December 12, 2023

The Honorable Virginia Foxx  
Chairwoman, Committee on Education and the Workforce  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Robert C. "Bobby" Scott  
Ranking Member, Committee on Education and the Workforce  
United States House of Representatives  
Washington, D.C. 20515

Dear Chairwoman Foxx and Ranking Member Scott:

On behalf of NAF, a national non-profit bridging the gap between high schools and businesses to better prepare students for future success, we thank you for your leadership in introducing A Stronger Workforce for America Act, H.R. 6655, to reauthorize the country’s workforce development system. Currently, our nation faces an unprecedented demand for skilled workers, which must be addressed through better alignment of our education and workforce systems. As I shared during my Hill meetings last month, breaking down the siloes between secondary education and the workforce to provide work-based learning opportunities to high school students is critical. Employers must play an active role in developing a talent pipeline aligned with their workforce needs.

Opportunities for work-based learning for in-school high school students is essential to ensure youth stay in school and are connected to essential economic supports and services. Reaching youth through career preparation programs in high school can prevent drop-out and supports workforce development. There is overwhelmingly consistent and longitudinal data that illustrates the significant positive, long-term impact of high school graduation. Earning potential increases and incarceration rates decrease, helping to break the cycle of poverty while contributing to a stronger economy and healthier individuals, families, and communities.

Currently, the law skews funding for youth activities to be allocated toward opportunity youth versus in-school youth and directly conflicts with the aforementioned goals. H.R. 6655 proposes reducing the requirement for the allocation for opportunity youth to 65 percent at the state level and allowing local areas the flexibility to allocate funding according to their needs. NAF appreciates these proposed changes and the inclusion of homeless and foster youth as opportunity youth regardless of their school status. As we have shared with the Committee previously, in addition to foster and homeless youth, we encourage youth living in high-poverty areas and youth eligible for free or reduced lunch to also be eligible regardless of school status.

As NAF has noted previously there are multiple and varying definitions of work-based learning in federal law, we greatly appreciate defining work-based learning in H.R. 6655 as the same definition in the Carl D. Perkins Career and Technical Education Act of 2006. NAF agrees that 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.” We hope this common definition will foster opportunities to better align education programs at the secondary education level with workforce training programs.

NAF strongly believes that state and local CTE secondary educators and administrators must be engaged with and serve on the state and local workforce boards. In order to prepare high school students for the workforce, state and local educators must know and understand the workforce demands and align their programs to those needs. NAF appreciates that H.R. 6655 encourages local workforce boards to align career pathways with the career and technical education programs of study in the local area. In an expansion of allowable activities, NAF is pleased to see the addition of raising public awareness about career and technical education programs and through avenues such as “public service announcements, such as social media campaigns and elementary and secondary school showcases and school visits” and including awareness of community-based and youth services organizations.

As we have shared with the Committee before, summer and year-round employment opportunities are critical programs to provide work-based learning opportunities to youth. NAF believes strongly that students should be paid for their work. We appreciate that H.R. 6655 requires internships over four weeks in summer and eight weeks during the school year be paid and would encourage the Committee to consider requiring paid internships no matter their length as to better engage youth in their experience and allow them to receive an often-needed income.

Work-based learning is a proven way to grow the talent pipeline and help prepare students to be future ready, whether students start directly in the workforce, begin an apprenticeship, or head to a community or four-year college. Work-based learning equips students with the essential skills, aspirations, and connections needed in any environment and prepares them to be adaptable wherever life’s journey takes them. Updating our workforce development system to **better support in-school youth and unify federal education workforce laws**, will ensure our future workforce will have the skills they need to succeed, and employers will have the diverse talent they need to thrive.

Please contact Jennifer Pautz, Assistant Vice President, Policy & Advocacy, jpautz@naf.org, should you have any questions. NAF looks forward to continued engagement with policymakers as the bill moves through the legislative process.

Sincerely,

Lisa Dughi  
CEO | NAF

---

#BEFUTUREREADY
naf.org