

December 11, 2017

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
U.S. House of Representatives
Washington, DC 20515

The Honorable Robert Scott
Ranking Member
Committee on Education and the Workforce
U.S. House of Representatives
Washington, DC 20515

Dear Chairwoman Foxx and Ranking Member Scott:

On behalf of Advance CTE, representing the state and territory leadership for secondary, postsecondary and adult Career Technical Education (CTE), we write to express our views on *The Promoting Real Opportunity, Success, and Prosperity through Education Reform* (PROSPER) Act. As the House Committee on Education and the Workforce works on the reauthorization of the Higher Education Opportunity Act (HEA) (P.L. 110-315), the challenges facing our nation's economy, most notably the skills shortage, must be considered. Our nation's postsecondary education system is an essential part of our nation's workforce and talent development strategy, as well as a hub of critical and innovative research. Today, many employers report a shortage of qualified workers, while university and college graduates burdened with tremendous debt are unable to find work related to their fields of study. With the looming silver "tsunami," federal policy should support a realignment of our nation's postsecondary education policies to be more responsive and reflective of the modern economy and labor market.

We believe that the PROSPER Act takes a step in the right direction toward strengthening the connection between postsecondary education and workforce development, however this support is attenuated by our strong concern that the proposal lacks sufficient and appropriate quality protections that we believe are absolutely essential for all learners to access and realize the full potential of the concepts included in the PROSPER Act. For example, we appreciate that the definition of an institution of higher education encompasses public institutions that offer CTE (e.g., area technical schools, community colleges and postsecondary vocational institutions). However, the change to the definition also includes for-profit institutions, which will allow for these institutions to receive funds via other federal programs, such as through the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins), that have not previously been eligible. We are concerned that without further refinement to this definition, this dramatic shift in eligibility would dilute an already limited investment in CTE to the degree that the funds received would have minimal impact and reach to meaningfully improve these programs and increase equitable access to them, which are the primary purposes of the Perkins Act. Furthermore, it is important to recognize that in connecting postsecondary education to workforce development the federal policy must value all relevant postsecondary options, which include industry-recognized certificates and credentials, two-year and four-year degrees (and beyond) - all of these are part of career pathways. In short, we must not denigrate four-year degrees by lifting up credentials and degrees below this level. Both are important to our nation's prosperity. In fact, we know that by 2020, ["65 percent of all jobs in the economy will require postsecondary education"](#) and training beyond high school and that 35 percent of those job openings will require at least a bachelor's degree" (Carnevale, Smith, & Strohl, 2013, p. 1).

Below are five principles that we believe are crucial to the reauthorization of this important legislation, as well as our comments on how they relate to the PROSPER Act and identified areas of concern.

Postsecondary Education Is Workforce Development:

Strengthen Connections to the Labor Market: While the PROSPER Act includes a measure of median earnings in the proposed College Dashboard, incorporating other labor market outcomes (e.g., those used in the Workforce, Innovation and Opportunity Act (WIOA), including the percentage of students, who, during the second quarter after program completion, are in education or training activities, advanced training, or unsubsidized employment, the percentage of students who receive a recognized postsecondary credential during participation in or within 1 year of program completion) would provide learners with important data they could use to make decisions about which postsecondary option would be best for them. One opportunity to strengthen the connection to the labor market is through the accreditation process. While we are encouraged by the inclusion of the requirement for a representative of the business community to be on the accreditor commission, we are very concerned that the accreditation has been narrowed to singularly focus on the mission of the institution. Most mission statements are so broad that holding a college or university accountable just to this mission provides so much latitude and flexibility that accreditation will essentially become meaningless. Accreditation is a very important consumer protection mechanism; its goal is to ensure that learners are participating in programs that provide quality educational experiences with a strong record of positive outcomes, including labor market outcomes. We believe that minimally, labor market outcomes should be a required element of the accreditation process to act as a mechanism for institutions to have a clear set of policies and process for timely program dissolution or revision when programs no longer meet labor market demand.

Eliminate Barriers to Financial Aid Program Access:

Affirm the Importance of All Postsecondary Credentials: The PROSPER Act's reduction of the program length requirements to allow learners in short-term education programs to be eligible for federal financial aid is a positive step forward; however, it would be irresponsible to proceed with this policy without the inclusion of the consumer protection measures needed to ensure that these programs and the credentials they lead to are of high-quality and confer a positive labor market outcome. We recommend replacing the PROSPER Act's language with that of the JOBS Act, a bill introduced by Senators Kaine (D-VA) and Portman (R-OH); the JOBS Act sufficiently addresses the provisions needed to address program and credential quality (e.g., "eligible career pathway program" is defined, credentials are required to meet employer needs, etc.), thus ensuring learners and employers both benefit.

Reinstate Ability-to-Benefit: The PROSPER Act's reinstatement of the ability-to-benefit provision that recognizes that that learners of all ages, experience levels and backgrounds should have the opportunity to build on their learning and experiences and have them count toward a postsecondary credential. However, we believe it is critical that those learners who participate in ability-to-benefit enroll in a career pathway. Without this requirement, learners may not have access to the career development and advising services which help them make informed choices in how to most efficiently and effectively leverage their postsecondary education into a rewarding career. Furthermore, Advance CTE recommends that this legislation put a greater focus on career development and advising for all learners.

