June 20, 2025

Mr. Zachary Rogers
U.S Department of Education
400 Maryland Avenue SW
Room 7W213
Washington DC 20202-6450

Docket ID ED-2025-OS-0020

Dear Mr. Rogers,

Thank you for the opportunity to share our comments in response to the Department's proposed priorities and related definitions for discretionary grants.

KnowledgeWorks is a national nonprofit organization focused on advancing the future of learning and preparing all students for graduation. We encourage state and local leaders across the country to reimagine K-12 education through personalized and competency-based education systems. We support the development of policies that sustain the growth of personalized, competency-based learning (PCBL) and develop new, more coherent visions of education systems capable of supporting all children.

KnowledgeWorks appreciates the Department's inclusion of competency-based education in the priorities and would like to offer a definition developed by state and local partners implementing this approach across the country. Additionally, we have four new priorities for your consideration related to high school redesign, assessment and accountability realignment, artificial intelligence (AI), and the nationwide teacher shortage.

Definition of Competency-Based Education

KnowledgeWorks supports the inclusion of competency-based education in the department's proposed priorities for discretionary grant programs. In our work with state and local partners, we have seen postsecondary and workforce readiness increase as students engage in real-world challenges that cultivate mastery of academic knowledge and durable skills such as critical thinking, collaboration, and problem-solving.

We suggest shifting the terminology to PCBL instead of competency-based education and including the seven-part definition below which was adopted by a technical working group of field leaders facilitated by the Aurora Institute.[1] The term PCBL combines personalized learning with competency-based education to ensure students receive tailored supports aligned to their interests and needs in an approach that focuses on outcomes, not arbitrary time-based structures. In fact, states including Utah (53F-5-501) and Washington (SB 5189 enacted in 2025), have codified PCBL using the same seven-part definition.

[1] Levine, E. & Patrick, S. (2019). What is competency-based education? An updated definition. Vienna, VA: Aurora Institute. https://aurora-institute.org/wp-content/uploads/what-is-competency-based-education-an-updated-definition-web.pdf.

A state, district or school implementing personalized, competency-based learning should meet all seven components of this definition:

- *Students are empowered daily to make important decisions about their learning experiences, how they will create and apply knowledge, and how they will demonstrate their learning.*
- *Assessment is a meaningful, positive, and empowering learning experience for students that yields timely, relevant, and actionable evidence.*
- *Students receive timely, differentiated support based on their individual learning needs.*
- *Students progress based on evidence of mastery, not seat time.*
- *Students learn actively using different pathways and varied pacing.*
- *Strategies to ensure equity for all students are embedded in the culture, structure, and pedagogy of schools and education systems.*
- *Rigorous, common expectations for learning (knowledge, skills, and dispositions) are explicit, transparent, measurable, and transferable.*

Additional Priorities

Along with establishing a clear definition of PCBL, KnowledgeWorks encourages the Department to consider the following four areas as additional priorities: high school redesign, assessment and accountability, artificial intelligence, and the teacher shortage.

1. High School Redesign

According to a 2025 LinkedIn report, today's professionals are expected to change jobs twice as often over their careers as those entering the workforce 15 years ago.[2] Additionally, over 20% of current U.S. hires hold job titles that didn't exist in 2000. Moreover, an America Succeeds analysis of 80 million job postings from 2020-2021 shows that seven of the top ten most-requested skills by employers are durable skills, which appear nearly five times more frequently than top hard skills.[3] Employers also report that young people are less ready than ever for the workplace, and one of their main challenges is a lack of durable skills like self-awareness and verbal communication.[4] Our workforce is rapidly evolving, and with durable skills in such high demand, our high school education system must adapt to ensure students graduate with the knowledge and skills necessary to succeed.

