



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,

All4Ed appreciates the opportunity to provide comments 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 continued emphasis on reimagining high schools to better prepare students for both college and careers. The Expanding Career Pathways and Workforce Readiness priority reflects a strong, research-based understanding that high school should serve as a launching pad toward meaningful postsecondary opportunities, economic mobility, and civic engagement.

We especially support the priority's focus on:

1. Developing industry-led sector partnerships
2. Promoting the attainment of in-demand and high-value recognized postsecondary credentials
3. Providing work-based learning opportunities for which a student receives wages, academic credit, or both;
4. Expanding the availability of pre-apprenticeships and registered apprenticeships.

COMMENTS ON PROPOSED PRIORITY COMPONENTS

(a) Support Workforce Development Programs That Are Aligned with State Priorities

All4Ed strongly supports the Department's emphasis on aligning workforce development with state priorities. However, several critical improvements are needed to ensure these programs serve all students effectively, particularly those from historically underserved and rural communities. Below we offer specific suggestions on strengthening the proposed priority's subcomponents.

(a)(i) Activities aligned to State and local workforce priorities.

This proposed priority has the potential to create more connection and coherence across education, workforce, and economic development. In this subcomponent, All4Ed recommends

requiring alignment with the Perkins Career and Technical Education (CTE) Comprehensive Local Needs Assessment (CLNA) process, which must be done every two years to align CTE programs to labor market demand. The CLNA should also inform state and local workforce priorities, and it could be administered and/or analyzed in partnership with regional and state workforce development boards.

CTE and workforce programs should also be used to inform economic development at the state and local levels. Similarly, any surveys or processes used to determine new or expanded state and local economic growth areas should shape workforce and education programming to ensure that CTE programs are not just responsive to the labor market as it is today, but are also positioning CTE programs to develop the talent our nation's communities need to lead and work into the future.

(a) (ii) Activities that support alignment of workforce activities across State agencies that support workforce development (e.g., education, higher education, workforce transformation, job and family services, vocational rehabilitation services including pre-employment transition services and transition services, etc.).

The Department should encourage states to engage key state agencies and entities beyond the workforce community, including representatives from agencies such as the Departments of Health and Human Services, Transportation, Energy, and others that both understand the evolving skill needs in their fields and are employers, themselves.

All4Ed recommends **adding “correctional education and training, and reentry services” to the illustrative parenthetical list of examples**, given that over 90% of people who are incarcerated will eventually return home to their communities and need workforce development services prior to release and as a support throughout reentry into society.

(a)(iii) Activities that support States in identifying in-demand and high-value industry-recognized credentials and/or re-evaluating existing lists of credentials.

All4Ed strongly supports this approach to credentials that are both in-demand and high-value, but the **Department must provide clear definitions of these terms. We recommend the Department adopt the following framework:**

- **In-demand credentials** should include both those currently requested by employers with demonstrated job openings and those for an ever-changing world.
- **High-Value Credentials** should meet specific criteria, including:
 - Lead to occupations with family-sustaining wages
 - Show strong wage progression over time
 - Include pathways to further education and career advancement
 - Have validated transferability across employers and regions

Without this clarity, learners are at risk of investing time and effort in low-value credentials that do not lead to strong employment outcomes. Demand alone is not a signal that a credential will improve earnings or support career advancement. Clear definitions and an

emphasis on both demand and value will ensure that [state](#) and federal investments, including via Workforce Pell, in industry-recognized credentials pay off.

Additional federal guidance is especially important given that, [according to Advance CTE](#), only 23 states use wage data and only 24 use occupational demand to identify credentials of value—and just eight states report that they have the ability to access and use data that demonstrates credential outcomes. To strengthen this priority, **All4Ed recommends that the Department leverage this opportunity to encourage states to strengthen their systems for validating credentials**, including adopting the recommendations for states put forth by Advance CTE:

- **Build a Cohesive Framework:** Create a unified decision-making framework that brings together K-12, postsecondary, and workforce sectors. Center this framework on robust labor market information, including wage and demand data, as well as employer input, ensuring that credentials required for jobs truly are responsive to and align with the skills and knowledge needed for those positions.
- **Unify Credential Lists Across Systems:** Encourage states to develop unified or coordinated credential lists to minimize confusion for learners and better align K-12, postsecondary, and workforce programs.
- **Align with Accountability:** Integrate credential attainment into accountability systems and funding models, while ensuring approved credentials reflect true labor market value.

(a)(iv) Providing support for the skilled trades.
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While All4Ed supports expanding opportunities in skilled trades, a sole focus on the skilled trades is out of step with both cutting-edge efforts in the workforce development sector and the Trump-Vance Administration’s priorities. For example, in June, the U.S. Department of Labor (DOL) [awarded \\$84 million](#) in grants to support Registered Apprenticeship in both traditional industries such as the skilled trades *and* emerging industries. These awards continued an emphasis in the workforce development field on the importance of expanding apprenticeship in “non-traditional” industries such as health care and information technology. As DOL noted in June, the inclusion of non-traditional sectors supports multiple executive orders issued by the Trump-Vance Administration, including “[Advancing Artificial Intelligence Education for American Youth](#).” **We recommend that the Department remove this provision and instead encourage alignment to sectors identified via the CLNA process mandated by Perkins**, which allows for support for vital emerging industries while simultaneously ensuring alignment with state and local workforce demand—including in the skilled trades.

