



October 27, 2025

Submitted via Regulations.gov

Linda McMahon  
Secretary of Education  
U.S Department of Education  
400 Maryland Ave SW  
Washington, DC 20202

***RE: ED-2025-OS-0679; Proposed Priority and Definitions-Secretary's Supplemental Priority and Definitions on Career Pathways and Workforce Readiness***

Dear Secretary McMahon:

On behalf of the more than 3 million members of the National Education Association (NEA), we submit the following response to the Department of Education's proposed priority and definitions on career pathways and workforce readiness, as published in the Federal Register on September 25, 2025. In general, we are supportive of the Department's priority to strengthen workforce development, particularly in creating more inclusive career pathways for youth and adults. However, we would like to address the proposed definition of "out-of-school youth" and offer a recommendation for enhancing access to apprenticeship opportunities.

***Clarification on the Definition of "Out-of-School Youth" & Use of Age and Enrollment Bands***

The proposed definition of "out-of-school youth" (page 46112, column 3, items #3 and #4) raises important questions about eligibility for apprenticeship and workforce development programs. We request clarification on whether this term refers exclusively to individuals who are no longer enrolled in P-12 education, or whether it also includes those who are not currently enrolled in postsecondary education (P-16).

In addition, we ask that the Department specify how long a student must be unenrolled to be considered "out-of-school." Greater clarity will ensure that programs are targeted appropriately and effectively serve youth in transitional educational phases.

NEA recommends defining apprenticeship eligibility using either an age band of 16 to 24 or an enrollment band covering Grades 12 to 16, encompassing high school seniors through early postsecondary students. This framework would help support high school completion, ease the transition to postsecondary learning or employment, and reflect real-world readiness timelines.

This approach aligns with NEA’s commitment to equity in career and technical education. As stated in our *Career and Technical Education* policy, we support “real career pathways” that are inclusive of underserved and nontraditional students.<sup>1</sup>

### ***Supporting School-Based Educational Support Professionals (ESPs)***

We suggest the Department consider how apprenticeship pathways can be designed to include school-based employees, particularly Educational Support Professionals (ESPs). An ESP is defined as an educator working within a public school or public higher education institution that may include paraeducators that provide instructional and non-instructional support; secretarial, clerical and administrative support staff; custodians and maintenance service workers that provide building and grounds maintenance and repair; skilled trade workers that provide services in schools, such as electricians, carpenters, and workers who operate machinery; workers who provide food service, including preparation and serving of food; workers who provide school transportation and delivery services; computer, audiovisual, and language technical support staff; security staff; nursing, health, and therapy support staff, who may also provide community, family, parent and welfare services; and other staff that may serve public education students.

ESPs represent a critical yet often overlooked workforce already embedded in school communities, and they are ideal candidates for apprenticeship opportunities, both in education and the skilled trades. Supporting these individuals in accessing structured career pathways would help address workforce shortages while also promoting economic mobility and professional growth.

NEA has long supported career advancement for ESPs through peer mentorship programs and professional learning initiatives that emphasize workforce development for school staff.<sup>2</sup> Expanding apprenticeship access for ESPs would build on this foundation by offering real-time, work-based learning opportunities that enhance both retention and upward mobility.

We also encourage the integration of flexible apprenticeship models, such as 2+2 programs, which allow individuals to remain employed while earning associate or bachelor’s degrees. This approach mirrors the union-led apprenticeship models NEA supports in educator preparation, such as paid clinical residencies and “earn-while-you-learn” strategies, which have proven effective in reducing financial barriers and increasing workforce diversity.<sup>3</sup> These same principles can guide the development of inclusive apprenticeship pathways for ESPs and other school-based professionals.

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<sup>1</sup> <https://www.nea.org/career-and-technical-education>

<sup>2</sup> <https://www.nea.org/professional-excellence/professional-learning/esps/mentorship>

<sup>3</sup> <https://www.nea.org/nea-today/all-news-articles/union-led-apprenticeships-aim-ease-teacher-shortage>

## ***Conclusion***

We believe that the proposed priority on career pathways and workforce readiness offers potential to strengthen career pathways for youth, particularly those in underserved communities. By refining the eligibility criteria for apprenticeship programs and expanding opportunities for individuals working in education, we can create a more inclusive, sustainable, and effective workforce development strategy.

The NEA respectfully submits these recommendations for consideration. Please do not hesitate to contact me or Bianca Singh at [BSingh@nea.org](mailto:BSingh@nea.org), should you have any questions or need further clarification.

Sincerely,

A handwritten signature in black ink that reads "Daaiyah Bilal-Threats". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Daaiyah Bilal-Threats  
Senior Director, Education Policy and Implementation Center  
National Education Association