KnowledgeWorks believes that personalized, competency-based approaches that orient high school around both academic achievement and higher order skills validation are key to preparing students for the workforce of tomorrow. Instead of high school and postsecondary systems focusing on a Carnegie Unit approach (course/letter grade/credit) which often fail to communicate true demonstration of aptitudes, our systems should pursue a mastery approach (skill/competency/credit) to knowledge and skills validation that is better aligned to workforce

[2] LinkedIn. Work Change Report. https://economicgraph.linkedin.com/content/dam/me/economicgraph/en-us/PDF/Work-Change-Report.pdf. January 2025.
[3] America Succeeds. The High Demand for Durable Skills. https://americasucceeds.org/portfolio/the-high-demand-for-durable-skills.
[4] Personnel Today. Young People are Less Work-Ready, Say Employers. https://www.personneltoday.com/hr/young-people-are-less-work-ready-say-employers/ May 2025.

demands. This shift has gained national momentum, with 20 states adopting statewide Portraits of a Graduate, including strong state examples in Utah, Nevada, and South Carolina.[5]

Another critical element of high school redesign is the inclusion of both formal opportunities—such as dual credit programs, work-based learning, and career and technical education (CTE)—and informal experiences—like capstone projects and community involvement. Each option helps students build the durable skills valued by higher education and industry and gives students an opportunity to engage in learning that is meaningful to them. For example, data from Kettle Moraine's High School of Health Sciences (HS2) shows that competency-based learning, flexible scheduling, and community partnerships have helped graduates pursue further education or careers in health sciences.[6]

We urge the Department to include a priority around high school redesign that emphasizes the value of PCBL approaches like HS2 and innovation related to skills validation. We also recommend funding initiatives that focus on expanding skills validation in the high school, postsecondary and workforce spaces. Examples include the Competency-Based Education Network's Partnership for Skills Validation,[7] which develops scalable skill assessments, and Skills for the Future,[8] which designs assessments capturing essential durable skills like collaboration, communication, and critical thinking.

2. Assessment and Accountability

To support meaningful learning and better reflect what students know and can do, it is critical to create stronger alignment between assessment and accountability systems and student-centered instructional approaches. While federal law requires annual testing and places significant weight on standardized assessments in accountability systems, these measures often fail to capture students' mastery of deeper learning and durable skills. As a result, they offer limited instructional value and often shift the focus to "teaching to the test."

Many states are interested in modernizing these systems to better support personalized, competency-based approaches. Montana, with the help of a federal waiver to avoid double testing during its field-testing year, is implementing a new math and English language arts assessment using smaller "testlets" that are embedded in the curriculum and can be administered when educators believe a student is ready to demonstrate mastery.[9] Additionally, Massachusetts leveraged the Innovation Assessment Demonstration Authority to pilot a new science assessment that enables students to engage in performance simulations to manipulate

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[5] KnowledgeWorks & the Aurora Institute. Competency-Based Education Policy Across the Nation. https://stateofcbe.org/. June 2025.
[6] Redesigning High School Around Competency-based Education and Pathways in Kettle Moraine. https://knowledgeworks.org/resources/high-school-competency-based-education-healthcare-wisconsin. August 15, 2023.
[7]The Partnership for Skills Validation. Competency-Based Education Network. https://www.c-ben.org/partnership-for-skills-validation/
[8]ETS & Carnegie Foundation. Skills for the Future. https://www.ets.org/skills-for-future.html
[9] Montana Aligned to Standards Through-Year. Montana Office of Public Instruction. https://opi.mt.gov/Leadership/Assessment-Accountability/Montana-Aligned-to-Standards-Through-Year

and analyze scientific data. As of 2023, the state had piloted the assessment with over 12,000 students in each of grades five and eight. Survey results showed strong positive students experiences and slight improvements in performance for Black and Hispanic students compared to the current state assessment.[10] Despite promising results, the lack of a clear and easy to navigate federal policy pathway has made it difficult to replicate such success across the country.

We urge the Department to include a discretionary grant priority that supports states in redesigning assessment and accountability systems to promote greater alignment with student-centered learning. This priority would promote the development of innovative models that measure a wider range of student outcomes, including transferable skills and demonstrated mastery, while still ensuring transparency. By encouraging this work, the Department of Education can help build a more responsive education system that supports students' success in a variety of postsecondary and workforce pathways.

