

October 27, 2025

The Honorable Linda McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Proposed Priority and Definitions-Secretary's Supplemental Priority and Definitions on Career Pathways and Workforce Readiness ([Docket ID ED-2025-OS-0679](#))

Secretary McMahon:

Thank you for the opportunity to provide comment on the U.S. Department of Education's (the Department) recently proposed discretionary grant priority and related definitions for Career Pathways and Workforce Readiness. We are pleased to see the Department's support for expanding career pathways and workforce readiness.

The undersigned organizations believe that every student and their family deserves clear and transparent information, strong preparation, and real choices to determine their postsecondary education and career pathway. When that happens, all students — regardless of race, income, or learning needs — can reach high standards, thrive, and confidently pursue the future they choose.

We value the Department's focus on promoting the attainment of in-demand and high-value industry-recognized postsecondary credentials; providing work-based learning opportunities for which a student receives wages, academic credit, or both; and expanding the availability of pre-apprenticeships and registered apprenticeships. We believe that these approaches, in addition to dual or concurrent enrollment, college and career exploration and advising opportunities, opportunities for students to use financial tools to compare costs and benefits of these programs, and the development of a talent marketplace that connect employers, students, and jobseekers, are important for student postsecondary success.

However, we are concerned that the proposed priority's background statement dismisses the value of bachelor's degrees and frames career pathways as an alternative to college. This statement overlooks extensive [research](#) showing that, on average, students have access to better lifetime earnings and opportunities for upward mobility when they earn a bachelor's degree. Instead of positioning career pathways in opposition to college, **the Department should recognize that bachelor's degrees, alongside other postsecondary options, are part of some career pathways and ensure that students have real choices of both degree and non-degree pathways that lead to jobs with opportunities for career advancement and a family-sustaining wage.** We must build systems that promote lifelong learning, upskilling, and

reskilling that do not foreclose on future opportunities for students and workers to choose to pursue further education, inclusive of a baccalaureate and beyond.

Moreover, the proposed priority lacks any accountability measures or equity provisions. This is particularly alarming given the long [history](#) of tracking students of color, students with disabilities, multilingual learners, and students from low-income backgrounds out of four-year degrees and into vocational tracks that lead to low-wage jobs. In turn, impeding the economic mobility and thriving of traditionally underserved students is at odds with the Department's stated aim of fostering sustained economic competitiveness for the nation. While today's Career and Technical Education (CTE) integrates academic preparation and technical skills and is significantly more comprehensive than the vocational education of the past, systemic barriers to information and access to high-quality opportunities persist and perpetuate deep inequities for traditionally underserved students. The building blocks of CTE in high school and Perkins program quality indicators in high school and beyond are earning college credit, earning industry-recognized credentials, and engaging in work-based learning. Occupational segregation still exists in modern CTE, especially when it comes to gender as outlined in the Department's March 27, 2024 [Dear Colleague letter](#).

To ensure that grants funded under this priority are advancing equitable access to high-quality pathways, **the Department should (1) encourage states to adopt meaningful accountability and outcome measures for their career pathways and workforce readiness programs; (2) prioritize proposals that include requirements for disaggregated reporting of student participation and outcomes by race, income, and other student characteristics; and (3) ensure that these proposals require at least two of the approaches outlined in the proposed priority.** In doing so, the Department should provide states with guidance on how to develop success measures that hold schools and districts accountable for providing in-demand industry credentials and high-quality, work-based learning opportunities as well as student outcomes after high school.

To maximize equitable outcomes, **the Department should prioritize funding to states that set up structures to provide additional support to students with the highest needs, and consider providing states seeking to set up such structures with targeted resources to do so.** For example, Texas awards funding to districts based on the number of students who meet [college, career, and military readiness](#) (CCMR) criteria, with additional funding for economically disadvantaged or special education students who meet the benchmarks. This outcome-based, equity-driven approach incentivizes high-quality postsecondary pathways for all students, with particular attention to those with the greatest needs.

We recognize the value of supporting various individual components of pathways, such as industry-recognized credentials as outlined in Proposed Priority (a)(vi), work-based learning in (a)(vii), and pre-apprenticeships and registered apprenticeships in (a)(viii). Each of these components, when implemented effectively, has demonstrated substantial benefits for student achievement, postsecondary access, and long-term success. However, evidence from integrated pathway models such as Texas' [Rural Pathway Excellence Partnership](#) and California's [Linked](#)

[Learning](#) demonstrates that students achieve stronger outcomes when these components are combined. There is an urgent need to invest not just in individual programs, but in [integrated pathways](#) that combine each of these components with rigorous academics and personalized guidance. Therefore, **the Department should prioritize proposals that implement pathways that offer students *each of these***: (1) opportunities to earn postsecondary credits through dual enrollment or concurrent enrollment; (2) opportunities to earn high-value, high-wage, in-demand, industry-recognized credentials; (3) access to work-based learning experiences; *and* (4) comprehensive postsecondary and career counseling.

While we appreciate the innovation of connecting education, pathways, and employment as outlined in Proposed Priority (d), the proposed definition of talent marketplace is overly vague and lacks critical safeguards. This priority promotes investment in digital systems powered by Artificial Intelligence (AI) without addressing mechanisms to mitigate AI biases, student data privacy, and the essential role of human advisors and counselors who can build relationships and connect students to opportunities based on their evolving talents, strengths, and aspirations. **The Department should establish guardrails for developing and deploying these technologies** so they can truly help break down silos, improve transparency and efficiency, and lead to better student outcomes.

In addition, we urge the Department to also augment its proposed priority to consider supporting projects that create opportunities for early career exploration prior to high school. [Research](#) suggests that middle school is an ideal time to expose students to diverse, relevant, and hands-on experiences. Such work is underway in states such as [Connecticut](#), which requires districts to develop an individualized Student Success Plan (SSP) that provides each student with support in setting goals for academic, career, social, emotional, and physical development that meet rigorous high school and postsecondary expectations, starting in sixth grade.

The Department's proposed priority includes projects that "provide opportunities for students to use financial tools to compare the cost and benefits of the career options and educational pathways they are considering, including the long-term impact of taking out student loans on their financial security, including likely entry and mid-career earnings in fields selected by students as compared to entry and mid-career earnings in high wage, high growth, and high demand occupations in each of the career clusters." We support efforts to bridge the information gap and create accessible data students can use to better understand their pathway options. The Department should use this as an opportunity to align data reporting requirements in the Gainful Employment and Financial Value Transparency regulations and the new earnings metric created by the One Big Beautiful Bill Act to publish accessible information on all program types and associated earnings, and in the case of Workforce Pell programs, completion, job placement, and earnings.

In closing, we appreciate the opportunity to comment on the Department's Proposed Priorities regarding Expanding Career Pathways and Workforce Readiness. As a nation, we have an obligation to ensure that every student has the chance to pursue their dreams and contribute their talents to society. Prioritizing access to demand-driven career pathways and workforce

preparedness is essential to putting pathways in reach for all. However, it must be done with care, and cannot be accomplished with a narrow view of pathways that excludes college as a crucial part of some career pathways. As the Department works to finalize the Proposed Priority, we would be happy to discuss these comments further with you and your team.

Sincerely,

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