**Career Pathways RFI - Docket ID: ED–2014–OVAE–0044**

June 6, 2014

Thank you for the opportunity to submit these comments in response to the April 23, 2014 request for information published in the Federal Register. These comments are being submitted on behalf of the National Association of State Directors of Career Technical Education Consortium, a not-for-profit association representing the state leaders of secondary, postsecondary and adult Career Technical Education (CTE).

**1. Using the list of key components of career pathways discussed in the Background section of this RFI as a general guideline, please describe any Federal, State, or local policies, frameworks, or initiatives of which you are aware that have been used to support the development of career pathways systems.**

The National Association of State Directors of Career Technical Education Consortium (NASDCTEc), in partnership with the states, secondary and postsecondary educators and industry partners, developed the National Career Clusters Framework. This Framework organizes the entire array of the economy through 16 Career Clusters and 79 Career Pathways and endeavors to support preparation of students of all ages for the complex and ever-changing economy.

The 16 Career Clusters (<http://www.careertech.org/career-clusters>) are:

1. *Agriculture, Food & Natural Resources*
2. *Architecture & Construction*
3. *Arts, A/V Technology & Communications*
4. *Business Management & Administration*
5. *Education & Training*
6. *Finance*
7. *Government & Public Administration*
8. *Health Science*
9. *Hospitality & Tourism*
10. *Human Services*
11. *Information Technology*
12. *Law, Public Safety, Corrections & Security*
13. *Manufacturing*
14. *Marketing*
15. *Science, Technology, Engineering & Mathematics*
16. *Transportation, Distribution & Logistics*

Over the last decade, this Framework has served as an organizing and transformative tool for how Career Technical Education (CTE) describes and organizes its programs, curriculum design and instruction. In a recent analysis of states, we found that nearly every state uses this Framework to describe and organize its CTE system at the secondary and/or postsecondary levels.

The Framework was a means of transforming vocational education into CTE by presenting a new way of preparing students for the modern workplace by providing them with more adaptable and flexible skills that apply to an entire industry sector (Career Cluster-based knowledge and skills), as well as common skills and knowledge related to the major groupings of occupations within a sector (Career Pathway-based knowledge and skills). This was a major shift as traditional vocational education programs historically prepared students for a single job, not with the spectrum of academic and technical skills and knowledge that ranged from broad Career Cluster to occupation-specific. The National Career Clusters Framework also include standards (or knowledge and skills statements) that align to the Career Cluster and Career Pathway ‘levels,’ which then lead to and support existing industry-developed, occupation-specific standards. The Career Cluster knowledge and skills statements were first released in 2001 and last revised in 2012.

While the Career Clusters provide an organizing framework for a program’s expectations, the Rigorous Program of Study Framework has begun to advance what a program should entail comprehensively. The minimum requirement set by the Carl D. Perkins Career and Technical Education Act (Perkins) that each local recipient of Perkins funds must offer at least one program of study has helped change the CTE landscape. Programs of study, unlike more traditional CTE programs, must:

* Incorporate and align secondary and postsecondary education elements.
* Include academic and CTE content in a coordinated, non-duplicative progression of courses.
* Offer the opportunity, where appropriate, for secondary students to acquire postsecondary credits.
* Lead to an industry-recognized credential or certificate at the postsecondary level, or an associate or baccalaureate degree.

In many ways, programs of study are career pathways as they encourage alignment across systems, on- and off-ramps for learners at different levels, and the attainment of credentials and/or degrees. To support the systemic development and implementation of effective programs of study, the U.S. Department of Education’s Office of Career, Technical and Adult Education in collaboration with NASDCTEc and other major national organizations, developed the Rigorous Program of Study Framework (see more in Question 2 on current challenges with program of study implementation).

The Framework components are:

* Legislation and Policies
* Partnerships
* Professional Development
* Accountability and Evaluation Systems
* College and Career Readiness Standards
* Course Sequences
* Credit Transfer Agreements
* Guidance Counseling and Academic Advisement
* Teaching and Learning Strategies
* Technical Skills Assessments

These two frameworks converge in the Common Career Technical Core (CCTC). Built in 2012, the CCTC are the result of 42 states, Washington DC and Palau[[1]](#footnote-1) coming together to develop a set of common benchmarks for what CTE students should know and must be able to do at the end of a program of study. The CCTC were informed by input from more than 3,500 representatives from K-12, postsecondary and business/industry, and built upon a decade of nationally validated Career Clusters Knowledge and Skills Statements.

