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U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

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NAF is pleased to provide comments on the proposed priorities, requirements, definitions and selection criteria for the Perkins Innovation and Modernization Grant Program (PIM) to improve and modernize career and technical education (CTE).

NAF is a national nonprofit organization that brings together education, business, and community leaders to ensure high school students are college, career, and future ready. For over 40 years, NAF has partnered with high schools in historically underrepresented communities to enhance school systems by implementing NAF academies – small, focused learning communities within traditional public high schools themed around growing industries, including engineering, finance, health sciences, information technology, and hospitality and tourism.

NAF academies connect the classroom to the workplace by integrating career-focused curricula and hands-on, industry-guided learning projects into the traditional high school experience. With a rigorous program of study and a progressive continuum of work-based learning activities designed to build career awareness, exploration, and preparation, students gain the skills and knowledge necessary to make informed choices and be successful in their future careers. NAF promotes open enrollment in our career academies, allowing students of all backgrounds and capabilities to participate and helping address systemic, educational, and professional barriers faced by marginalized populations.

The NAF career academy design is replicable, sustainable, and cost-effective, and because it integrates within public schools, supports lasting systemic reform and equity nationwide. NAF has grown from one NAF Academy of Finance in New York City to hundreds of academies across the country and supports programs of study that are aligned with the National Career Clusters Framework. During the 2022-23 school year, more than 112,000 students attended over 600 NAF academies across 34 states and territories. In 2022,



NAF academies reported 99% of seniors graduated with 88% of graduates planning to go to college.

In the proposed rule, *Proposed Priority--Career-Connected High Schools*, the third pillar is drafted as follows: “Participation in work-based learning opportunities (as defined in section 3 of Perkins V) for which students receive wages or academic credit, or both; and”

[Work-based learning as defined by Perkins V section 3: “*The term ‘work-based learning’ means sustained interactions with industry or community professionals in real workplace settings, to the extent practicable, or simulated environments at an educational institution that foster in-depth, firsthand engagement with the tasks required in a given career field, that are aligned to curriculum and instruction.*”]

As cited from NAF’s own publication in the Department’s proposed rule, “work-based learning reinforces academic instruction by giving students opportunities to apply knowledge and skills in real-world situations and to learn how to be professionals at work. Work-based learning can help young people generate income, establish future earning potential, connect with professionals and mentors in the labor market, and build professional networks.”

In NAF’s many years of experience, we’ve found that **paid work-based learning experiences, such as paid internships**, improve career development and lead to higher levels of satisfaction for students than unpaid internships. In addition, limiting internships to those who can afford them simply perpetuates existing inequities – allowing those who can afford to work for free to gain meaningful experiences and build professional networks. To address workforce shortages facing many sectors, experts have emphasized the need to start their outreach earlier in high schools to elevate student engagement and generate greater interest in the careers that are in demand and paid work-based learning experiences are an effective opportunity for this engagement.

**For the aforementioned reasons, we strongly encourage the Department to ensure throughout the final rule for the PIM to include paid work-based learning and academic credit and include paid work-based learning as a selection criteria for applications.**

In the second *Proposed Priority--Partnership Applications*, NAF applauds the inclusion of additional community stakeholders to implement successful



projects. **However, priority should be given to applicants for partnership application projects that include an entity that can coordinate the essential work-based learning opportunities for the students with all of the relevant stakeholders.** Work-based learning coordinators are essential to develop the infrastructure necessary for ensure quality work-based learning and can conduct outreach, engagement, recruitment, and coordination of paid work-based learning activities. These invaluable coordinators can assist with activities as preparing students for their work-based learning experiences, placing students in appropriate roles, providing support beyond the purview of employers' human resource departments, and evaluating success.

Finally, studies have found that young people who explore career options, take part in work-based learning activities, and build professional networks while in high school are better prepared to enter and excel in the workforce from an earlier age. It is particularly beneficial for students to explore career opportunities while enrolled in the public education system so that they have a better understanding of their interests before pursuing and paying for increasingly costly post-secondary education.

In the proposed definition for personalized postsecondary educational and career plan, the definition specifies tasks such as applying for postsecondary education or completing applications for employment. However, before a high school student can reach these milestones, the student must explore and experience first-hand postsecondary opportunities. **We strongly recommend the final definition be expanded and delineated to include informational interviews, job shadow, and mock interviews.** This will enable a student to truly develop a personalized postsecondary education and career plan. **In turn then, it should be added to the proposed selection criteria under (b)(5)“Quality of the project Design.”**

Thank you for the opportunity to provide comments.