



April 23, 2020

Assistant Secretary Robert King
Office of Postsecondary Education
U.S. Department of Education
LBJ Building, 400 Maryland Avenue, SW
Washington, DC 20202

Dear Assistant Secretary King:

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 that represents State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education (CTE) across all 50 states and U.S. territories, we are grateful for your steadfast dedication to providing institutions and students much needed relief during this unprecedented time. Although we appreciate your hard work, we are writing to express concern about the Department's recently released Frequently Asked Questions on the Emergency Financial Aid Grants to Students under Section 18004 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, specifically the Department's decisions related to student eligibility as outlined in question nine.

The explanation of "eligible" students provided in the FAQs will have an extremely harmful impact on many of the students enrolled in CTE programs across our nation's community and technical colleges and area CTE centers. The requirements specifically exclude all students without a high school diploma. This leaves out a wide swath of adult basic education students who are enrolled in programs on college campuses and face the same, if not more, needs as a result of the educational and economic repercussions of the pandemic. Due to the Department's limitations, these students, as well as those who are enrolled in integrated education and training programs and non-credit CTE programs, which often lead to industry-recognized credentials valued in the labor market but are not eligible for federal aid, would be ineligible for this critically needed funding.

The Emergency Financial Aid Grants were created to provide much needed financial relief for students who need it most, and the arbitrary limitations placed on eligibility through the FAQs are in direct conflict with these goals. Non-credit and adult education students are more likely to be non-traditional students, such as adult learners, low-income students, and language minority students. This means they are likely to be working and supporting family members, and facing unprecedented challenges during the transition to remote learning. Aid to these populations should be prioritized, not restricted!

Thank you for your attention to this matter and for your consideration of our concerns. If you have any questions, please feel free to reach out to Kimberly Green, Advance CTE's Executive Director at kgreen@careertech.org or Alisha Hyslop, ACTE's Director of Public Policy at ahyslop@acteonline.org.

Sincerely,



LeAnn Wilson
Executive Director
ACTE



Kimberly A. Green
Executive Director
Advance CTE

CC: Assistant Secretary Scott Stump, OCTAE
Deputy Assistant Secretary Casey Sacks, OCTAE
Deputy Assistant Secretary Christopher McCaghren, OPE