The CCTC includes a set of standards for each of the 16 Career Clusters and their corresponding 79 Career Pathways that define what students should know and be able to do after completing instruction in a program of study. The CCTC also includes an overarching set of Career Ready Practices that apply to all programs of study. The Career Ready Practices are 12 statements that address the knowledge, skills and dispositions that are important to becoming career ready. These practices provide a framework for developmental experiences that can be “practiced” using many different approaches and in a variety of settings (e.g., academic and technical classrooms, after-school programs, career technical student organizations, work-based learning experiences, etc.).

**The Career Ready Practices (http://careertech.org/career-ready-practices) are:**

* Act as a responsible and contributing citizen and employee.
* Apply appropriate academic and technical skills.
* Attend to personal health and financial well-being.
* Communicate clearly and effectively and with reason.
* Consider the environmental, social and economic impacts of decisions.
* Demonstrate creativity and innovation.
* Employ valid and reliable research strategies.
* Utilize critical thinking to make sense of problems and persevere in solving them.
* Model integrity, ethical leadership and effective management.
* Plan education and career paths aligned to personal goals.
* Use technology to enhance productivity.
* Work productively in teams while using cultural global competence.

The Career Clusters were also foundational to efforts in supporting the development of CTE programs of study. With support from the federal government, NASDCTEc and its state, local and industry partners developed a set of sample plans of study. These have been instrumental in helping states and local educators, in partnership with their communities and stakeholders, to conceptualize and visualize the transformation of CTE programs of study from a sequence of a handful of elective courses to a method of delivery of instruction that encompasses secondary and postsecondary education, as well as academic, technical, employability and work-based learning experiences.

All of these resources – the Common Career Technical Core, the National Career Clusters Framework, the sample plans of study – are resources available to support this important work laid out in this RFI and can be found at www.careertech.org. Additionally, NASDCTEc in partnership with CORD published a book The Career Pathways Effect: Linking Education and Economic Prosperity, which is a compendium of resources, best practices and research, organized by the Rigorous Programs of Study Framework, to support state and local leaders as they endeavor to advocate for, develop and implement programs of study and career pathways.

TAGS: Career and Technical Education (CTE), Career Clusters, Career Pathways, Common Career Technical Core, Rigorous Program of Study Framework, Academic and Technical Integration, programs of study, collaboration

**2. What factors, in your opinion, have facilitated the implementation of career pathways systems at the State or local level (e.g., the use of key resources or technical assistance tools)? What factors have made career pathways systems difficult to implement and/or replicate on a large scale?**

The Rigorous Programs of Study Framework, developed by the U.S. Department of Education’s Office of Career, Technical and Adult Education in partnership with various stakeholders groups and associations was instrumental in advancing high-quality CTE programs of study. It provided options and clarity about expectations that were missing from federal legislation. Unfortunately, the expected or recommended use of the Framework was not made clear to the states and local providers. As such, the Framework has not realized its full potential. Further, the Framework and the very concept of programs of study compared to or in relation to career pathways is oft misunderstood.

The joint letter by the three federal agencies laid out a desire for systems and agencies to collaborate but did little beyond laying out a philosophical goal. However, for the CTE community the letter was somewhat confusing as it was not at all clear how the U.S. Department of Education’s support for career pathways impacted the existing work on programs of study. Was it to replace the existing programs to study work? Would it complement or supplement the existing work? This confusion has yet to be alleviated.

It would be helpful for the agencies to be specific and clear in how the CTE community should reconcile the expectations of the joint letter, Perkins and the Rigorous Programs of Study Framework. It would especially be helpful for the agencies to clarify and explain that programs of study begin with a goal of career exploration moving toward career preparation, whereas most career pathways systems have a singular goal of career preparation. Or put another way, programs of study are an education initiative that leads to and supports further education and job training while the career pathways programs are more specifically job training. In practice, this often leads to secondary and postsecondary systems collaborating around programs of study and postsecondary and workforce development systems collaborating around career pathways rather than all three systems working together to build a comprehensive and seamless career development system.

CTE sits at the nexus of both education and training, benefiting learners who will be future workers as well as supporting those immediately entering or current part of the workforce. Being in this position, CTE is uniquely positioned to be a bridge between these the K-12, postsecondary and workforce development systems but it must be recognized and valued in all systems.

Finally, we hope out of this RFI the agencies will clearly identify opportunities, remove administrative and regulatory barriers (including, but not limited to, reporting requirements and funding restrictions), and promote replicable practices for systems collaboration.

