

June 14, 2018

The Honorable Lamar Alexander Chairman Committee on Health, Education Labor & Pensions 455 Dirksen Senate Office Building Washington, DC 20510 The Honorable Patty Murray Ranking Member Committee on Health Education Labor & Pensions 154 Russell Senate Office Building Washington, DC 20510

Dear Chairman Alexander and Ranking Member Murray:

As a multi-stakeholder organization dedicated to ensuring that every worker in every industry has the skills they need to succeed in today's economy, National Skills Coalition (NSC) writes to encourage the Senate Committee on Health, Education, Labor and Pensions (HELP) to move forward with a timely, bipartisan reauthorization of the Carl D. Perkins Career and Technical Education Act—also known as the Perkins Act.

Today, middle-skill jobs—those that require some education or training beyond the high school level, but not a four-year degree—make up the largest share of the labor market in the United States. However, employers in key industries struggle every day to find qualified workers to fill these jobs. To address this, Congress must pass federal policies aimed at engaging employers in the development of education and training programs and increasing access to high-quality instruction for secondary and postsecondary students.

In 2014, Congress took an important step to align federal workforce and education programs with labor market demands, by passing the Workforce Innovation and Opportunity Act (WIOA). This bipartisan legislation opened the door for states to make greater use of sector partnerships and career pathway models and included higher levels of accountability and outcome data reporting across all workforce programs.

Now is a crucial time for policymakers to build on these efforts and reauthorize the Perkins Act. As the primary federal funding source for secondary and postsecondary career and technical education (CTE) programs, the Perkins Act supports the development of courses that combine academic instruction with occupational skills training – preparing individuals for transition to higher education or the workplace.

State and local career and technical education (CTE) programs cover a range of occupations across numerous career clusters, including construction, health care, information technology, manufacturing and other fields with high concentrations of middle-skill jobs.

In both 2016 and 2017, the House of Representatives passed the Strengthening Career and Technical Education for the 21st Century Act—a comprehensive reauthorization of the Perkins Act that aims to modernize federal CTE policy and align it with other existing workforce strategies, including those contained in WIOA. As the Senate looks to follow suit and consider an overhaul of the Perkins Act, National Skills Coalition offers the following recommendations:

Connect CTE to WIOA state workforce strategies

Under WIOA, the Governor of each state or territory must submit a four-year plan to the Secretary of Labor which outlines a strategy for the state's workforce development system. Currently, the Perkins Act requires states to develop a separate six-year plan for CTE programs—which may limit coordination between CTE and other federally funded workforce programs.

To minimize duplication across workforce development strategies, NSC recommends better aligning state planning requirements under the Perkins Act with the four-year requirement outlined in WIOA. Combined plans should include a description of how CTE programs will be integrated into WIOA core programs, as appropriate, as well as a strategy for ensuring that Perkins Act funds can be utilized in coordination with regional and local WIOA plans.

Align CTE performance requirements with WIOA common indicators

Prior to the passage of WIOA, one of the key challenges to aligning federal education and workforce programs was the lack of common performance metrics across funding streams. The use of differing outcome measures meant that states were often required to collect and report separate employment data for students enrolled in programs funded through multiple sources, creating confusion about performance results and increased administrative burdens.

To begin to address this challenge, WIOA established a set of common performance indicators that generally apply across all core programs. These indicators consist of: employment in the 2nd quarter after program exit; employment in the 4th quarter after program exit; median earnings for program participants in the 2nd quarter after exit;

percentage of participants earning a recognized postsecondary credential or secondary diploma during or within one year of exit from a core program; percentage of participants in education or training achieving measurable skills gains towards a recognized postsecondary credential or employment; and effectiveness of the core program in serving employers.

The Perkins Act currently requires states to establish performance measures for CTE programs that are similar, but not identical, to the performance indicators under WIOA. Maintaining the existence of separate performance indicators, specifically for postsecondary programs, will make workforce development more difficult overall. Therefore, NSC urges the Committee to adopt WIOA common performance measures to postsecondary Perkins Act-funded programs.

Continue to encourage the development and implementation of sector partnerships across programs

One of the most notable provisions in WIOA was the adoption of industry or sector partnerships as a required strategy for workforce development at both the state and local levels. Sector partnerships are formed when multiple employers in an industry choose to collaborate with a range of other stakeholders—including labor unions, workforce boards, academic institutions and other training providers—to develop pipelines of skilled workers. While these collaboration models have long been recognized by the federal government as a best practice, the passage of WIOA marked the first-time sector partnerships were named a required activity under federal law.

CTE program administrators are valuable when it comes to the implementation of sector partnerships—as they can help ensure that students have access to high-quality training which results in the attainment of valuable skills and credentials. NSC encourages the Committee to support sector partnership alignment in two key ways:

- Provide dedicated funding for CTE administrators to participate in a sector partnership in accordance with WIOA;
- Require combined state plans to contain a description of how Perkins Act programs would support state efforts to develop and implement sector partnerships.

Support the use of career pathways

WIOA makes the development of "career pathways" a required activity at multiple levels of the workforce system. The law defines a career pathway as a combination of rigorous and high-quality education, training and other services that help individuals enter or advance in a specific occupation and obtain both a secondary diploma and at least one recognized postsecondary credential.

The Perkins Act currently requires all local educational agencies and postsecondary institutions to provide programs of study that are similar to the career pathways as defined in WIOA, including those that: incorporate secondary and postsecondary education elements; include rigorous content in a coordinated, non-duplicative progression; provide opportunities for secondary education students to gain postsecondary education credits through dual enrollment programs; and offer courses that lead to an industry-recognized credential or certificate, associate degree, or baccalaureate degree. Therefore, CTE program administrators are natural partners for state and local workforce boards to collaborate with on the development and implementation of career pathways.

NSC maintains that a reauthorization of the Perkins Act should aim to clarify that programs of study funded through Perkins should, to the extent practicable, meet the career pathways definition under WIOA, and should be developed and implemented in partnership with local workforce boards. Additionally, NSC encourages the Committee to consider requiring the alignment of career pathways with adult education services under Title II of WIOA—so that participants in these programs are not left out of career pathway strategies altogether. Connecting adults in need of basic skills instruction and other support services with career pathways would help more individuals enroll in middle-skill training and find success in the job market.

Expand and support work-based learning models

Work-based learning — which includes strategies such as apprenticeships, on-the-job training, internships, and others — has been one of the main focuses of federal workforce policy in recent years. WIOA expanded the range of work-based training models that could be used to support adult participants under Title I and mandated that at least 20 percent of WIOA youth funds be used to support work experiences. Although many successful CTE programs incorporate work-based learning as part of their curriculum, the Perkins Act does not currently require administrators to ensure that CTE students have some form of work experience. As a result, many students complete CTE programs without experiencing hands-on training or other scenarios that may help familiarize them with employer expectations.

NSC recommends providing dedicated funding for CTE programs to incorporate workbased learning strategies either directly or through alignment with other programs that provide direct work experience. The law should ensure that any work-based learning activity supported by the Perkins Act complies with federal, state and local worker protections, including applicable wage and hour requirements, and should permit secondary CTE programs to make use of virtual work experiences when necessary to ensure student safety.

Thank you for your consideration of these recommendations as well as your leadership and dedication to making our nation's federal education and labor policies work for all students. National Skills Coalition looks forward to continuing to work with you throughout the Perkins Act reauthorization process.