February 13, 2026

National Science Foundation
Directorate for Technology, Innovation and Partnerships
Directorate for STEM Education
2415 Eisenhower Avenue
Alexandria, VA 22314

Re: Investing in U.S. Workforce Training and Innovation to Advance President Donald J. Trump's Trade Agreement with Japan and other Asian Partners to Ensure America's Energy Dominance Request for Information

To whom it may concern,

The American Council on Education (ACE) submits these comments in response to the National Science Foundation's (NSF) request for information (RFI) on investing in U.S. workforce training and innovation.[1] ACE is a leading higher education membership organization representing over 1,600 colleges, universities, associations and alternative postsecondary education providers. U.S. colleges and universities play an integral role in workforce development. Our members not only equip learners with skills that meet immediate workforce needs but also prepare them to be agile and adaptive to future needs.

As NSF considers investments in workforce training and innovation, we urge NSF to prioritize initiatives that include colleges and universities as key partners to industry in meeting immediate workforce needs, but also to ensure long-term dominance of the U.S. energy sector. Particularly, we view that there are models for on-/off-ramps between learning and working that can strengthen the partnership between higher education institutions and industry in ways that promote learner success beyond preparing them for jobs today.

For example, short-term programs for new skills development should be created with stackability toward degrees, which can be applied as needed for new skills and continuing education programs. Stackable short-term credentials would facilitate quick transitions between learning and working, allowing workers to be more responsive to quickly emerging industry needs while building towards a degree. ACE also encourages NSF to align expectations for support of short-term credentials in energy with the Department of Education's requirements for workforce Pell grants and the talent marketplace program.

Any new programs created by NSF should also seek to strengthen the "learn and earn" model and build on existing higher education and industry partnerships to form a workforce that is more responsive to emergent industry needs. Apprenticeships blend learning and working simultaneously towards skill development and are programs that community colleges are positioned to provide, serving as high quality instructors or registered sponsors to further

[1] https://sam.gov/workspace/contract/opp/1117121d48704403828b10bd0d66c57b/view

opportunities for hands-on training and learning opportunities.[2] Work colleges and co-op programs also serve as models that could further strengthen the connection between institutions of higher education and industry.[3] [4] All programs offer students high quality learning opportunities and hands-on training with industry partners to foster workforce preparation. These existing "learn and earn" models already support a flexible and adaptable workforce with training that is responsive to industry needs and quickly prepares workers, and NSF should consider investment in these models to further support the development of a world-class training ecosystem.

We also believe that more robust recognition and acceptance of credit for prior learning is a key to shorter time for completion and improved graduation rates. Research shows that when students receive credit for their prior learning, they are 17 percent more likely to graduate and save 9-14 months to degree, directly supporting NSF's goal to prepare workers for "day one" readiness in advanced manufacturing, energy, and emerging technologies, and increase graduation rates among science disciplines.[5] Credit for prior learning can also reduce costs for students, decreasing the financial lift of reskilling and upskilling.

Long-term workforce ecosystem development should also consider Learning & Employment Records to document skills, competencies and credentials earned across education and work. Linking learning mobility information as structured data can contribute to ecosystem efforts to create seamless pathways across work and education through easily articulated and understood skill descriptions.

Higher education currently provides a strong framework for skill development and worker training, and when considering short- and long-term workforce development strategies, colleges and universities should be considered important partners. We look forward to continuing to work with you on these important issues. If you have any questions regarding these comments, feel free to reach out to Hironao Okahana, Managing Researcher and Chief of Planning and Impact at hokahana@acenet.edu.

Sincerely,

Ted Mitchell, President

Cc: Rebecca Keiser, Acting Chief of Staff and Chief of Research Security Strategy and Policy

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[2] 2019 ACE report "Preparing the Workforce in Today's Community Colleges": https://www.acenet.edu/Documents/Preparing-the-Workforce-in-Todays-Comty-Colleges.pdf
[3] 2022 ACE report "Exploring the Work College Model for Working Learners": https://www.acenet.edu/Documents/Exploring-Work-College-Model.pdf
[4] Northeastern University Co-op program: https://www.northeastern.edu/co-op/
[5] 2020 Council for Adult and Experiential Learning (CAEL)/ Western Interstate Commission for Higher Education (WICHE) report "The PLA Boost": https://www.cael.org/hubfs/PLA%20Boost%20Paper%20ExecSummary%20-%20Oct%202020.pdf