



December 12, 2023

The Honorable Virginia Foxx
Chair
Committee on Education and the Workforce
United States House of Representatives
Washington D.C. 20515

The Honorable Robert "Bobby" Scott
Ranking Member
Committee on Education and the Workforce
United States House of Representatives
Washington D.C. 20510

The Honorable Elise Stefanik
Committee on Education and the Workforce
United States House of Representatives
Washington, D.C. 20515

The Honorable Mark DeSaulnier
Committee on Education and the Workforce
United States House of Representatives
Washington, D.C. 20515

Dear Chair Foxx, Ranking Member Scott, Representative Stefanik, and Representative DeSaulnier,

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 and technical education (CTE) across all 50 states and U.S. territories, we write in response to the recent introduction and markup of H.R. 6585, the Bipartisan Workforce Pell Act (BWPA). As you are aware, our organizations for nearly a decade have advocated for much-needed reforms to the federal Pell grant program to make our existing system of postsecondary education finance more equitable and responsive to the needs of learners and the wider labor market.

We appreciate your bipartisan efforts to prioritize this critical issue which would help ensure that high-quality postsecondary CTE programs can be supported with federal Pell grants. We strongly believe that any proposal to expand federal Pell grant funding for shorter-term CTE programs should promote rigorous program quality while protecting learners and consumers from predatory and low-quality programs that do not lead to further opportunity.

We were therefore pleased to note that many elements of the BWPA are aligned with this vision for expanded eligibility for Pell grants for high-quality, shorter-term CTE programs. For example, the proposal recognizes the importance of credential quality and emphasizes the need for national portability and alignment to employer needs, while at the same time allowing for flexibility in program delivery through distance learning. Similarly, the BWPA promotes the stackability of credentials to ensure eligible programs lead to further opportunity and, where appropriate, can articulate for further postsecondary credit.

Our organizations were also encouraged to note that the BWPA would leverage state workforce development and CTE systems to determine programmatic alignment to high-skill, high-wage, or in-demand sectors of the economy. This is an important recognition that CTE programs provide critical pathways to all sectors of our shared economy, including those in new and emerging industries where these elements are sometimes difficult to quantify. These aspects of the legislation are critical to aligning systems of postsecondary education to the needs of learners and workers who are navigating a rapidly changing economy. The proposal also contains important data provisions that would enable stakeholder access to the data and information, especially wage records, needed to reliably report on the many other outcomes requirements contained in the BWPA in transparent and accessible ways that can further inform consumers, employers, and policymakers.

Equally as important, we firmly believe new legislation on this critical issue should result in a meaningful expansion of Pell eligibility that allows high-quality CTE programs with demonstrated track records of success to actually qualify for funding. Quality assurance requirements should be constructed to ensure a reasonable balance with administrative burden, to the extent possible, on the postsecondary education institutions that will ultimately be tasked with administering and implementing this legislation, and in ways that validly and reliably measure the impact of the program. For example, our members have expressed concerns about the high school earnings threshold measure included in the most recent iteration of gainful employment regulations. A similar measure is contained in this proposal, and we are uncertain whether and how these overlapping requirements will be operationalized during implementation. As noted in our comments submitted in response to that regulatory undertaking, there are a myriad of practical and equity-related concerns related to such a measure, and our organizations believe that a measure assessing increases in individuals' earnings following successful program completion is more appropriate in measuring programmatic impact.

Despite these concerns, we recognize that this bipartisan proposal is a significant step toward ensuring more learners have access to high-quality short-term CTE programs that lead to opportunities in many of the fastest growing and dynamic sectors of our shared economy. We look forward to continuing to work with Congress to refine and build upon the BWPA as the legislation continues to work through the wider legislative process and would welcome the opportunity to further discuss these ideas and the vision for the federal Pell Grant program with you at your convenience. Should you desire to do so, please do not hesitate to contact Steve Voytek, Advance CTE's Federal Policy Advisor (svoytek@careertech.org) or Jimmy Koch, ACTE's Manager of Government Relations (jkoch@acteonline.org).

Thank you,



LeAnn Curry
Executive Director
ACTE



Kate Kreamer
Executive Director
Advance CTE