



October 27, 2025

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

Re: Docket ID ED-2025-OS-0679

The American Association of Community Colleges appreciates the opportunity to submit comments on the proposed new priority for grant programs: Expanding Career Pathways and Career Readiness. Given that workforce development is central to the mission of AACC's member colleges, this proposed priority is of great interest to them.

AACC applauds the proposed priority's emphasis on supporting secondary and postsecondary-level activities that would help students become more aware of, and participate in, educational programs that lead to "active participation in sectors of the economy shaped by technological advancement, innovation, and industrial renewal."

Community colleges have long been the nation's leading provider of a wide range of non-degree and degree programs that are designed in concert with industry partners to lead to meaningful employment opportunities. Applied appropriately, this priority will underscore those efforts. We applaud the Department's identification of several issues that challenge community college workforce development efforts, including student awareness of the options available to them, particularly at the K-12 level; alignment of programs at the state and federal level; the availability of timely workforce data; and the complexities of providing work-based learning opportunities. AACC is glad to see that the priority addresses these and many other significant aspects of the community college mission.

AACC has been directly involved in the federal government's efforts to increase the number of registered apprentices and strongly supports this aspect of the priority as well. Finally, the priority's inclusion of "activities that support States in identifying in-demand and high-value industry-recognized credentials and/or re-evaluating existing lists of credentials" will assist in the implementation of Workforce Pell Grants, a top AACC priority.

After adopting the final version of this priority, AACC urges the Department to apply it carefully. While the contents of the priority are laudable, they are not directly related to the overarching purposes of many of the higher education programs that the Department administers. AACC would be concerned about any application of this priority that would significantly skew these programs to purposes not envisioned in authorizing statutes. Aspects of the priority seem to be a natural fit for national-level grants made within the Perkins Career and Technical Education

program and Adult Basic Education programs and would perhaps further the administration's goal of better aligning those programs with the Department of Labor's workforce development programs.

AACC looks forward to working with the administration to further our mutual workforce development goals.

Sincerely,

A handwritten signature in cursive script, reading "DeRionne P. Pollard".

DeRionne P. Pollard, Ph.D.
President and CEO