TAGS: Career and Technical Education (CTE), Rigorous Programs of Study Framework, Academic and Technical Integration, programs of study, collaboration, linkages, secondary and postsecondary education

**6. How do you ensure that your career pathways system is staying current with labor market trends, particularly current demand, to respond to the need for particular skills and credentials in emerging industry sectors?**

It is important the states, districts and/or individual institutions monitor the labor market trends through the use of accessible and credible labor market data, as well as engaging with and listening to postsecondary and employer stakeholders. We believe that it is important for all of education to be responsive to the needs of the labor market and the identification, prioritization and investment in education programs should be informed by data. However, it is especially critical to provide the flexibility to respond not only to the short-term labor market needs but to also invest and support a well-prepared pipeline of workers who have adaptable skills and competencies who can nimbly respond to the yet-to-be-known needs of the future economy.

The work being done by CTE at the secondary and postsecondary level through programs of study has the responsibilities of career exploration (helping students figure out what they would like to do and what they are good at) through specialized career preparation. Recognition of this multi-faceted set of responsibilities is important to consider when aligning systems, program requirements and imposing accountability metrics.

It would be helpful to assist in communications resources that share how states and local providers should understand the connections between competency models published by the Department of Labor with the education-based Career Clusters.

Finally, we believe there is a tremendous need for more, well-informed career guidance and advisement. The loss of funding for section 118 in Perkins eliminated the investment states had to translate labor market information into useful resources for parents and students. A dedicated effort that helps these stakeholders navigate and understand the labor market data and the educational pathways (including costs) to obtain positions in the workforce is needed.

TAGS: Career and Technical Education (CTE), career guidance and advisement, labor market information, programs of study, collaboration, competency frameworks, data

**9. What are the challenges and / or facilitators to building and / or offering stackable and portable, industry-recognized credentials? How can these industry-recognized credentials be incorporated into and / or aligned in a successful career pathways system**?

Over 50 million U.S. adults— one in four— have obtained a professional certification, license or educational certificate outside the purview of a postsecondary two- or four-year degree program.[[2]](#footnote-2) The increasing prevalence of these postsecondary credentials cannot be understated. However, a framework for clearly defining their value to the labor market is a fundamental component that is sometimes missing. Industry recognition helps to alleviate this problem, at least to a certain extent, by lending additional credibility to a specific credential, increasing its portability, and imbuing a greater sense of transparency regarding employer expectations for a prospective employee’s aptitudes and competencies.

Industry-recognized credentials should therefore be natural features in any career pathways system, as they clearly have positive effects on the employment prospects for individuals following program completion or exit. In fact, in some instances, an individual may not be able to access a career opportunity without a certain certification and/or license.

As the attainment of these credentials are promoted within a career pathways system, it is important that the pathways offer not only minimum level credentials, but also more advanced ones. Often referred to as “stackable credentials,” more advanced or specialized credentials allow individuals to not only enter the workforce but continue to advance within their careers by demonstrating the mastery of new or more advanced skills. Successful career pathways systems should encourage this type of progression, which also allows for multiple entry and exit points and encourages lifelong learning and training, so critical in today’s ever-changing economy.

Industry-recognized credentials can best be incorporated into a successful career pathways system through CTE programs of study. At its core, a CTE program of study connects secondary and postsecondary education through a non-duplicative sequence of courses which leads to an industry recognized credential, among other desirable postsecondary outcomes such as an associate or baccalaureate degree. This framework for delivering CTE can be integrated well within any career pathways system and should be one of the main vehicles for promoting industry-recognized credentials within such as system. CTE programs of study must implement high-quality curriculum to adequately prepare students to successfully obtain an industry recognized credential. Moreover, instructors and training providers within a CTE POS receive professional development opportunities which enable them to provide significantly more relevant and rigorous instruction based on a familiarity with the demands of the contemporary workplace.

There are, however, a number of challenges that arise when attempting to prioritize industry credential attainment, especially within a CTE program of study framework. The costs of assessments needed to obtain an industry-recognized credential can be much higher than other postsecondary credentials.[[3]](#footnote-3) These costs are shouldered either by the program or the student and can sometimes be shared between the two. Additionally, the costs of maintaining a program that leads to such an industry-recognized credential are also considerably higher than a program that does not result in such a credential. Specialized equipment and other such features are often barriers to institutions, which would otherwise like to offer programs leading to an industry certification. Strategies and approaches that provide adequate resources and funding for these purposes are therefore preferred whenever integrating a CTE program of study into a career pathways system.

