



December 19, 2023

The Honorable Virginia Foxx
Chair
House Committee on Education & Labor
Rayburn House Office Building
Washington, D.C. 20515

The Honorable Robert Scott
Ranking Member
House Committee on Education & Labor
Rayburn House Office Building
Washington, D.C. 20515

Dear Chair Foxx and Ranking Member Scott,

On behalf of Advance CTE, the nation's longest-standing not-for-profit representing State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education (CTE) across all 50 states and U.S. territories and 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, we are writing in response to the recent House Education and Workforce Committee markup and passage of H.R. 6655, A Stronger Workforce for America Act (ASWA)—legislation that would reauthorize the Workforce Innovation and Opportunity Act (WIOA). We commend the committee for moving forward with this important effort in a bipartisan fashion.

Reauthorization of WIOA represents a critical opportunity for Congress to thoughtfully reassess the nation's publicly funded workforce system and propose new ways to better serve learners, workers, and employers. Our organizations believe that it is imperative that future WIOA legislation effectively ensures that all individuals seeking help from the primary federal investment in workforce development can access the education, skills development, and supportive services that they need for success.

We are therefore encouraged to note the following elements and provisions in H.R. 6655, that begin to align with this vision for the future, including:

- The creation of a revised "opportunity youth" definition that replaces WIOA's existing "out-of-school youth" definition and makes positive changes to the requirement regarding school enrollment status. Greater flexibility in the definition of opportunity youth will allow for better coordination and alignment with CTE activities and programs funded by Perkins V. These changes would also allow stakeholders to more effectively provide services to vulnerable youth populations before they become disconnected from education.
- Modifications to the "split" of WIOA youth funding, which would allow greater flexibility for states and local workforce areas to prioritize these populations based on the actual needs of their communities.
- Formalized coordination of career pathways programs implemented in local workforce areas and the CTE programs of study. This new requirement has the potential to improve alignment between education and training initiatives at the state and local level and helpfully mirrors a similar requirement contained in Perkins V.

- Expanding statewide youth activities to include raising public awareness about CTE programs and related opportunities in the state—based on legislation that both of our organizations have previously endorsed this Congress.
- The codification of the Strengthening Community Colleges Training Grant (SCCTG) program, which would provide much-needed resources to these institutions to improve CTE program offerings. Importantly, this program includes requirements that grant applications align to the workforce strategy elements contained in Perkins V state plans.
- Required coordination and alignment between the newly codified Reentry Employment Opportunities program and Perkins V’s institutional set-aside which will increase opportunities for the populations of learners served by both of these efforts.
- The broadening of “foundational skill needs” to include, for the first time, skills needed in the modern workplace including digital literacy, to more appropriately reflect the importance of these competencies in an increasingly digital-first world.
- The codification of the Workforce Data Quality Initiative Grant program, including an increased proposed authorization level for this initiative. These proposals would enable stakeholders to link existing P-20W data systems and make better use of information produced and collected within the workforce system. Additionally, we were encouraged to note efforts to allow for greater access to sources of wage record data that would greatly enhance the accuracy and timeliness of data and information generated within WIOA.
- Improvements to data transparency provisions contained throughout the draft, which we believe would greatly enhance the usability and quality of the data generated by and used both within and beyond WIOA. Similarly, ASWA’s strengthened focus on the use of quality labor market information—critical information that is also used to align CTE programs with the needs of the labor market—would ensure programs and services funded by the legislation lead to further opportunity in the economy.

In addition, there were other encouraging aspects of the legislation not noted above. This included significant changes to the identification of eligible training providers using more streamlined eligibility criteria and related use of lists to facilitate oversight and reporting. Our organizations were also pleased to note more intentional and thoughtful inclusion of Area Technical Centers throughout the proposal, including allowing for these institutions to serve as a one-stop operator in local workforce areas.

Our organizations also recommend improvements to some of these positive aspects of the draft legislation to further strengthen the proposal. For instance, we recommend that more flexibility be offered regarding how states split youth funding and that there be greater required CTE consultation to determine how and in what ways these funds are subsequently used between eligible populations. We also believe that the codification of the SCCTG program could be further improved by aligning to more aspects of state Perkins V plans and should also include coordination with local plans, as well as the comprehensive local needs assessment, conducted under Perkins V.

Despite these encouraging aspects of H.R. 6655, our organizations were disappointed to note that ASWA lacks required alignment and coordination to Perkins V and other federally funded CTE activities which have been previously proposed in the context of WIOA reauthorization. For instance, Perkins eligible agencies and recipients are not outlined as an entity that should be consulted when seeking to align CTE, postsecondary education, and secondary education systems to state and local WIOA plans. Our organizations also remain concerned about the lack of required or optional CTE stakeholder representation on state and local workforce development boards (WDBs). Given the significant degree of alignment to the workforce system that is now required in Perkins V, particularly that WIOA stakeholders and various components of WIOA planning are required as part of state and local CTE systems and related

processes, we strongly recommend that future WIOA legislation ensure these efforts are reciprocated. This necessarily begins by ensuring CTE has a seat at the table. We therefore strongly urge future WIOA legislation to explicitly require CTE representation within state and local workforce boards. This would help to ensure that state and local WIOA plans and related initiatives are aligned to and coordinating with activities already underway within secondary, postsecondary, and adult CTE systems.

We are also concerned regarding the potential equity implications of ASWA's new 50 percent training mandate. As you know, WIOA is an important—and sometimes the only—source available for supportive services such as transportation, childcare, and other assistance many WIOA participants may require to be successful in education and training. As structured, this mandate does not take into account the important role these services have in ensuring individuals with significant barriers to employment will find success in education and training initiatives. This provision also has the potential to impact CTE programs that are seeking to coordinate and align with workforce development initiatives authorized by WIOA to serve these populations. We therefore recommend substantial revisions to this component of the proposal to better account for and encourage the provision of supportive services for more WIOA participants.

The funding of one-stop infrastructure costs is also an area that our organizations remain focused on given the impact that existing WIOA law has on the postsecondary CTE programs receiving funds from Perkins V. ASWA proposes changes to this area of current law that would make modest improvements to a process that remains far too complex by defaulting these funding agreements to the Governor. However, this change would diminish local control in areas that have found workable solutions under the current infrastructure funding agreement process. In conjunction with the training mandate noted above, we worry that even fewer resources from WIOA Title I programs will be available to defray the costs of one-stop infrastructure. This has the potential to increase funding pressure on mandated one-stop partner programs, like Perkins V-funded postsecondary CTE programs, via ASWA's envisioned state funding mechanism. Given that one-stop centers and the broader one-stop system exists due to mandates in WIOA, we firmly believe that dedicated funding for this purpose is necessary. Providing dedicated funding will also have the benefit of freeing up additional resources within WIOA to provide training—a stated goal of the legislation.

Despite these concerns, Advance CTE and ACTE greatly appreciate your bipartisan efforts to develop and advance this important legislation. We remain committed to working with you and your colleagues on both sides of the aisle throughout the legislative process to build upon this proposal and refine it further to fully meet the needs of learners, workers, and employers. Should you have any questions or would like to discuss aspects of this letter further, please do not hesitate to contact ACTE's Manager of Government Relations, Jimmy Koch (jkoch@acteonline.org) or Advance CTE's Policy Advisor, Steve Voytek (svoytek@careertech.org).

Sincerely,



Kate Kreamer
Executive Director
Advance CTE



LeAnn Curry
Executive Director
ACTE