



February 2, 2015

The Honorable Lamar Alexander  
U.S. Senate Committee on Health,  
Education, Labor, and Pensions  
Washington, DC 20510

The Honorable Patty Murray  
U.S. Senate Committee on Health,  
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Dear Chairman Alexander and Ranking Member Murray:

On behalf of the National Association of State Directors of Career Technical Education Consortium (NASDCTEc) I write to submit the following comments on the *Every Child Ready for College or Career Act of 2015* discussion draft legislation. NASDCTEc represents the state and territorial leaders for Career Technical Education (CTE) throughout the country and many of its members have additional responsibilities including, but not limited to state administration and oversight of secondary education programs.

We are committed to working with members of the Senate Health, Education Labor and Pensions (HELP) Committee on a bipartisan basis to reauthorize this critically important law and to ensure that the every student in the nation has access to a high-quality education that empowers them to pursue the postsecondary and career pathways of their choosing. Nearly 95 percent of U.S. students take at least one CTE course while enrolled in high school, while 38% of the high school population takes a concentration of CTE courses.

NASDCTEc believes any federal legislative effort focused on improving secondary student performance must engage CTE in a meaningful manner. Given CTE's success at increasing graduation rates well above state and national averages, improving transition rates to postsecondary education and increasing student engagement, there must be stronger connections built between the Elementary and Secondary Education Act (ESEA) and the CTE programs of study authorized and funded through the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins).

ESEA bears the important responsibility of ensuring that every student, regardless of their zip code, ethnicity, or socioeconomic status, leaves high school ready for both college *and* career. To achieve this goal, we believe that ESEA must have a more intentional and clear focus when investing in secondary schools. In addition to a clearer role and investment in high schools, stronger efforts should be made to seamlessly align and compliment programs supported through the Perkins Act.

The current discussion draft seeks to do this in several ways, including requiring the alignment of state standards with state performance measures outlined in section 113(b) of the Perkins Act. However, the committee could strengthen these provisions by also requiring alignment to existing state standards that explicitly incorporate the knowledge and skills necessary for employment in

current and emerging careers. This would not require states to adopt a defined set of standards. Rather it would afford states the flexibility to align with state-identified CTE standards, such as those expressed in the Common Career Technical Core (developed by 42 states, the District of Columbia and Palau).<sup>1</sup> We strongly support federal policy that encourages state adoption of rigorous college and career ready standards that will adequately prepare students with the knowledge and skills necessary to be truly career ready.

We also know that what is measured is what is most often prioritized. We are encouraged by the continuation of annual state and local report card systems. However, if this legislation is to truly prepare students for both college and careers, measures of career readiness should be incorporated into state accountability systems. These additional measures should be aligned to other federal requirements, such as Perkins' technical skill attainment performance measure and/or student attainment of recognized postsecondary credentials— as defined under the recently passed Workforce Innovation and Opportunity Act.

The current discussion draft makes great efforts to provide states with the necessary flexibility and freedom to support innovative educational models. To build on this, NASDCTEc urges the committee to consider additional language encouraging state and local adoption of competency based educational approaches. Just as we believe that career readiness should be measured in multiple ways, so too should there be flexibility in how and when students learn and how we measure academic progress and competency. If a competency based approach is chosen by a state, federal legislation should require appropriate assurances from state and local communities with regards to teaching and assessment. We believe that demonstrations of competency, such as capstone projects, portfolios, and work-based learning opportunities should be readily available and viable options for states that choose to pursue such types of assessment.

NASDCTEc applauds the proposed elimination of No Child Left Behind's harmful "highly qualified teacher" (HQT). The removal of this provision will support mid-career professionals' transition into the teaching profession and promote the integration of academic and technical coursework by expanding opportunities for joint planning and instruction. To build upon this work and address the unique challenges facing the CTE teaching profession, we recommend that the draft also incorporate stronger language encouraging states to adopt rigorous but alternative pathways for CTE teachers to obtain the necessary teaching credentials required by state law.

NASDCTEc also strongly believes that a new ESEA should provide support for comprehensive career and academic counseling beginning no later than middle school. However, the current draft proposes the elimination of the Elementary and Secondary Counseling Act which is one of the only remaining federal sources of support for such activities. In order for students to be truly college and career ready, students and parents must be kept informed of important career and academic options and expectations such as course requirements, coursework options, postsecondary entrance requirements, and employment options. We therefore urge the committee to reconsider the elimination of this program and to consider ways career and academic counseling can be a more integral component of the effort to reauthorize this legislation.

With regards to the funding provisions contained in this draft proposal, NASDCTEc is concerned regarding the proposed elimination of the "maintenance of effort" (Sec. 9108) requirements

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<sup>1</sup> <http://www.careertech.org/CCTC>

contained in current law. In the past, these provisions have helped to stimulate and ensure state and local investment in education, particularly during periods of economic hardship. Additionally, changes to maintenance-of-effort (MOE) provisions in ESEA will have wider ramifications for other pieces of legislation, including the Perkins Act. There is no question that MOE provisions impact states differently, creating incentives and barriers to additional state investment. However, to eliminate these provisions without fully understanding the ramifications of such a dramatic policy change could prove to have unintended consequences. We therefore urge the committee to take a more cautious approach to MOE and to explore a more moderate solution than the full elimination of this provision.

Finally, we applaud the committee's efforts to give state and local communities additional flexibility in determining compliance with the draft proposal's "supplement not supplant" (Sec. 1006) provisions. We believe the proposed changes would have a positive effect on state and local capacity to administer and implement programs funded under this law and other pieces of federal education legislation.

NASDCTEc looks forward to engaging with the committee as it continues its consideration of this important legislation. The priorities and ideas we share in this letter were difficult to reflect via direct edits to the text of the current draft proposal without fully rewriting large sections of the proposal. However, should the committee have interest in exploring any of the proposed ideas above, we are happy to assist in drafting language or expanding the policy concepts proposed above.

We remain hopeful that this will remain a bipartisan endeavor that will truly prepare our students to be college and career ready. Please contact our Government Relations Manager, Steve Voytek ([Svoytek@careertech.org](mailto:Svoytek@careertech.org)) should you have any remaining questions or concerns regarding the above comments.

Sincerely,

*Kimberly A. Green*

Kimberly Green  
Executive Director  
NASDCTEc