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**President & CEO**  
Vanita Gupta

June 22, 2017

**H.R. 2353, The Strengthening Career and Technical Education for the 21st Century Act**

Dear Representative,

On behalf of the Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States, and the 18 undersigned organizations, we are writing to express our concerns regarding the Strengthening Career and Technical Education for 21st Century Act (H.R. 2353). While the bill includes many important changes to modernize the Perkins Career and Technical Education (CTE) program and better align it with the Workforce Innovation and Opportunity Act (WIOA), it remains a flawed compromise due to its rollback of the federal role in holding states accountable for performance. Reauthorization of the Perkins CTE Act should strengthen and build on the nation's career and technical education programs and as such, should preserve the secretarial authority needed to ensure programs are of high quality and effectively serve students, especially those facing the greatest barriers. **We urge Congress to strengthen the accountability provisions of this legislation before final passage.**

High-quality career and technical education can provide a critical option for students to achieve the skills and knowledge they need to pursue the careers of their dreams and compete in the 21<sup>st</sup> century economy. Too often, however, girls, women, students of color, and students with disabilities find their futures and possibilities limited by tracking into low-quality "voc-tech" programs that reinforce gender stereotypes, hold students to low expectations, and fail to prepare students for success in postsecondary education and high-wage careers.

The federal investment in career and technical education should focus on opening doors to high-quality preparation that expands opportunity and provides access to high-skilled, high-wage work for all students—especially those who have historically been denied such opportunities. Unfortunately, H.R. 2353 weakens the role of the Secretary of Education in holding states accountable for meeting the law's civil rights purposes. Under the current Perkins CTE law, states failing to meet at least 90 percent of their targeted performance levels are required to implement program improvement plans—and those plans must give "special consideration to performance gaps" for the "special populations" defined in the law and other marginalized groups. The federal agency negotiates goals with states and holds them accountable for meeting these goals with sanctions, to ensure that federal investment is used to support student outcomes.

In contrast, under H.R. 2353 waters down current law and asks states to set their own equity goals without any input from, or negotiation with, the U.S. Department of Education; further, the bill weakens secretarial authority to enforce the requirements under the law through the use of sanctions. Although the bill makes an important change to shorten the program's grant



cycle (aligning it with the WIOA timeline), which would require action to address underperformance more quickly than in current law, other changes to current law would undermine the Secretary's historical role in ensuring equity and opportunity in educational programs. While greater state level engagement in the development of state plans is a worthwhile goal, it should go hand-in-hand with the Secretary's explicit authority to intervene at all stages of the process if targets are insufficiently ambitious or are not being met.

We recognize that much work has gone into this long-overdue reauthorization and that important changes have been made in response to lessons learned about program coordination and alignment, especially with WIOA and the Higher Education Act. However, the bill in its current form is a flawed compromise in need of improvement.

During committee consideration of H.R. 2353, several Members raised significant concerns about the critical federal role in accountability for CTE programs to ensure equity of opportunity, so that all students, regardless of background, can access and benefit from high-quality career and technical education programs that receive federal funding. While this bill has been listed for fast-track consideration in the House this week, we wish to reiterate our concerns about this issue. We urge members of both chambers to work together to restore federal sanctions provisions to hold state CTE systems accountable for maintaining progress toward success for all students, and to preserve the Secretary's ability to negotiate with states and ensure CTE programs expand equity and opportunity for special populations.

Thank you for your consideration of our views. Please do not hesitate to contact Liz King, Leadership Conference Director of Education Policy, at [king@civilrights.org](mailto:king@civilrights.org) or (202)466-0087 if you have any questions.

Sincerely,

The Leadership Conference on Civil and Human Rights  
American Association of University Women (AAUW)  
American-Arab Anti-Discrimination Committee  
The Arc of the United States  
Association of University Centers on Disability  
Center for Law and Social Policy (CLASP)  
Council of Parent Attorneys and Advocates  
Judge David L. Bazelon Center for Mental Health Law  
Lawyers' Committee for Civil Rights Under Law  
League of United Latin American Citizens  
National Alliance for Partnerships in Equity (NAPE)  
National Center for Transgender Equality  
National Disability Rights Network  
National Down Syndrome Congress  
National Urban League  
National Women's Law Center  
PolicyLink  
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TASH