



June 13, 2021

The Honorable Rosa DeLauro  
Chairwoman  
Committee on Appropriations  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Kay Granger  
Ranking Member  
Committee on Appropriations  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Tom Cole  
Ranking Member  
Subcommittee on Labor-HHS-Education  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Chairwoman DeLauro, Ranking Member Granger, & Ranking Member Cole,

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 writing in response to the Fiscal Year (FY) 2022 Labor, Health and Human Services, Education, and Related Agencies appropriations bill that was released this week.

We appreciate the increase of \$50 million for Perkins CTE State Grants and recognize it as a positive step toward addressing the demand for secondary, postsecondary and adult CTE programs. However, this increase alone is not enough to equitably and adequately meet the needs of learners nor ensure employers have a robust and diverse talent pipeline. The funding makes meaningful but insufficient steps toward addressing the historic and chronic underfunding of CTE. We recognize and appreciate that this increase exceeds the President's budget request for CTE State Grants; however, when compared to the overall increase in funding in this bill and the demand for and needs of CTE across the country, the investment in CTE State Grants is disproportionately low. We hope to work with you as the appropriations process moves forward to secure additional investments in CTE.

Relatedly, we have some concerns about the structure of the additional \$100 million provided through new competitive grants for middle and high school CTE innovation. While these funds are certainly needed within the system, as described above, we believe they would be more equitably and effectively used if allocated within an existing funding stream -- ideally the CTE State Grants line item.

Finally, the CTE community is a strong supporter of youth apprenticeship, pre-apprenticeship and apprenticeship programs. Making more intentional connections between CTE and apprenticeships was a priority we advocated for during Perkins reauthorization. Our members are actively making these connections at the state and local levels and have been recipients of National Apprenticeship grants. Unfortunately, language included in the bill to expand the definition of “eligible institution” per section 3(20) to include an apprenticeship program that is registered under the National Apprenticeship Act and accredited by the U.S. Department of Education (ED) is confusing and could have negative and unintended consequences.

- The current definition of an eligible institution is used to distribute the postsecondary portion of Perkins CTE funding. However, the current local distribution formula in Perkins Section 132 is not appropriate for apprenticeship programs, as it is largely based on the number of students eligible for Pell Grants, with funding structures built for public and non-profit private institutions of higher education.
- Perkins funds are designed to improve systems, and requirements throughout the law related to the comprehensive local needs assessment, local application, uses of funds and accountability are all built to apply at the institution level, not to individual programs. Adding single apprenticeship programs as direct recipients of funds is not consistent with the intent of the law or the requirements included throughout for a systems approach to CTE improvement.
- Apprenticeship programs, or particular aspects of programs, may already receive federal CTE funds through partnerships with community and technical colleges or area CTE centers. Many of these partnerships already exist, and could actually be harmed by adding apprenticeship programs as direct recipients of funds that must meet separate requirements.
- Apprenticeship programs are most commonly registered under the U.S. Department of Labor (DOL), as opposed to being accredited by ED. Though the academic part of an apprenticeship program may occur in partnership with an accredited college, that is different from the full program being accredited. As such, the intent of the new language is unclear.

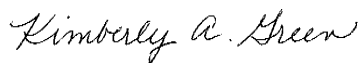
We request that the definition of “eligible institution” be restored to the current statutory definition in Perkins V.

If you have any questions or would like to discuss the needs of CTE further, please contact ACTE’s Government Relations Manager Michael Matthews ([mmatthews@acteonline.org](mailto:mmatthews@acteonline.org)) or Advance CTE’s Senior Associate for Federal Policy Meredith Hills ([mhills@careertech.org](mailto:mhills@careertech.org)).

Sincerely,



LeAnn Wilson  
Executive Director  
ACTE



Kimberly A. Green  
Executive Director  
Advance CTE