



Policy solutions that work for low-income people

March 4, 2019

Director of the Information Collection Clearance Division
U.S. Department of Education
550 12th Street SW
PCP, Room 9086
Washington, DC 20202-0023

RE: Docket ID: ED-2018-ICCD-0108-0032

Dear Kate Mullan:

Thank you for the opportunity to comment on the Information Collection Request (ICR) on the Guide for Submission of State Plans related to the Strengthening Career and Technical Education for the 21st Century Act (Perkins V).

CLASP is a national, nonpartisan, anti-poverty nonprofit advancing policy solutions for low-income people. We develop strategies for reducing poverty, promoting economic opportunity, and addressing barriers faced by people of color. We believe high-quality career and technical education (CTE), particularly at the postsecondary level, can help low-income learners and learners of color move along career pathways into jobs with self- and family-sustaining wages.

Text Box on Career Pathways

1830-0029 Perkins V State Plan Guide - Responses to Public Comments reads, in part:

“One commenter noted that the term “career pathways” is often used as a general term with many different meanings depending on the context. The commenter indicated that, now that Perkins V has adopted the statutory definition under WIOA, it is important that OCTAE and the CTE community use the term as Congress intended. They recommended that a text box with the statutory definition be added to the guide.

“Department’s Response: We appreciate the commenter’s input and have added Text Box 2: Definition of Career Pathway.”

CLASP appreciates the Department’s intent to include a “Text Box 2: Definition of Career Pathway.” Unfortunately, it appears to have been inadvertently omitted from the actual ICR document. We suggest adding a text box with the content below. We do not have specific comments on the format of citations.

Text Box 2. Definition of Career Pathway

“(8) CAREER PATHWAYS.—The term ‘career pathways’ has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act ([29 U.S.C. 3102](#)).”;

(Section 7(7) of Perkins V)

(7) Career pathway.--The term “career pathway” means a combination of rigorous and high-quality education, training, and other services that--

- (A) aligns with the skill needs of industries in the economy of the State or regional economy involved;
- (B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an “apprenticeship”, except in section 171);
- (C) includes counseling to support an individual in achieving the individual's education and career goals;
- (D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- (E) organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
- (F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and
- (G) helps an individual enter or advance within a specific occupation or occupational cluster.

(Section 3(7) of the Workforce Innovation and Opportunity Act [Public Law 113-128])

Thank you again for the opportunity to provide comments. Please contact me if you have any questions.

Sincerely,

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