have been constructed linearly, designed to be vertically “stackable.” This presumes talent pipelines and transference of skills within an industry sector. The economy our country is facing and the future of work require reconsideration of entire industry sectors. We need new solutions and pathways to help workers determine how to upskill, reskill or transfer and enhance skills into new industries that offer opportunities and pathways to self-sufficiency.

Provide Statutory Flexibilities and Waivers During COVID-19

Due to the coronavirus, the CTE community is seeking several statutory waivers and flexibilities for the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) to ensure efforts and resources are appropriately adapted and focused on serving learners under these unique and trying times. The following flexibilities for Perkins V are necessary for as long as the pandemic dictates, and are not requests for permanent statutory change:

- **The Perkins eligible agency must have the same flexibilities as those afforded to the state education agency (SEA)**

In the majority of states, the SEA is the same as the Perkins eligible agency. However, in 14 states (CO, HI, ID, IN, KS, LA, MN, MT, ND, OK, WA, WI, WV and Guam) the Perkins eligible agency is not the SEA, which means that when stimulus legislation or the U.S. Secretary of Education provides flexibilities to the SEA, CTE programs (which are all administered through the Perkins eligible agency) are excluded. For example, the Coronavirus Aid, Relief, and Economic Securities (CARES) Act authorized SEAs to submit a waiver for section 421(b) of the General Education Provisions Act (GEPA), or what’s more commonly known as the Tydings Amendment. This gave flexibility for the period of availability of Perkins funds, and allowed funds to be carried over in the following fiscal year. However, the 14 states that do not administer Perkins funds through the SEA were ineligible for this waiver.

- **Allow states and local eligible recipients to carryforward funds across academic and fiscal years**

Throughout the pandemic many districts and institutions had planned to use funds for activities that are no longer possible due to the coronavirus. Allowing local eligible recipients to carryforward funds across academic or fiscal years will enable strategic uses of federal resources to support learners and instructors during these uncertain times, such as enabling assessments for industry recognized credentials to be administered during the summer due to disruption in during the school year. This can be done by providing the Secretary of Education the authority to waive Perkins V Section 133(v) for one year.

- **Offer flexibility in reporting and adjusting previously determined state performance levels given disruptions in assessments and data collection**

The pandemic has changed data reporting ability for measures such as enrollment and

assessments, leading to inherent barriers in meeting the previously determined performance levels. When the pandemic came to the forefront, States were granted waivers for delivery of Every Student Succeeds Act (ESSA)-required assessments. There are Perkins V secondary performance measures that are linked to these ESSA academic assessments. If a State does not meet at least ninety percent of any of the core indicators of performance, that state must implement an improvement plan. An improvement plan can impact the Perkins federal funding that goes to the Perkins eligible agency. Additionally, when a state is on an improvement plan it is unable to change performance targets- so if a state could not meet performance targets because of data collection limitations during the pandemic, they must be able to change the performance targets before not meeting those goals and going into an improvement plan. The performance levels were determined with stakeholder input from education and workforce representatives. The unexpected changes that all of those groups are now encountering must be taken into consideration. Providing flexibility in reporting and updating state performance levels provides the opportunity to collect the data that is most reflective of the current times without penalizing State and local agencies for the unpredictable disruptions from the pandemic.

- **Grant temporary waivers of supplement not supplant requirements**
Stimulus funding tends to be authorized with few guardrails, to allow State and local entities to respond to the pressing needs of the community. At the same time, State and local budgets are facing significant cuts and shifts due to the pandemic. Therefore, there is the potential to violate supplement not supplant provisions through the reprioritization of State and local budget allocations. A temporary waiver of supplement not supplant requirements would allow for a more seamless coordination of state, local and federal funds.
- **Waive the definition of “professional development” consistent with flexibility already afforded to ESSA**
Widespread professional development is needed to ensure that CTE instructors are able to successfully utilize digital learning tools and platforms. The CARES Act waived the definition of professional development under ESSA, which requires sustained, intensive and classroom focused activities and could limit the ability of educational institutions to quickly train educators on effective distance learning techniques and provide just-in-time support. Since the definition of professional development in Perkins V Section 3(40) is built on the ESSA definition and contains the same restrictions, it should also be waived temporarily.
- **Broaden Perkins V pooling flexibilities across districts and learner levels**
As states and local communities are creating solutions to support high school seniors in securing required credits, clinicals and competencies to successfully complete high school and transition to postsecondary education, flexible collaboration between secondary and postsecondary institutions is necessary. To provide for additional collaboration among the systems the pooling option allowed for in section 135(c) of Perkins, which is currently restricted to only pooling funds for professional development, should be expanded.
- **Ensure maintenance of effort flexibility**
Given the economic downturn and the fiscal burden of the ongoing pandemic on states, states are already experiencing across-the-board cuts, furloughs and prospects for these conditions will worsen. While Perkins V offers temporary maintenance of effort (MOE) waivers, this