(a)(v) Developing industry-led sector partnerships.
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All4Ed supports the inclusion of industry-led sector partnerships in the proposed priority. Sectoral training programs are an [evidence-based approach](#) to workforce development that need the backing of the federal government, as well as philanthropy and employers, in order to succeed. However, **industry-led sector partnerships often do not include intentional strategies for partnering with K-12 education systems and other education and training providers**, such as community-based organizations, that serve in-school and out-of-school youth. In light of the Department’s interest in expanding pre-apprenticeship, registered apprenticeship, and other career pathways opportunities for in-school and out-of-school youth,

we recommend that the Department include additional guidance on the partners to be engaged with the sector partnerships supported by this priority.

(vi) Promoting the attainment by individuals of an in-demand and high-value industry-recognized postsecondary credential.

All4Ed applauds the Department for taking into account the full array of postsecondary credentials in its definition, including the baccalaureate degree. Most of the nation's high-wage, high-growth occupations require education or training beyond high school to access top earnings. According to the [Georgetown University Center on Education and the Workforce](#), by 2031, [72% of all jobs](#) in the U.S. will require education or training beyond high school. In addition, only [15% of good jobs](#) will be accessible to workers with only a high school diploma, while 66% of good jobs will require bachelor's degrees. Similarly, the [Bureau of Labor Statistics](#) projects that the [majority of high-wage occupations](#) (those with median annual wages above \$70,000) require some form of postsecondary education.

However, **the proposed priority does not provide a definition of “in-demand and high-value industry-recognized postsecondary credentials”** and instead encourages activities that support states in identifying credentials that meet those requirements in section (a)(iii). **We therefore recommend that the language specify that credentials should align to the criteria established by states under section (a)(iii).**

(a)(vii-viii) Providing and expanding work-based learning opportunities, including pre-apprenticeships and registered apprenticeships.

All4Ed strongly supports the proposed priority's emphasis on the expansion of work-based learning opportunities, including internships, externships, pre-apprenticeships, and registered apprenticeships. We especially applaud the priority's emphasis on compensating work-based learning participants with wages and academic credit. We recommend further clarifying this point by specifying that registered apprenticeships **must** include [paid employment](#). We also recommend that this priority align with and directly cite the U.S. Department of Labor's (DOL) guidance on quality pre-apprenticeships in [Training and Employment Notice \(TEN\) No. 23-23](#), which ensures that pre-apprenticeships create on-ramps to high-quality Registered Apprenticeship Programs (RAPs) and recommends wages or stipends for pre-apprenticeship participants.

The proposed priority's reference to “expanding the availability of pre-apprenticeships and registered apprenticeships, including through dual or concurrent enrollment” needs clarification and elaboration. Incorporating dual and concurrent enrollment courses within pre-apprenticeships and RAPs that serve high school students, [including in the related technical instruction required in RAPs](#), is a best practice long [recognized in the field](#) and included in [TEN No. 23-23](#). All4Ed strongly supports the continued inclusion of these dual and concurrent enrollment opportunities for high school students participating in pre-apprenticeships and RAPs. However, it is unclear how these opportunities might serve as a mechanism for a broader

expansion of pre-apprenticeships and RAPs, given that they are classroom-based and do not include structured on-the-job training.

All4Ed also supports the priority’s emphasis on expanding access to work-based learning for in-school and out-of-school youth, particularly through mechanisms that strengthen the nation’s apprenticeship system, such as support for intermediaries and technical assistance to states. The Department should also address how to ensure apprenticeship programs are accessible to all young people, including those with disabilities and English learners. In addition, the **Department should encourage programs that explicitly help students build professional networks through mentorship, industry exposure, and social capital network-building opportunities.**

(b) Provide career and college exploration and/or advising opportunities

This section contains a critical flaw that must be addressed. While the Department’s focus on workforce readiness to foster both economic mobility for students and sustained competitiveness for the nation is critical, **the proposed priority reinforces the false binary between careers and college.** [Research](#) consistently shows that most good-paying jobs require some level of postsecondary education or training. Career pathways should not be framed as alternatives to college, but rather as inclusive of college opportunities, including those offered by community colleges, which play a central role in career preparation and transfer.

To make this clearer, the Department should revise the language in paragraph (a) to emphasize **“and” rather than “or.”** **Suggested edit for paragraph (b):**

“Provide career ~~and/or~~ college exploration and advising opportunities to promote greater awareness of the range of postsecondary educational and career options.”

This small but meaningful change would help reinforce that college and career pathways should be integrated, not siloed, in order to achieve the Department’s goals. We cannot afford to put the risk on our most vulnerable populations by limiting their access to comprehensive pathways that include the full range of postsecondary options. As employer needs and economic conditions change rapidly, learners and workers need access to advising that positions them to make informed decisions about how to navigate the complex landscape of available education and career options. Additionally, advising should include one-to-one [counseling and navigation support](#). The Department should acknowledge that effective career and college advising requires systematic counseling that helps students understand how programs work and the potential long-term outcomes of their choices.

