



June 28, 2012

The Honorable Arne Duncan
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Secretary Duncan:

On behalf of more than 3 million members, the National Education Association (NEA) raises for consideration the following issues regarding career and technical education (CTE) related to the Department's plan for transforming the CTE system. The federal government plays a critical role in ensuring that all students—especially the most disadvantaged—have access to an education that will prepare them to succeed in the 21st century. Our economy has changed, and to meet the new demands posed by industry and address the needs of an evolving student body, stakeholders must reexamine their roles, responsibilities, and programs.

Reauthorization of the Carl D. Perkins Career and Technical Education Act is aptly timed and parallels ongoing discussions in education about our students' postsecondary readiness. As you are aware, those occupations requiring an associate degree are projected to grow the fastest, about 19 percent, of all those requiring postsecondary education. Employers across the nation are stressing the need for more well-trained workers to fill vacancies. In fact, more than 80 percent of respondents in a National Association of Manufacturers' Skills Gap Report indicated that they are experiencing a shortage of qualified workers overall—13 percent report severe shortages and 68 percent report moderate shortages. The education and training supported by Perkins are vital to addressing this skills gap.

The Department of Education has proactively advocated for substantive policies with respect to CTE, which is a critical piece in bridging the country's skills gap. In addition, the Department has not suggested abdicating any federal responsibility in supporting or building access to CTE programs. NEA appreciated the opportunity to participate in the Department's outreach activities, adding its voice to those of other stakeholders concerned about strengthening CTE programs and ensuring students are prepared for a multitude of postsecondary options.

We were encouraged by the Department's focus on CTE by releasing "Investing in America's Future: A Blueprint for Transforming Career and Technical Education." NEA supports the Administration's effort to update the career and technical education system and is pleased that the Administration has embraced reform systemically, but has concerns with some of the key details of the approach. As the blueprint indicates, CTE programs need to prepare students for

a lifetime of career opportunities; and we believe it is the federal government that should provide the support to strengthen traditional CTE programs in addition to fostering innovation in strategies that will successfully blend college and career skills into stronger postsecondary readiness.

Aspects of the blueprint's recommendations do represent a step forward in creating a more national commitment to CTE programs. For example, fostering collaboration, particularly among business, labor, employment, and economic development sectors are essential for meaningful CTE programs of study. Concerning alignment, the identification and promotion of in-demand and high-growth careers holds promise for stronger programs of study. However, we would caution against narrowing criteria that could dim students' interests in public service careers or emerging industries. Establishing uniformity around participation and performance indicators is helpful for systemic reviews and enables stronger analysis for closing gaps. We also agree that common definitions of performance and disaggregated data will bolster the integrity of the system for all students. With respect to technology, access is critical from an instructional and practical perspective. Efforts to provide more students and schools with updated technology are a much needed resource.

While the blueprint's intent is admirable and clear, NEA is concerned about some key recommendations. We believe that left unchecked, some reforms may lead to unintended consequences: dramatic undermining of existing equity efforts; impediments to schools', districts', and postsecondary institutions' long-range planning; erosion of support for traditional industrial arts; or the termination of struggling programs. Listed below are major policy areas in which we would welcome ongoing dialogue with the Administration:

- **Shift to competitive funding**: Although the federal government still would provide states with funding through a formula, a proposed shift from formula to competitive within states negatively will impact schools, districts, and community colleges that currently rely on Perkins resources. The call for consortia-based funding also creates new fiscal, administrative, and political hurdles. Under a competitive funding plan, programs that need to improve—and need sustained resources to transform—will have no opportunity to do so. Further, by definition, competition denotes that some schools and, therefore, some students will not have access to quality CTE programs. Federal formula funds are critical to students' success, and they have never been more so than in today's economic climate.
- **Inclusion of educator voice**: Collaboration is a central theme of the blueprint, yet the participation of secondary and postsecondary educators (including teachers, education support professionals, and higher education faculty and staff) in decision-making activities is not explicit and should be. In building stronger programs, CTE educators and postsecondary CTE faculty and staff should be included in program and curriculum design.
- **Specificity about teacher quality**: The blueprint acknowledges that the possession of academic and/or technical skills does not equate with the ability to help diverse populations of students learn and thrive. NEA believes that teachers of record should be fully prepared, qualified, and certified, regardless of the subject matter. We look forward to working with the Administration to gain more clarity around its proposal for alternative licensure of CTE

teachers and to promote productive strategies for increasing the numbers of CTE faculty in postsecondary institutions.

- **Conditions for the reservation of funds for external organizations:** Given the loss of funding that schools and community colleges would experience under the Administration's approach, allotting funds for entities, including for-profits, to lead CTE activities does not align with the goal of equity and ensuring public dollars support public school systems and community colleges. No portion of reserved funding, as proposed, should be available to for-profits to manage CTE programs.

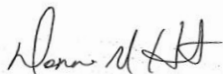
NEA supports an agenda for CTE that ensures access to the most up-to-date equipment; a strong pipeline of quality educators; participation of underserved and non-traditional students; and provisions for real career pathways. Achieving these goals also requires careful vigilance of Perkins funds, to improve certainty that resources allocated for CTE are used for its intended purposes. The CTE system has the potential and has demonstrated that it can bring together the academic skills, the technical skills, and strong partnerships with industry, employers, and educators to provide students with opportunities to try new things.

However, educating our students is not a one-size-fits-all proposition, and ensuring that they have an opportunity to explore a variety of educational offerings is essential. While industry has pressing needs for skilled workers, particularly those sectors cited such as healthcare, technology, and advanced manufacturing, we urge the Department to support actively more comprehensive curricula for students. Room exists for courses that include quality CTE programs as well as integrated, arts education programs, taught by certified arts specialists.

We welcome the opportunity to work with the Administration to ensure all students are prepared for postsecondary experiences, careers, citizenship, and lifelong learning in our global society. Research consistently has shown that when students are engaged in school, through coursework, relationships, and extra-curricular activities, they are less likely to drop out. We believe measures that provide schools, educators, and communities the dedicated, targeted resources needed to provide cutting edge CTE programs, instruction, and apprenticeships will ensure the greatest number of students achieve successful certification, gainful employment, and boundless options.

Please do not hesitate to contact me at dharris-aikens@nea.org should you have any questions.

Sincerely,



Donna M. Harris-Aikens
Director, Education Policy and Practice

cc: Dr. Brenda Dann-Messier, Assistant Secretary
Office of Vocational and Adult Education