sustained downturn may put many states in a position of not meeting their MOE requirements, putting at risk their ongoing Perkins allocation. The U.S. Secretary of Education must institute easy processes for states to secure waivers offered under Section 211(b) of Perkins V and be prepared to provide multi-year waivers, pending the persistence and severity of the economic downturn.

- **Provide flexibility to implementation of the comprehensive local needs assessment (CLNA)**
The CLNA is one of the most significant drivers for quality, equity, innovation and alignment to labor market data in state CTE programs. The CLNA is data-driven and must report information on labor market alignment and student performance data- two categories that are frequently changing in this uncertain time. Each state’s CLNA was created before the pandemic, and so there are inherent challenges to implementing the originally approved state CLNA. Flexibility in CLNA implementation during the pandemic may be necessary to set states and local eligible recipients up for successful data collecting and program improvement.

Thank you for the opportunity to submit this expanded set of ideas for consideration. Building upon this [initial set of recommendations](#), we hope this memo provides you with more details to turn concepts into policy proposals, executive orders and/or 100-day priorities. If we can be of any further assistance, please feel free to reach out to Advance CTE’s Executive Director, Kimberly Green at kgreen@careertech.org or 202-744-8837 (cell) or Meredith Hills, Senior Associate for Federal Policy, mhills@careertech.org or 617-678-0508 (cell).

About Advance CTE: Advance CTE is the longest-standing national non-profit that represents State CTE Directors and state leaders responsible for secondary, postsecondary and adult Career Technical Education (CTE) across all 50 states, the District of Columbia and U.S. territories. With its members, Advance CTE works to transform and expand CTE so that each learner – of any background, age and zip code – is prepared for career and college success through state leadership, advocacy and partnerships.

ⁱ <https://careertech.org/resource/value-and-promise-of-cte-results-from-a-national-survey>

ⁱⁱ <https://www.bls.gov/cps/effects-of-the-coronavirus-covid-19-pandemic.htm>

ⁱⁱⁱ <https://perkins.ed.gov/pims/DataExplorer/>

^{iv} <https://cew.georgetown.edu/wp-content/uploads/Americas-Divided-Recovery-web.pdf>

^v http://s3.amazonaws.com/PCRN/docs/perkins_iv.pdf

^{vi} <https://careertech.org/resource/value-and-promise-of-cte-results-from-a-national-survey>

^{vii} <https://ccrc.tc.columbia.edu/media/k2/attachments/noncredit-education-in-community-college.pdf>

^{viii} <https://www.dvp-praxis.org/wp-content/uploads/2019/07/DVP-PRAXIS-Non-Degree-Credentials-and-Labor-Market-Outcomes.pdf>

^{ix} <https://www.chronicle.com/article/heres-a-list-of-colleges-plans-for-reopening-in-the-fall/>

^x <https://www.cnbc.com/2020/08/11/half-of-us-elementary-and-high-school-students-will-study-virtually-only-this-fall-study-shows.html>

^{xi} <https://www.washingtonpost.com/technology/2020/11/20/biden-congress-broadband-internet/>

^{xii} <https://www.common SenseMedia.org/kids-action/publications/closing-the-k-12-digital-divide-in-the-age-of-distance-learning>

^{xiii} <https://www.mckinsey.com/~media/mckinsey/industries/public%20and%20social%20sector/our%20insights/skill%20shift%20automation%20and%20the%20future%20of%20the%20workforce/mgi-skill-shift-automation-and-future-of-the-workforce-may-2018.pdf>

^{xiv} <https://www.mckinsey.com/business-functions/organization/our-insights/getting-practical-about-the-future-of-work#>

^{xv} <https://www.frbatlanta.org/economic-mobility-and-resilience/advancing-careers-for-low-income-families#:~:text=The%20mission%20of%20the%20Atlanta,businesses%20for%20a%20healthy%20economy.>

^{xvi} <https://www.burning-glass.com/research-project/filling-lifeboats-getting-america-back-work-after-pandemic/>