3. Artificial Intelligence

90% of educators think that students should receive age-appropriate instruction on how AI works before graduating from high school, a reflection of the growing recognition of AI's relevance in education and beyond.[11] KnowledgeWorks believes that AI, when applied through a student-centered lens, holds tremendous potential to personalize learning and improve educational quality. We view AI not as a replacement for educators, but as a tool to enhance their capacity, freeing up time for deeper, more meaningful human engagement and enabling more differentiation based on each student's needs. In the near term, AI can support the development and implementation of PCBL by helping educators create clear competency frameworks and rubrics, improving assessment systems through more accurate scoring of performance tasks, and simulating collaborative scenarios between AI and learners to help evaluate critical skills. It can also transform how assessment data is communicated to students and families, offering richer insights and more targeted recommendations that accelerate learning. We urge the Department to include a discretionary grant priority that promotes the responsible use of AI in student-centered learning environments to support deeper, more personalized learning experiences.

4. Teacher Shortage

A severe teacher shortage continues to affect public education, with 86% of school districts reporting difficulty filling teaching positions in the 2023–2024 school year.[12] This shortage not only strains existing staff but also impacts the quality of instruction and the ability of schools to

[10] Clearing the Path for Assessment Innovation: The Role of Federal Policy ©2023 by Aurora Institute, Center for Assessment, Center for Innovation in Education, Envision Learning Partners, Great Schools Partnership and KnowledgeWorks Foundation. https://knowledgeworks.org/resources/federal-policy-assessment-innovation/.

[11] How Young is Too Young to Teach Students About AI? EdWeek. https://www.edweek.org/technology/how-young-is-too-young-to-teach-students-about-ai-survey-reveals-differing-opinions/2024/02. February 29, 2024.

[12] NCES. https://nces.ed.gov/whatsnew/press_releases/10_17_2023.asp. October 17, 2023.

meet students' learning needs. As schools explore new models to better serve students, PCBL approaches are showing promise for improving teacher satisfaction and retention. These models give educators more agency in designing instruction, allow for more meaningful engagement with students, and create more manageable and rewarding teaching environments.

Evidence from across the country supports this potential. In Arizona, our partners implementing PCBL models at Yuma Union High School District are experiencing its highest teacher retention rate in 15 years,[13] and in Texas, Ector County Independent School District has reduced teacher vacancies from 350 in 2019 to just 29 in 2024.[14] Additionally, 68% of educators in North Dakota and Arizona who are implementing personalized learning report increased job satisfaction.[15] More broadly, research findings suggest that using student-centered approaches can also lead to higher rates of job satisfaction and lower rates of burnout, as well as improved school culture.[16] To support a more stable and motivated educator workforce, we urge the Department to include a discretionary grant priority that invests in strategies proven to improve teacher satisfaction and retention through student-centered learning environments.

Conclusion

Thank you for your consideration of KnowledgeWorks' recommendations to clearly define PCBL and adopt four additional priorities focused on high school redesign (with an emphasis on reimaging skills validation), assessment and accountability systems, artificial intelligence, and the teacher shortage. We believe these priorities are essential to guiding federal policies that support the growth of PCBL systems that prepare all learners for success.

Sincerely,

Lillian Pace
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KnowledgeWorks

[13] YUHSD Enjoys Highest Teacher Rate in 15 years, KAWC. https://www.kawc.org/news/2023-08-24/yuhsd-enjoys-highest-teacher-retention-rate-in-15-years. August 24, 2023
[14] District Spotlight: Ector County Independent School District (TX), National Council on Teacher Quality. https://reimagineteaching.nctq.org/case-study/ector-county/
[15] KnowledgeWorks (2021, 2022, 2023, 2024). Implementation and Impact Dashboards: Arizona, North Dakota.
[16] "Compelling Data," KnowledgeWorks. https://knowledgeworks.org/wp-content/uploads/2023/09/data-library-presentation-slides-knowledgeworks.pdf. September 2023.