



ALLEN COUNTY BOARD OF EDUCATION

570 OLIVER STREET
SCOTTSVILLE, KY 42164
(270) 618-3181

August 4, 2025

Nick Moore
Acting Assistant Secretary
Office of Career, Technical, and Adult Education
US Department of Education
400 Maryland Ave SW
Washington, DC 20202

RE: Federal Award V051F230120

Acting Assistant Secretary Moore:

We appreciate the opportunity to provide you with our request to reconsider the determination that our project is not aligned with the current priorities of the Administration, and to review our documentation supporting our position that our project does indeed align very closely with the Trump Administration's priorities.

From the campaign trail to the White House, President Trump has had a focus on jobs for hardworking American people who keep our country running, and their importance to America's future prosperity. In February of this year, in President Trump's proclamation designating February as Career and Technical Education Month¹, he stated in part:

"Under my leadership, America will once again champion a culture where hard work is rewarded and equip our people with real skills for real careers that our communities are in desperate need to fill. During my first term, I proudly signed the Strengthening Career and Technical Education for the 21st Century Act, which provided millions of students with excellent vocational opportunities. ...

"My Administration will invest in the next generation and expand access to high-quality career and technical education for all Americans. We will unleash the enormous potential of the American people and provide students and workers with the necessary skills training to ensure that our Nation dominates the 21st century. ...

¹ <https://www.whitehouse.gov/presidential-actions/2025/02/career-and-technical-education-month-2025/>

In the President's April 23, 2025 Executive Order entitled: "Preparing Americans for High-Paying Skilled Trade Jobs of the Future,"² Section 2 lays out the Policy for this Executive Order:

"It is the policy of the United States to optimize and target Federal investments in workforce development to align with our country's reindustrialization needs and equip American workers to fill the growing demand for skilled trades and other occupations. My Administration will further protect and strengthen Registered Apprenticeships and build on their successes to seize new opportunities and unlock the limitless potential of the American worker."

And includes in Section 4(c):

"Opportunities, including through the Carl D. Perkins Career and Technical Education (Perkins V) Act and Federal student aid, to enhance connections between the education system and Registered Apprenticeships."

In addition, Secretary McMahon released a statement on April 23rd regarding the President's Executive Order,³ stating in part:

"... Not every student needs to attend a four-year university to enter a family-sustaining career. The Trump Administration will support communities across the country that are offering career-aligned programs like apprenticeships and dual enrollment to best meet the needs of their workforce. Our goal is to build on their success and align resources across the country to equip the next generation of American workers."

With the President's stated focus and intent as shared prior, as well as that of the Secretary, Allen County Schools and the Allen County Board of Education provides the following information to show that our 2023 Perkins Innovation and Modernization (PIM) grant project entitled P3: Pathways, Proficiency, and Promotion is fully aligned with the Administration's focus on career and technical education, preparing secondary students for the careers of the future.

As a local education agency and public school district, our project's goal is to:

Redesign Allen County Schools' college and career program and pathways to become innovative, cohesive, and purposeful in providing direct on-ramps for students to enter desired and rewarding careers, equip students with the keys to drive their future, and provide specific opportunities, training, and advancements (including dual-credit courses, early-college courses, Industry Recognized Credentials, apprenticeships, internships, etc.) which can set them up for success.

² <https://www.whitehouse.gov/presidential-actions/2025/04/preparing-americans-for-high-paying-skilled-trade-jobs-of-the-future/>

³ <https://www.ed.gov/about/news/press-release/secretary-of-education-statements-president-trumps-education-executive-orders>

This goal is accompanied by eight objectives to guide our work:

- Add high-demand (based on Workforce Development Board/Kentucky Department of Education determination) college and career pathways to provide more opportunities for students and begin meeting local, regional, and statewide labor market needs;
- Ensure the full availability of dual-credit and early-college options for students;
- Institute a cohesive, informative marketing and information campaign to ensure students and their parent(s) fully understand all available opportunities within the college and career space at Allen County Schools, and to ensure students are able to select the most desired, ideal path that meets their interest and future career pursuits;
- Provide focused, ongoing support for students throughout their preparation for college and career, by providing regular check-ins with the project's Career Counselor to ensure students are on-track for success in their chosen pathway;
- Provide support for students needing assistance obtaining uniforms, steel-toed shoes, interview attire, etc., and/or transportation to early college and/or work-based learning opportunities;
- Provide support for students through soft-skills training;
- Provide specific adaptive equipment and supplies as needed for students to participate in career courses and training; and
- Build strong partnerships with business and industry employers locally, regionally, and state-wide to provide work-based learning (i.e., apprenticeships, internships, etc.) and employment/career opportunities for students.

Our desire to pursue the Perkins Innovation and Modernization (PIM) grant program came as a direct result of a rather large need in our district based on our students' interests. We had many students interested in pursuing dual-credit and early-college options, and while a Kentucky scholarship is available to cover tuition for up to two dual-credit courses per year, students are allowed to take up to four total dual-credit courses per year (two per semester) in their junior and senior years. The additional two courses not covered by the scholarship are the responsibility of the student or their parent(s) to pay for. Unfortunately, while there was great student and parent interest in these two additional courses per year, the availability of finances to pay for the courses was not possible for a majority of our interested students. We also identified the need to revise and update our career and technical education offerings for our students to better meet local, regional, and state-wide occupational needs, as well as meet the interests of our students to help prepare them for the careers they would like to pursue. The PIM grant provided us with the opportunity to address all of these things, and in just one year under the PIM grant the work we were able to accomplish for our students was incredible.