(c) 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.

All4Ed appreciates the Department’s focus on outcomes over time. While providing financial tools to students is an important starting point, these tools can be misleading without clear, comprehensive data. **The Department should *also* explicitly require that financial tools include clear disclosure on the stackability and portability of industry-recognized credentials and on transfer pathways** and how credentials connect to further education opportunities.

Financial tools should also help learners understand dual enrollment as a cost-saving strategy. Earning college credit while in high school through dual or concurrent enrollment offers a proven strategy to reduce costs and time to postsecondary credentials, thus minimizing or reducing the need for students to take out loans. [All4Ed research](#) shows that students who participate in dual enrollment are more likely to enroll in college, persist, and complete degrees compared to their peers, and they can save an average of \$12,600 in college costs by earning transferable college credits early. Strengthening paragraph (c) to explicitly highlight dual credit as a cost-saving and debt-reduction strategy would align the priority with evidence-based approaches to affordability. **Suggested language for paragraph (c):**

“Provide opportunities for students to use financial tools to compare the costs and benefits of the educational and career pathways they are considering, including the long-term financial **implications of student loans, the wage trajectories of different fields, and how credits earned through dual enrollment can be applied toward degrees to reduce time and cost.**”

(d) Support the Development of Talent Marketplaces

While we support the development of talent marketplaces, **we encourage the Department to prioritize proposals that demonstrate strong cross-sector regional collaboration and systems alignment.** Career pathways work best when K-12, postsecondary, and workforce institutions and systems, employers, economic development agencies, and intermediaries and community-based organizations work together toward shared goals. In the absence of this collaboration, the efficacy of technical solutions such as credential registries and learning and employment records will be limited. The Department should incentivize proposals that break down silos and create coherent pathways from education to employment.

ADDITIONAL CONSIDERATIONS

Leveraging Existing Federal Indicators for Greater Impact

The proposed priority appropriately emphasizes alignment with state workforce priorities, and work-based learning, industry-recognized credentials, and career advising. As outlined in [Perkins V \(Section 113\(b\)\(2\)\(A\)\(iv\)\)](#), states must select at least one of the three secondary program quality indicators—postsecondary credit attainment, industry-recognized credential attainment, or work-based learning—to include in their accountability systems. These ‘building blocks’ of CTE should be integrated, rather than siloed, to strengthen career pathways. **We encourage the Department to require states and grantees to offer at least two—ideally all three—of these experiences for students.** Under current law, states are only required to select and report on one of these measures; raising that bar would strengthen program coherence and quality.

Equity and Disaggregated Reporting

To ensure that grants funded under this priority are advancing equitable access to high-quality pathways, the Department should **prioritize proposals that include requirements for disaggregated reporting of student participation and outcomes by gender and race, and the special populations categories as defined in Perkins V in [Section 3\(48\)](#), namely:**

- (A) individuals with disabilities;
- (B) individuals from economically disadvantaged families, including low-income youth and adults;
- (C) individuals preparing for non-traditional fields;
- (D) single parents, including single pregnant women;
- (E) out-of-workforce individuals;
- (F) English learners;
- (G) homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- (H) youth who are in, or have aged out of, the foster care system; and
- (I) youth with a parent who
 1. is a member of the armed forces (as such term is defined in section 101 (a)(4) of title 10, United States Code); and
 2. is on active duty (as such term is defined in section 101(d)(1) of such title).
- (J) migrant students (secondary only)

Youth Development and Comprehensive Support

Career pathways must address the holistic needs of students. **We cannot afford to put the risks of pathways with uncertain outcomes or that lead to low-value jobs with dead ends to next steps on our most vulnerable populations.** The Department should encourage grantees to incorporate wraparound services and support systems that enable all students to succeed, including **connections to community supports such as [mental health services](#), [transportation assistance](#), and [other wraparound services](#) that enable students to fully participate in high-quality career pathway programs.** This is particularly critical for students from low-income backgrounds who may face multiple barriers to participation.

Conclusion

We appreciate the Department's commitment to strengthening career pathways and workforce readiness. With these suggested refinements, particularly ensuring the integration of career *and* college pathways, requiring definitions of high-value credentials, and maintaining focus on equity, this priority can better serve all students, particularly those from historically underserved and rural communities, by ensuring they have access to high-quality pathways that lead to both economic mobility and continued educational opportunities.

All4Ed stands ready to collaborate with the Department and leverage our deep bench of expertise, *from the Classroom to Congress*, to support the success of all our nation's young people on their journeys to family-sustaining careers and fulfilling lives.

For questions regarding these comments, please contact Rebeca Shackleford, Director of Federal Government Relations, at rshackleford@all4ed.org.

All4Ed is a national nonprofit advocacy organization committed to expanding equitable educational opportunities for students of color and those from low-income families. We advocate for policies that ensure all students graduate from high school prepared for success in college, career, and citizenship.