Another challenge is that not all pathways and industry sectors have an associated industry-recognized credential, preventing this from being a common measure across the board. For example, the Agriculture, Food and Natural Resources Career Cluster includes very few commonly used industry-recognized credentials, while other Career Cluster areas—such as Health Science or Information Technology—offer a wide array from a range of transferable and stackable industry certifications.

Finally and perhaps the most fundamental challenge is that not all industry-recognized credentials are of equal value to students and employers. Some credentials require short-term training, while others require extensive practical and classroom-based instruction. Some credentials are explicitly listed in job postings, while many others are not. There have been few, if any, true longitudinal studies to identify the return on investment among the hundreds of credentials available, making it difficult for individuals to make fully informed decisions. In many cases, programs will rely on employers to suggest specific credentials, but those credentials may be aligned with specific companies’ needs rather than the greatest long-term value to individuals.

TAGS: Career and Technical Education (CTE), industry-recognized credentials, labor market information, programs of study, data

**10. How are participants’ outcomes measured, and to what extent are the data used to monitor and improve the strength of your career pathways system? Please indicate if there are other data points or ongoing evaluation efforts used to improve the strength of your career pathways system**.

It is difficult for some education and workforce development programs, found both within and outside a career pathways system, to get reliable and consistent data on participant outcomes. This is particularly apparent for programs that depend on post-program surveys of graduates to determine a participant’s post-program outcomes such the attainment of a postsecondary credential, successful entry (and retention) in the workforce, or other such desirable outcomes. These types of surveys are administratively burdensome on programs and lack the accuracy of a more comprehensive data system. Student privacy prohibitions, contained in current federal statute, compound this problem by making it difficult, and in some instances impossible, to match student records to employment or credential data.

For instance, credentialing entities are not required to share with schools individual-level data on credential attainment. Measuring a program’s performance based on these types of outcomes is therefore problematic since the necessary data systems are non-existent. Strengthening data linkages between programs and employment data are therefore necessary.

TAGS: Career and Technical Education (CTE), industry-recognized credentials, labor market information, data

**11. How do performance measures associated with specific Federal funding statutes / streams (i.e., WIA, Perkins, TANF, etc.) facilitate or impede the tracking of participant outcomes**?

Common performance metrics are needed throughout all major pieces of federal education and workforce legislation. Unfortunately this type of commonality is often missing not just between separate pieces of federal legislation, but also within individual existing funding statutes. For instance, current performance measures contained in the Workforce Investment Act (WIA) vary widely from program to program authorized under the Act. These inconsistencies between program performance measures present challenges to workforce development and education programs attempting to provide training and services under the legislation. Having to report on many different measures of performance is overly burdensome to states, service providers and also prevents comparisons of outcomes across various programs.

Conversely, the purposes and objectives of these pieces of legislation must also be taken into consideration. Common performance metrics can only be integrated across funding streams if the objectives of each program or service are harmonized. A particularly instructive example materializes when attempting to integrate performance measures for the Carl D. Perkins Career and Technical Education Act (Perkins) and WIA. For Perkins, core indicators of performance at the secondary level are designed to gauge student academic and technical achievement, graduation rates and student outcomes following graduation. More broadly, these indicators are intended to capture student outcomes for the goal of further postsecondary education, not direct employment.

On the other hand, Perkins performance measures for the postsecondary level are crafted in a way that encourages direct employment after completing a course or series of courses. WIA performance measures, which again vary dramatically across programs, are predominately aimed at direct employment and thus have a natural affiliation with some of the Perkins postsecondary performance indicators. As policymakers seek to align the performance measures contained in both Perkins and WIA, they must remain cognizant of these dual purposes for secondary and postsecondary CTE. Finding common ground between performance measures in both Perkins and WIA— as with other federal funding statutes— should be prioritized in any career pathways system.

TAGS: Career and Technical Education (CTE), data, performance funding

Thank you for the opportunity to submit these comments. We have many resources available to support states and local communities as they endeavor to better align their education, workforce training and economic development systems and seek to ensure that the resources of CTE are part of these discussions.

Sincerely,



Kimberly A. Green

Executive Director

1. The states involved include: Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New Jersey, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Palau, Pennsylvania, Rhode Island, South Dakota, Tennessee, Utah, Vermont Washington, West Virginia, Wisconsin, Wyoming [↑](#footnote-ref-1)
2. http://www.census.gov/prod/2014pubs/p70-138.pdf [↑](#footnote-ref-2)
3. http://scholar.lib.vt.edu/ejournals/JCTE/v21n2/pdf/castellano.pdf [↑](#footnote-ref-3)