In one year of PIM grant funding, we were able to accomplish the following:

- 21% increase in dual credit courses offered;

- 52.3% increase in students enrolled in dual credit courses, with 60% of enrollees receiving project-funded tuition support;
- 86% increase in students enrolled in early college courses with our post-secondary partners;
- 27.7% increase in students obtaining Industry-Recognized Credentials (IRCs), already exceeding our overall target of a 10% increase; and our students earned 234 certifications within seven categories;
- 100% of our 11th and 12th grade students participated in our job shadowing program (completing two job shadows each year within their declared CTE pathway), and we plan to extend this program to encompass grades 9 through 12 this school year (2025-2026);
- Developed four internship placement opportunities for students, including in fields such as teaching and learning, culinary arts, automotive, and health sciences;
- Developed three cooperative education opportunities for students, including in industrial maintenance, culinary arts, and business and marketing;
- Developed four new pre-apprenticeship programs (with credit from the program going towards full apprenticeship or postsecondary programs upon graduation), including: teaching and learning, industrial maintenance, health science (pre-nursing), and automotive; we plan to add five additional pre-apprenticeship programs with year two funding availability, including the following: construction, electrician, HVAC, plumbing, and diesel mechanics – all identified as having labor shortages in our region and state;
- Actively exploring ways to expand the availability of AI technology training this school year (2025-2026) beyond what we have done through Project Lead the Way, including more structured learning around AI concepts, and potentially specific coursework through our partnership with our local community and technical college;
- Implemented the use of SchoolLinks software to track all students CTE progress starting in middle school through high school, support course planning, log and track work-based learning experiences – making it easier for students to connect with employers and earn academic credits, and provide both students and parents the ability to follow their student's progression within their chosen career paths, graduation plans, and provide post-secondary planning tools; the platform is critical to aligning student career goals with industry needs, especially in STEM fields; and the platform ensures P3 staff make sure no student falls through the cracks;
- Implemented one on one career advising for all 7th-12th grade students – from exploratory through implementation of their identified career interest area;
- Partnerships with four state colleges/universities for our students; and
- Three new partnerships with regional and local employers for our students.

With all of these accomplishments for our students with just one year of funding, imagine what we would be able to accomplish with reinstatement of full funding!

As you can see from our work, our project is very much aligned with President Trump's (and the Secretary's) priorities for Career and Technical Education. This includes modernizing workforce programs for high-paying skilled trade jobs, and the goals of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), the April 2025 Executive Order, federal efforts to expand Registered Apprenticeships, early college access, and even toward training and education in AI technology.⁴ Our work through the PIM grant is directly contributing to the national imperative of reindustrialization and economic resilience as articulated in the President's April 2025 Executive Order. Through the development of pre-apprenticeships in high-demand trades (including HVAC, electrical, and diesel mechanics – fields identified as critical to national infrastructure and economic security) we are ensuring students in our rural county are prepared to fill skilled labor shortages which could threaten American productivity and security.

Our P3 project is a fiscally responsible investment with measurable return. With just one year of federal funding, we have exceeded most of our initial targets, and built replicable systems that will continue to deliver value long after the grant period. This is the type of high-leverage, low-waste investment that aligns directly with the Administration's approach to education and workforce reform.

The work of our project and its accomplishments could also serve as a model showing how small, rural school districts across the country can deliver high-impact, future-ready CTE programs for all students. Our model is scalable and replicable, and offers a blueprint for how school districts can meet federal workforce goals through local innovation and strategic partnerships.

We also feel it is necessary to address an additional question or pause the Department may have regarding the prior Administration's PIM grant program's incorporation of Absolute Priority 2. We would like to make clear that throughout our application for this program (including in our very first sentence addressing the Priority), and in the implementation of this project, the entirety of what we proposed and what we are doing is for all of our students and always has been. From the start we've been committed to designing a project that expands opportunities for, and meets the occupational interests of all of our students – no matter their ability levels, economic backgrounds, or demographics. We incorporated this deep commitment to all of our students by including support for our special needs/exceptional learners; providing transportation, work-based learning access, and one-one-one advising (for every student and their parent(s)) – things that directly meet identified needs. Because the Notice Inviting Applications for the 2023 PIM

⁴ <https://www.whitehouse.gov/fact-sheets/2025/04/fact-sheet-president-donald-j-trump-advances-ai-education-for-american-youth/>

grant program required all applicants “to meet both Absolute Priorities 1 and 2 to be eligible for a grant award,”⁵ we complied and addressed Absolute Priority 2.

It is our hope that the Department will be able to see all of our project accomplishments, forward-moving progress for our students, and what our students have been able to accomplish with just one year of funding, and reconsider and reinstate our funding for years two through five for this program. With an individual review and consideration of each grant project individually, the accomplishments thus far, the value of each project to its recipients, as well as the project’s alignment with the Trump Administration’s priorities for CTE, we believe you will see that we are fully aligned with the Administration in our work.

We appreciate the Department’s consideration of our request, and are available and willing to provide any further information you may require.

Sincerely,

Joseph Cosby, P3 Project Director, joseph.cosby@allen.kyschools.us

Travis Hamby, Superintendent, travis.hamby@allen.kyschools.us

Melissa Biggerstaff, Chief Academic Officer, melissa.biggerstaff@allen.kyschools.us

⁵ <https://www.federalregister.gov/d/2023-17226/p-38>