Streamline Data Collection and Ensure Cross-systems Alignment:

Adopt Common Performance Metrics: Programs supported through federal legislation such as HEA, the Workforce Innovation and Opportunity Act (WIOA), the Carl D. Perkins Career and Technical Education Act (Perkins) and the Every

Student Succeeds Act (ESSA), have unique purposes but oftentimes serve overlapping populations. Each law maintains distinctive accountability and performance metrics that, taken together, create a reporting burden for states and institutions while decreasing the value and integrity of the data collected. Advance CTE recommends the creation of common measures, where practical, to align workforce and education programs as well as the adoption of related common terminology and measurement methods. For example, the measure of median earnings that the PROSPER Act includes as part of the proposed College Dashboard does not line up with the median earnings indicator used in WIOA, putting an additional burden on institutions to collect this data at three points in time, which has already proven difficult for many institutions to do for just one point in time. In addition, we are concerned that the proposed College Dashboard does not provide data on learners who are not Title IV eligible. We believe that this data would provide an incomplete picture of learners' outcomes and recommend that the College Dashboard provide data on all learners.

Develop and Expand Statewide Data System Capacity: The ultimate role of postsecondary education is to prepare learners for rewarding careers that promote economic self-sufficiency and align to the nation's talent pipeline needs. To achieve this, a newly reauthorized HEA must be able to hold programs and institutions accountable for the employment outcomes of their students. We are encouraged that the proposed College Dashboard would include data at the program level (a notable shift from providing institution-level data) that will provide learners with more valuable data that they can use to make informed decisions about the postsecondary option that aligns with their career goals. However, the PROSPER Act maintains a ban on federal student level data collection and this restricts the collection of the information necessary to do this and prevents adequate program evaluation of other critical student outcomes. Advance CTE recommends that the PROSPER Act lift this ban and incorporate the provisions outlined in the College Transparency Act. This bipartisan bill that was introduced earlier this year in both the House and Senate lifts this ban and proposes a student level data network that would provide valuable information, while ensuring the necessary privacy protections are kept in place.

Increase Flexibility for Innovative Educational Models:

Promote Competency-Based Learning: Postsecondary CTE programs have been on the forefront of an important innovation in education delivery— competency-based education. Such an approach emphasizes the importance of attaining specific skills and knowledge in a postsecondary educational setting, tailored to each student's unique pace for learning, rather than on units of time to measure coursework. We are encouraged by the PROSPER Act's inclusion of provisions that would allow for learners pursuing competency-based learning to be eligible for federal student aid. However, we are concerned that the definition of competency-based education is too vague to ensure that competency-based education is implemented properly and is of high quality. Advance CTE recommends further refining this definition to ensure portability and transferability of credits earned through competency-based education to other programs, including traditional programs.

Increase Opportunities for Experiential Learning: More than ever before, employers are valuing real-world work experiences as a core component of a student's qualifications for employment. Experiential learning opportunities provide students the opportunity to apply what they have learned in the classroom to the real world and foster the development of employability skills that enhance their ability to successfully transition into the modern workplace. We applaud efforts to make the Federal Work Study program align with students' career interests by removing the cap on private sector employment. We also encourage the Committee to find additional opportunities in this legislation to

increase access to work-based learning. While one such opportunity is through apprenticeship, the provisions included in Title II do not go far enough to ensure that the necessary quality controls are in place to ensure that these apprenticeships serve all learners. In addition, the apprenticeship provisions lack needed connections to efforts through the Department of Labor.

Develop and Nurture the CTE Teacher Workforce:

Prepare and Support Quality CTE Educators: Across the country, State Career Technical Education (CTE) Directors consistently report a persistent shortage of CTE instructors and faculty. To address this shortage and to develop the CTE instructor/faculty workforce needed to meet the growing demand for CTE programs, teacher preparation activities authorized in current law should afford prospective teachers the opportunity to gain relevant technical training in the industry area where they intend to teach. Moreover, greater flexibility should be given to teacher preparation programs to recruit and support mid-career professionals seeking to transition into the classroom. To effectively support these efforts, Advance CTE recommends that the PROSPER Act include funding and support services for CTE teacher preparation and related professional development. Furthermore, efforts to include apprenticeship within the PROSPER Act should not come at the expense of eliminating Title II and the role it could play in addressing the shortage of CTE instructors and faculty.

In conclusion, Advance CTE appreciates that the PROSPER Act recognizes the importance of a strengthened connection between postsecondary education and the workforce; however we are concerned that the proposal lacks the necessary protections and provisions to ensure that all learners, especially those who are most vulnerable and underserved by postsecondary education, will be able to access and benefit from a quality postsecondary education. Further, we are concerned that many of the untested policy proposals may have a deleterious impact on access and quality, namely the proposed funding model for financial aid, the narrowed accreditation focus and the elimination of teacher preparation and professional development efforts under Title II. With the scope and potential impact of the proposed changes, we also strongly encourage the Committee to include a more developed transition plan to ensure that postsecondary institutions and learners are not harmed. Advance CTE looks forward to working with the Committee to develop a bipartisan HEA reauthorization proposal that supports the CTE system and ensures equitable access and opportunities for all learners to pursue the career of their choice. If you have any questions about our comments, please feel free to contact Advance CTE's Senior Associate for Federal Policy, Kathryn Zekus (kzekus@careertech.org).

Sincerely,

Kimberly A. Green

Kimberly A. Green
Executive Director